Snowy River CO_2 Sequestration Project
ePlanning NEPA Number
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1 Introduction

1.1 Background

Geologic sequestration is the long-term containment of supercritical carbon dioxide (CO_2) into subsurface geologic formations. The goal of geologic sequestration of CO_2 is to trap CO_2 emitted from stationary anthropogenic sources permanently underground with the ultimate goal to reduce emissions of greenhouse gases (GHGs) from these sources into the atmosphere. CO_2 for sequestration is first captured from a large stationary source, such as a coal-fired power plant or chemical production facility or through a direct air capture facility. Although CO_2 is initially captured as a gas, it is compressed into a supercritical fluid—a relatively dense fluid intermediate to a gas and a liquid. The CO_2 is injected through specially designed wells into deep geologic formations. These formations include, for example, large deep saline reservoirs (underground basins containing salty fluids) and oil and gas reservoirs no longer in production. Formations are selected based on geologic characteristics indicating that they can safely contain the CO_2 for long-term storage. Impermeable rocks above the target reservoir keep the CO_2 in a supercritical fluid state and prevent migration into shallower groundwater or into other formations.

Under the Safe Drinking Water Act (SDWA), the U.S. Environmental Protection Agency (EPA), is tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies. The SDWA provides authorities for regulating underground injection of fluids and serves as the framework for regulation of geologic sequestration of CO_2. In 1980, EPA promulgated regulations for Underground Injection Control (UIC) Classes I to V to protect underground sources of drinking water (USDW) by preventing injection wells from contaminating USDW (40 Code of Federal Regulations [CFR] Parts 144-148). In 2010, EPA published a final rule that revised the UIC Program to include geologic sequestration of CO_2 for long-term storage and established UIC Class VI, a new class of wells solely for geologic sequestration of CO_2 (76 Federal Register [FR] 56982). Well performance standards and other requirements established in the UIC Class VI Rule are based on the distinctive features of CO_2 injection compared to other types of injection. These requirements are the most rigorous of the UIC Program. They include performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. Additional EPA UIC Class VI Program details can be found at https://www.epa.gov/uic/class-vi-wells-used-geologic-sequestration-carbon-dioxide.

UIC Class VI projects are subject to applicable permits for use and access of federal, state, county, and/or private lands and associated pore space. This Environmental Assessment (EA) addresses the review of the proposed Bureau of Land Management (BLM) Rights-of-Way (ROW), pursuant to 43 CFR Part 2800 and Title V of the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, for use of public lands for a UIC Class VI operation in Carter County, Montana.

1.2 Summary of Proposed Project

Denbury Carbon Solutions, LLC, a wholly owned subsidiary of Denbury Inc. (collectively, Denbury) proposes to construct the Snowy River CO_2 Sequestration Project (Project) in Carter County, Montana on lands managed by the BLM, the State of Montana (Montana Department of Natural Resources and Conservation, Trust Land Management Division), and on lands that are privately owned. On November 18, 2021, Denbury submitted an SF-299 Application for Transportation and Utility Systems and Facilities on Federal Lands (SF-299). The SF-299 requested ROWs for a 30 year-

term for the construction and operation of the following elements on BLM-administered lands: access roads, well pads, main bulklines (i.e., main supply pipelines), flowlines (i.e., branch supply pipelines), pump stations and offices, and for use of federal underground pore space to sequester CO_2. Denbury estimates injecting approximately 150 million tons of CO_2 over the course of 20 years, which is equivalent to annual GHG emissions from more than 1.6 million cars. The proposed well pads would be used to operate UIC Class VI injection wells that would inject CO_2 transported using the existing Denbury Cedar Creek Anticline (CCA) Pipeline, which is a 105-mile pipeline that currently transports CO_2 from the Bell Creek Oilfield in Powder River County, Montana, to the CCA Enhanced Oil Recovery unit in Fallon County, Montana. The existing CCA Pipeline is independent of the proposed Project and would continue to operate whether or not the proposed action is approved. The proposed Project elements and existing CO_2 pipeline are shown in Figure 1 in EA Appendix D. Permitting of the UIC Class VI injection wells would be under a separate review and authorization by the EPA Region 8. Although the Project is a carbon sequestration project, it is not a carbon capture project; therefore, it does not meet the Internal Revenue Code Section 45Q requirements, and Denbury would not receive tax credits for the Project.

On September 8, 2023, Denbury submitted a Plan of Development (POD) to support its SF-299 application. The BLM deemed the application complete, which allowed BLM to initiate its review under the National Environmental Policy Act (NEPA). The POD outlines the construction procedures, environmental requirements, site-specific Project plans, and design features that would be implemented by Denbury during the construction, operation, and reclamation stages of the Project to mitigate environmental impacts. The Project POD (Denbury 2025), is available on the Project's BLM ePlanning website (https://eplanning.blm.gov/eplanning-ui/project/2026556/510).

1.3 Purpose and Need

The purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO_2 in Carter County, Montana.

1.4 Decision to be Made

The BLM would determine whether to approve all, in part, or sequentially, the SF-299 application and associated POD for the proposed action and, if so, with what stipulations to the short-term and long-term ROW grants.

In accordance with the SDWA, the EPA is the permitting agency for UIC Class VI permits.

1.5 Land Use Plan Conformance

The proposed action is in accordance with the decisions contained in the 2015 Miles City Field Office (MCFO) Record of Decision and approved Resource Management Plan (RMP). The proposed action would be located within greater sage-grouse (*Centrocercus urophasianus*) Priority Habitat Management Area (PHMA). In the 2015 MCFO RMP, PHMAs are listed as avoidance areas for major and minor ROWs (Management Decision [MD] 3 on pages 2-9 and 2-10). Chapter 6 of the 2015 MCFO RMP defines avoidance areas as "Areas with sensitive resource values in which ROWs and surface disturbing and disruptive activities would be strongly discouraged. ROW avoidance areas are to be avoided but may be available for location of ROWs with special stipulations / mitigation."

RMP MDs specific to sage-grouse habitat and PHMA include:

> **MD 1:** "In all Greater Sage-Grouse (GRSG) habitat, in undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. This will be achieved by avoiding, minimizing, and compensating for impacts by applying beneficial mitigation actions."
>
> **MD 3:** "PHMA is managed according to the following prescriptions:...If the 3% anthropogenic disturbance cap is exceeded on lands (regardless of land ownership) or if anthropogenic disturbance and habitat loss associated with conversion to agricultural tillage or fire exceed 5% within a analysis area in PHMA, then no further discrete anthropogenic disturbances (subject to applicable laws and regulations, such as the Mining Law of 1872, valid existing rights, etc.) will be permitted by BLM within PHMA in a analysis area until the disturbance has been reduced to less than the cap. If the BLM determines that the State of Montana has adopted a GRSG Habitat Conservation Program that contains comparable components to those found in the State of Wyoming's Core Area Strategy including an all lands approach for calculating anthropogenic disturbances, a clear methodology for measuring the density of operations, and a fully operational Density Disturbance Calculation Tool, the 3% disturbance cap will be converted to a 5% cap for all sources of habitat alteration within an analysis area."

The proposed action must be in compliance with BLM sage-grouse goals, objectives, and MDs based on Denbury's implementation of avoidance measures, adherence to stipulations and mitigation requirements, and compliance with the EO 12-2015 (see below). Conformance will be evaluated through the Project meeting the RMP sage-grouse conservation goals to "Provide for the conservation, enhancement, restoration, and connectivity of the Northern Great Plains mixed grass prairie and shrubland, capable of supporting sustainable populations of GRSG and other wildlife species," and PHMA objectives to:

1) Maintain or increase GRSG habitat over the long-term recognizing valid existing rights;
2) Restore degraded GRSG habitat;
3) Manage permitted uses while providing GRSG habitat for the long-term;

The State of Montana established the Montana Sage Grouse Habitat Conservation Program (Program) in 2014 with the objective of sustaining viable sage-grouse populations and conserving habitat. In 2015, the *Executive Order Amending and Providing for Implementation of the Montana Sage Grouse Conservation Strategy* (EO 12-2015) was issued to clarify aspects of the program. Upon determination that the State Program (and Strategy) was operational, effective, and consistent with all BLM goals and objectives for sage-grouse conservation, BLM approved land use plan maintenance (DOI-BLM-MT-2018-0005-CX) on July 30, 2018, which clarified that the State's approach to analyzing disturbance was operational and effective. This provided for consistency between the BLM and State of Montana helping to achieve more effective conservation across all land ownerships, as clearly desired in both the RMP and the State's Strategy.

The BLM adopted and implemented the State's approach to analyzing disturbance as outlined in EO 12-2015 Attachments D (*Stipulations for Uses and Activities*) and H (*Definitions*), which specifically identifies surface disturbance limited to 5% of suitable sage-grouse habitat, maximum disturbance process using the Density Disturbance Calculation tool (DDCT), and deviations and exceptions

process allowing for deviations from the 5% cap that demonstrate the proposed action will not cause declines in sage-grouse populations in core habitat (i.e., PHMA).

Section 3.5 evaluates GRSG habitat impacts based on the proposed action, the results of the analysis that was completed using Program tools, and the avoidance, minimization, and mitigation measures that Denbury would implement for the Project.

1.6 Relationship to Statutes, Regulations, Other NEPA Documents

The Project crosses federal, state, and private land and is subject to federal, state, and local permit requirements. Denbury would comply with applicable federal, state, and local laws, plans, and permits required for the proposed action. See Table 2-11 in the POD for a list of the federal, state, and local permits and/or approvals required prior to construction and operation of the proposed action.

The BLM ROW grants would be issued pursuant to 43 CFR Part 2800 and Title V of the FLPMA, as amended. The ROW grants would be subject to the terms and conditions in 43 CFR Part 2800, the terms and conditions and stipulations specified, and mitigations set forth in the application and POD. Denbury requested a ROW term for a period of 30 years (renewable). This EA incorporates analysis from the 2024 Final Supplemental Environmental Impact Statement (SEIS) and Proposed Resource Management Plan Amendment (BLM 2024).

The Department of the Interior (Department or DOI) is partially rescinding and making necessary targeted updates to its regulations implementing the NEPA, which were promulgated to "supplement" now-rescinded Council on Environmental Quality (CEQ) NEPA implementing regulations.

DOI's Interim Final Rule for NEPA Implementing Regulations states, "revised agency procedures will have no effect on ongoing NEPA reviews, where DOI, following CEQ guidance, will continue to apply the preexisting procedures to applications that are sufficiently advanced." The analysis in this EA was largely drafted using now-rescinded CEQ regulations and therefore contains references and analysis beyond what is required under NEPA. The BLM verifies that it has complied with the requirements of NEPA, including the Department's new regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and 516 Departmental Manual 1 effective July 3, 2025.

Recent Presidential instructions, as well as recent court decisions, also inform how the Department and its bureaus comply with the NEPA. EO 14154, *Unleashing American Energy* (Jan. 20, 2025), and a Presidential Memorandum, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity* (Jan. 21, 2025), require the Department to strictly adhere to the NEPA, 42 United States Code (U.S.C.) §§ 4321 et seq. Further, such Orders and Memorandum repeal EOs 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because EOs 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. While BLM considered environmental justice in the Draft EA, the recent January 2025 EO and Presidential Memorandum explain how an evaluation of environmental justice is not legally required or necessary to make a reasoned decision.

EO 14154, *Unleashing American Energy* (Jan. 20, 2025), also disbanded the Interagency Working Group on the Social Cost of Greenhouse Gases (IWG) and withdrew any guidance, instruction, recommendation, or document issued by the IWG, including "estimates of the social cost of greenhouse gases, including the estimates for the social cost of carbon... based, in whole or in part, on the IWG's work or guidance". While BLM considered social cost of carbon in the Draft EA, Section 6(c) of EO 14154 states, "The calculation of the 'social cost of carbon' is marked by logical deficiencies, a poor basis in empirical science, politicization, and the absence of a foundation in

legislation. Its abuse arbitrarily slows regulatory decisions and, by rendering the United States economy internationally uncompetitive, encourages a greater human impact on the environment by affording less efficient foreign energy producers a greater share of the global energy and natural resource market. Consequently, within 60 days of the date of this order, the Administrator of the EPA shall issue guidance to address these harmful and detrimental inadequacies, including consideration of eliminating the "social cost of carbon" calculation from any Federal permitting or regulatory decision."

In addition, the analysis in the EA was entirely drafted before the Supreme Court's decision in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025). As a result, the EA contains analysis beyond what is required under NEPA. BLM has decided to leave this additional analysis in the EA rather than taking the time and resources to remove it, particularly, analysis that is attenuated in time and geography from the Project, that is not required to be analyzed under NEPA, and pertains to matters beyond the Department's control.

Coordination with regulatory agencies is summarized in Chapter 4 of this EA.

1.7 Issues Identified for Analysis

Site-specific resource concerns were identified by the BLM during its review of the POD and in consideration of substantive scoping comments. The BLM focuses its analysis on issues that are significant to the action. Issues have a cause-effect relationship with the proposed action or alternatives, are within the scope of analysis, and are amenable to scientific analysis. The resource issues considered and the rationales for continued analysis of the resources are discussed below.

1.7.1 Issue 1. Air Resources and Greenhouse Gas Emissions

a) What are the potential impacts to air resources from the estimated magnitude of criteria pollutants, volatile organic compounds (VOCs), and hazardous air pollutants (HAPs) from Project construction, operations, and reclamation activities?

b) What are the potential impacts to air resources from the estimated amount of GHGs from drilling, construction, reclamation, and operations (pumps/facilities) as well as impacts from the cumulative CO_2 being sequestered?

1.7.2 Issue 2. Cultural Resources

a) What is the proposed action's effect to Historic Properties within the Area of Potential Effects (APE)?

b) How would the Chalk Buttes Traditional Cultural Property (TCP) be affected by the proposed action? Would the effects be significant?

1.7.3 Issue 3. Socioeconomics

a) What are the potential impacts to local social and economic conditions that may include changes in population and housing; community facilities and public services; economy and employment; land use, transportation routes, and property access for the proposed action?

1.7.4 Issue 4. Wildlife (Sage-Grouse and Sage-Grouse Habitat)

a) What are the potential impacts to greater sage-grouse populations and associated habitat from construction, reclamation, and operation activities from the proposed ROWs as a

result of the deviations from the 5% disturbance cap and U.S. Geological Survey (USGS) conservation buffers?

1.7.5 Issue 5. Water Quality and Related Public Health

a) What are the potential impacts to water quality and related public health in the Project area that may result from construction and operation of the surface ROWs and injection of CO_2?

1.8 Issues Identified but Eliminated from Further Analysis

The following resources were determined to not be present within or adjacent to the proposed action area and were therefore excluded from further analysis: Areas of Critical Environmental Concern; Backcountry Conservation Areas; 100-year floodplains; source water protection areas, municipal water sources, forestry resources and woodland products; lands with wilderness characteristics; special status species plants; wild horses and burros; Wild and Scenic Rivers; and Wilderness and Wilderness Study Areas.

In addition, the BLM assessed potential impacts to several resources that are present within the proposed action area but determined that impacts would be avoided, minimized, or otherwise mitigated through the proposed design features and applicant-committed measures discussed in Chapter 2 and the POD; therefore, these resources would not be affected to a degree that detailed analysis was warranted in Chapter 3 of this EA. This section summarizes the results of BLM's assessment for each resource that was identified but eliminated from further analysis.

In response to public comments received on water quality and related public health during the EA public comment period, the BLM determined analysis was necessary in this EA to provide clarity. Section 3.6 has been added to the EA to clarify the results of BLM's assessment and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative.

1.8.1 Public Access and Permitted Uses, and Public Safety

The proposed action would not result in changes to existing access to public lands and would have minimal disruptions to permitted uses in the area. Denbury would implement a traffic management plan for all Project stages, and proposed Project activities would not occur on a continuous basis. Construction, drilling, operations, maintenance, and reclamation activities would take place in a phased approach over a 20-year period. During injection, operation, and maintenance activities, Denbury proposes to restrict traffic to one vehicle for well inspections between the hours of 8:00 a.m. and 7:00 p.m.

The Project would use approximately 25 miles of existing developed roads (Lone Tree Road, Ridge Road, and Hammond Road) and 27 miles of existing two-tracks. Fourteen miles of the existing developed roads and 25 miles of existing two-tracks are on BLM-administered lands. Existing roads would be maintained in their existing condition; no grading or improvements are proposed. Weed-free mats would be used to facilitate access of construction equipment and drill rigs during wet weather. County road agreements for road maintenance and bonding for surface disturbances for the life of the Project would be in place prior to county road use.

Approximately five miles of new access roads (four miles on BLM-administered lands) would be created. Three miles would be spurs off existing roads that end at wells or pump stations, and two miles would extend along the existing CCA pipeline corridor. Except for a 0.25-mile road that

would be graded and graveled for access to the Pump Station North, each new road would be maintained as a two-track. New roads would not create access to currently inaccessible public lands; existing roads already provide public access in the area.

Existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. If temporary lane or road closures are required for public safety, Denbury would coordinate with the appropriate agency (BLM, Carter County, Montana Department of Transportation, etc.) and emergency response organizations to minimize traffic disruptions. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions.

There are five hunting outfitters with special recreation permits within the Project area. The proposed construction, drilling, operations, maintenance, and reclamation activities would take place in a phased approach over a 20-year period and would predominately be outside of the prime hunting season for the five permits, resulting in minimal disruption to hunting activities. As noted above, Denbury would coordinate with BLM for temporary road closures and/or reroutes, which would assist BLM in informing recreationists of scheduled activities.

The proposed action would not interfere with existing land and realty authorizations.

The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM Animal Unit Months (AUMs) where surface ROWs associated with the proposed action would occur. Fourteen allotments would have negligible AUMs, less than 1% in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. See *Vegetation* below.

Based on noise modeling of the pump stations, which are the facilities that would generate noise during Project operations, there would be no changes to the existing ambient sound levels at the closest residences, which are 3.4 miles from Pump Station North and 2.2 miles from Pump Station South. Additional details about the noise modeling and methodology are provided in POD Appendix V. Figure 2 in Appendix D of this EA shows the modeled sound level contours surrounding each proposed pump station.

The proposed action would not result in substantial visual changes to the landscape. The Project is proposed in areas that have been rated as Class III and Class IV visual resource management (VRM) areas[1]. There are no VRM Class I or VRM Class II areas within the Project area. Approximately 88% of the proposed surface ROWs are sited in VRM Class IV areas, and 12% are sited in VRM Class III

[1] VRM classes are categories assigned to public lands based on scenic quality, sensitivity level, and distance zones, with Classes I and II being the most valued, Class III being moderately valued, and Class IV being least valued. Classes I-IV objectives define the allowable amount of change within the landscape. The management objective for VRM Class I is to preserve the existing landscape; the Class II objective is to retain the existing character of the landscape; the Class III objective is to partially retain the existing landscape; and the Class IV objective is to provide for management activities that require landscape modification.

areas. All aboveground infrastructure would be located in Class IV areas with exception of Injection Well 15, which would be located in a Class III area. The Project would meet or exceed VRM requirements outlined in the 2015 MCFO RMP through the placement of infrastructure along existing disturbances and in VRM Class III and VRM Class IV areas, implementation of the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G), and selection of paint and material colors that blend in with the surrounding landscape (POD Section 5.12).

As described in EA Section 2.1.1 and further detailed in EA Section 3.6.3, pipelines would be constructed, operated, and maintained in accordance with U.S. Department of Transportation (USDOT) regulatory requirements outlined in 49 CFR Part 195. Valves would be installed at required spacings to provide shut-off locations, and pipelines would be subject to hydrostatic testing before they become operational to verify there are no leaks. In addition to regular patrols and leakage surveys, flowlines and bulklines would be equipped with a Supervisory Control and Data Acquisition (SCADA) system that would allow remote monitoring of the pipelines and transmittal of the data to Denbury's pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed.

Injection wells would be constructed, tested, operated, and monitored following requirements outlined in 40 CFR Part 146 Subpart H. Per 40 CFR §146.88, Denbury would be required to install and use continuous recording devices to monitor injection pressures, rates, and volumes; alarms; and automatic surface or down-hole shut-off systems. If a shutdown occurs, Denbury would be required to stop injection, investigate the incident, notify the EPA, and receive EPA UIC Program Director approval before resuming injection.

Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT Pipeline and Hazardous Materials Safety Administration (PHMSA) regulatory requirements. Denbury would host annual tabletop drills for its operations personnel and local response officials. The BLM would be notified of training and emergency events associated with the Project. See Section 3.6 for additional analysis on public health related to water quality.

There are no known sources of hazardous material areas within the Project area and there are none proposed for the Project. Denbury would dispose of waste in accordance with regulatory requirements.

1.8.2 Native American Religious Concerns

Chapter 4 describes BLM's coordination with 17 Native American tribes. No known tribal religious concerns have been identified.

1.8.3 Vegetation

Vegetation would be disturbed within the ROWs for surface elements during construction and injection operations, resulting in approximately 370 acres of new surface disturbance[2]; however, impacts are anticipated to be short-term due to phased development which would allow for expedited reclamation and the co-location of facilities along existing disturbances. Denbury would

[2] Excludes ROWs for existing developed roads and existing two-tracks that would not result in new disturbance or a change in land use.

implement a Reclamation, Mitigation, and Monitoring Plan that meets or exceeds 2015 MCFO RMP requirements to restore and maintain vegetation community and diversity. The plan (POD Appendix G) outlines procedures for re-establishing native vegetation to provide site stability for surface disturbing activities within the ROW areas during construction, reclamation, and post-reclamation activities. The plan includes topsoil management and compaction mitigation practices, site-specific BLM-recommended seed mixes, monitoring requirements, and reporting to the BLM during reclamation efforts to ensure BLM standards are met and that disturbances, including but not limited to areas used for grazing and wildlife habitat, are promptly reclaimed. A third-party environmental inspector would be employed to provide oversight, monitor, and report on compliance with the ROW stipulations, permit conditions, and procedures and commitments outlined in the POD and associated appendices during construction and reclamation activities.

Denbury would maintain gravel cover for the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road to the Pump Station North for the duration of CO_2 injection operations. In addition to the 35 acres of gravel that would be dispersed in small areas throughout the 110,100-acre Project area, an additional 10 acres of vegetated land would be converted to new two-tracks.

Denbury has prepared a comprehensive Noxious Weed Management Plan (POD Appendix J) that meets the 2015 MCFO RMP objectives to prevent the expansion or eliminate the occurrence of invasive, non-native, or noxious weed species within the proposed ROWs. Moreover, in 2022, 2023, and 2024, Denbury obtained BLM Pesticide Use Permits and initiated the monitoring and treatment of noxious weed populations that were mapped within the proposed disturbance areas (approximately 120 acres). Denbury also treated additional areas of infestation that the BLM had previously identified in the overall Project area. In total, approximately 800 acres of the invasive North African ventenata (*Ventenata dubia*) were treated in 2022, 1,200 acres were treated in 2023, and 1,145 acres were treated in 2024. Denbury would continue annual monitoring and treatment of noxious weeds in accordance with BLM Pesticide Use Permits prior to Project construction and throughout the life of the Project.

1.8.4 Wildlife and Fisheries

Applicant-committed measures identified in the POD and the associated Reclamation, Mitigation, and Monitoring Plan meet or exceed 2015 MCFO RMP requirements to restore and maintain vegetation community health, connectivity, and diversity associated with wildlife habitats. The seed mix that would be used for reclamation is based on BLM-recommended grouped ecological site descriptions including Wyoming big sagebrush (*Artemesia tridentata* ssp. *Wyomingensis*) and other native plant species that provide critical habitat to wildlife. Noxious weed monitoring and treatment would enhance habitat reclamation. In addition, Denbury commits to complete construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to mitigate disturbance to grouse, migratory birds, raptors, and winter big game areas. The condensed construction schedule would avoid sage-grouse nesting, breeding, and early-brood rearing seasons (March 15 through July 15); migratory bird and songbird nesting season (April 15 through July 15); avoid bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila chrysaetos*) breeding season (March 15 through July 15); and reduce disturbances during the crucial winter range season for big game species including pronghorn (*Antilocapra americana*) and mule deer (*Odocoileus hemionus*) and sage-grouse, which generally occurs December through March. Moreover, the phased development of the eight groups over a 20-year period would result in negligible changes to resources. Winter flights completed by Montana Fish, Wildlife and Parks (MTFWP) in 2020 found large groupings of pronghorn (80+ individuals) to the east of the Project

area near Box Elder Creek, suggesting the area is important for pronghorn during harsh winter conditions. Therefore, construction, drilling, routine maintenance, and reclamation activities would only occur between July 16 and November 30 in any given year.

In addition to restricting construction, drilling, routine maintenance, and reclamation activities, pipeline and injection well operations would be remotely monitored, and operational vehicle traffic for monitoring is expected be up to one vehicle visit per well per day, or less, depending on weather and operation conditions.

Due to the uplisting of the northern long-eared bat (*Myotis septentrionalis* [NLEB]) during the application review process, the BLM assessed potential impacts that the proposed action may have on the species. The BLM completed four consecutive years of mist net surveys at Box Elder Creek, near the proposed action area, as part of a separate interagency project, with no NLEB individuals observed. Additionally, Burns and McDonnell completed two acoustic surveys within the Project area, and no NLEBs were identified. A complete list of bat species identified during acoustic surveys is provided in POD Appendix M. The NLEB has not been documented in Carter County; however, Carter is listed as a county where the NLEB may occur. White-nosed syndrome, a disease that is detrimental to bat species, was documented within Carter County in 2021 (Almberg et. al 2022). While the nearest documentation of the NLEB is more than 50 miles away at Devil's Tower in Wyoming and the Black Hills in South Dakota, approximately 780 acres of potential habitat exists for the species within the southwest portion of the Project area. However, no trees would be removed to construct or operate the Project, and no direct or indirect impacts are anticipated. No hibernacula are known to occur in the Project area. The proposed surface and subsurface disturbing features would not be expected to impact potential habitat. For these reasons it was determined that the proposed action will have *no effect* on the NLEB.

The BLM considered impacts to bald and golden eagles within 1 mile of the Project area. Raptor nest surveys were conducted via helicopter in May 2022 and April 2023, and surveys for eagle winter roosts were completed in December 2022 and February 2023. One inactive golden eagle nest (BLM Nest ID GE03S58E2601), located 0.2 miles from proposed Injection Well 11, was found to be dilapidated in 2022. During 2023 surveys, this nest was not located and was likely destroyed by weather events. Although active and inactive eagle nests and several golden eagles were observed within the Project area, no other known nests are within 0.5 miles of proposed construction activities. Denbury does not propose removing trees or rock outcroppings to construct or operate the Project, and construction, drilling, routine maintenance, and reclamation activities would be conducted between July 16 and November 30, which is outside of raptor nesting season. Therefore, the BLM determined that further evaluation of impacts to bald and golden eagles was not necessary.

The BLM considered potential impacts of noise from the proposed pump stations within songbird breeding habitat. Noise levels that exceed 49 A-weighted decibels (dBA) could disrupt songbirds during the breeding season (Ingelfinger 2001). A 49 dBA contour was added to Figure 2 in EA Appendix D to demonstrate the extent to which noise from each pump station may reach 49 dBA. The contour extends approximately 0.2 mile from the edge of each pump station. Approximately 91 acres, or 0.08% of the Project area, falls within the 49 dBA contour surrounding the Pump Station North. Approximately 67 acres, or 0.06% of the Project area, falls within the 49 dBA contour surrounding the Pump Station South. Based on the limited portion of the Project area that may have sound levels that reach 49 dBA, the abundance of surrounding songbird breeding habitat, and the close proximity of each pump station to existing roads, where vehicle traffic may also contribute to elevated noise levels, the BLM determined that noise impacts to songbirds and associated breeding

habitat was not an issue that warranted further analysis. Additional details about the noise modeling and methodology are provided in POD Appendix V.

The BLM considered potential impacts to fisheries. Dead Boy Creek, a tributary of Box Elder Creek, is the only fish-bearing intermittent stream that intersects a ROW element. There are no pallid sturgeon (*Scaphirhynchus albus*) or potential habitat for the species in the Project area. Timber Creek and its tributaries drain to the Powder River, which contains known pallid sturgeon habitat. However, none of the proposed ROW elements (injection wells, bulklines, or access roads) intersect Timber Creek or tributaries thereto; therefore, the Project is not anticipated to impact any streams within the Powder River watershed. Denbury's Reclamation, Mitigation, and Monitoring Plan includes procedures to control erosion and reduce the potential for sediment to be transported offsite or into wetlands or streams. In addition, phased development would result in smaller amounts of disturbance at any given time, which would allow for expedited reclamation. Spill prevention, containment, and response procedures outlined in Section 6.1 of the POD would be implemented to protect groundwater and surface waters from accidental spills or leaks.

1.8.5 Geological, Paleontological, and Soil Resources

There are no known mineral pits within the Project area. No federal minerals or cut materials from split estates would be used to develop the Project. Material used for Project development would be from commercial or private surface and mineral owners and would be permitted by appropriate entities, as required. There are no known mining claims, locatable operations, or coal leases/licenses within the Project area, and development potential is limited and unlikely.

The Project area has low potential for oil and gas development. There are no active oil and gas wells or leases within the Project area. All previously drilled wells have been plugged and abandoned. The Project does not propose development of hydrocarbons. The POD includes a well construction plan for the UIC Class VI wells. In addition, Denbury would include the BLM in the UIC permit reviews, which would allow BLM to review detailed well construction and drilling parameters and provide comments on measures to ensure protection of federal hydrocarbon bearing zones with development potential.

Portions of Carter County are known to contain geologic formations containing erionite, a carcinogen regulated under the Toxic Substance Control Act. Erionite has been detected in samples from the Arikaree Sandstone (Beaucham, King, Feldmann, Harper, & Dozier 2018), a formation which is present at the crest of the Ekalaka Hills, Blue Mud Hills, and the Chalk Buttes. Although the Arikaree Formation is not known to be present within the Project area, there is a potential for soils to contain detritus from the weathering of the surrounding hills and buttes. The POD includes precautionary measures, consistent to the National Institute for Occupational Safety and Health recommendations, to reduce or eliminate erionite exposure during earth disturbing activities within the ROW areas during construction, reclamation, and post-reclamation activities.

Denbury conducted a paleontological survey for the Project within an approximately 300-foot-wide study corridor along the proposed ROWs for surface elements. An Unanticipated Discoveries Plan (UDP) for Paleontological Resources has been prepared to help prepare everyone involved with the Project to know what to look for, and what to do if something of potential scientific interest is discovered. The UDP is provided as POD Appendix T. Additionally, a BLM-approved paleontologist would monitor all surface disturbing construction activities.

Soil resources would be addressed through the implementation of Denbury's Reclamation, Mitigation, and Monitoring Plan, which meets 2015 MCFO RMP requirements to reduce water/wind erosion and re-establish site stability. The Plan includes notification requirements to the BLM

Authorized Officer prior to and during reclamation efforts to ensure they meet BLM standards. The POD includes project monitoring and oversight by a third-party environmental compliance inspector to ensure POD construction and reclamation measures are completed for the Project. Seed mixes are based on BLM grouped ecological site descriptions.

2 Alternatives

Alternatives were developed based on resource issues identified during the scoping period. Resource issues were discussed in Chapter 1.

2.1 Alternative 1 – No Action Alternative

Under the no action alternative, the BLM would not issue the proposed ROW grants for well pads, bulklines, flowlines, access roads, pump stations with offices, and federal pore space. Without ROW grants across federal lands, the proposed action would not be constructed, CO_2 would not be injected into the BLM pore space, and ROW applications for future transmission lines would not be submitted. Due to the federal landownership patterns, the wells would not be developed, and the estimated 150 million tons of CO_2 would not be injected into the ground for sequestration. Current land use across the area would be expected to continue.

2.2 Alternative 2 – Proposed Action Alternative

Denbury submitted an SF-299 application for 30-year renewable ROW grants to construct, operate, maintain, and eventually terminate the following elements: well pads, bulklines, flowlines, access roads, pump stations with offices, and for use of federal underground pore space to sequester CO_2 in Carter County, Montana (see Figure 1 in EA Appendix D). Denbury also proposes analysis of an anticipated transmission line in a 100-foot corridor to the northern pump station and need for a transmission line to the southern pump station. Table 2-1 provides the ROW and proposed corridor acreages and approximate dimensions for each surface element on BLM-administered lands.

Table 2-1
Proposed ROW Surface Elements on BLM-Administered Lands

Project Surface Element	Approximate Dimensions	Approximate ROW Requirements (acres)
Well Pad Long-Term ROW (12)	300 feet x 300 feet	25
Well Pad Short-Term ROW (12)	150 feet x 150 feet	33
Bulklines Long-Term ROW	22.4 miles x 50 feet	134
Bulklines Short-Term ROW	22.4 miles x 25 feet	81
Flowlines Long-Term ROW	12.5 miles x 50 feet	76
Road ROW[a]	41.7 miles x 25 feet	126
Pump Stations / Offices (2)	660 feet x 330 feet	10
Electric Transmission Line Corridor to Pump Station North	2.3 miles x 100 feet	25[b]
Electric Transmission Line Corridor to Pump Station South	Unknown	0
	TOTAL	**510**

[a] Road ROWs include existing developed roads (14 miles), existing two-tracks (25 miles), and new access roads (4 miles).
[b] Includes acreage within a 100-foot-wide corridor used for this analysis. Actual ROW width is expected to be narrower. The transmission line would be constructed, and the ROW would be maintained by Southeastern Electric Cooperative. Actual ROW impacts will be assessed in a separate ROW application.

Subsurface formation pore space that would be utilized for CO_2 sequestration and storage would include approximately 100,200 acres under BLM-administered lands to approximate depths of 5,200 feet to 8,400 feet below ground surface. Denbury estimates injecting approximately 150 million tons

of CO_2 over the course of 20 years. This is equivalent to annual GHG emissions from more than 1.6 million cars.

The Project location and subsurface pore space formation were selected based on the proximity to existing CO_2 pipelines; the suitability of the reservoir porosity, capacity, and seal continuity; and the low risk of seismic activity. In addition, the proposed location includes three landowners (the BLM, State of Montana, and a private landowner) in an area with low mineral development potential. Section 3 of the POD provides additional information about the geology of the Project area, including details of the storage intervals and sealing formations.

Denbury would develop the Project in stages with the first group of activities involving construction of one stratigraphic test well, followed by a sequential build-out of up to 15 injection wells, associated infrastructure, and CO_2 injection over a 20-year period. Because the full build-out of the Project would take place over a 20-year period, the Project sequence would not occur linearly for the overall Project. The permitting, construction, and injection stages for any group of wells (and associated infrastructure) would overlap. The proposed Project sequence is shown in Figure 3 in EA Appendix D.

2.2.1 Proposed Action Design Features

The POD contains an extensive amount of design features and applicant-committed resource protection measures for all phases of the Project, which were incorporated and analyzed as part of the proposed action. This EA lists design features and applicant-committed measures in multiple sections to address specific components in the section. To limit repetition, key measures are summarized below. The POD, including details of related resource plans and protection measures, is available on BLM's ePlanning website[3]. All applicant committed measures and design features in the POD would be enforceable by BLM through the ROW grants, if approved.

Denbury would conduct construction, drilling, routine maintenance, and reclamation activities, including vegetation clearing, between July 16 and November 30 in any given year to minimize disturbance to nesting and habitats associated with migratory birds, bald eagles, golden eagles, sage-grouse, and big-game. In addition, for water resources, vehicle and equipment servicing and refueling activities would take place at a minimum of 500 feet from the outer edge of riparian areas, wet areas, and drainages.

Additional resource protection measures including fugitive dust control, measures to reduce or eliminate erionite exposure, mosquito control, spill prevention and containment measures, and invasive and noxious weed control measures would also be employed.

A Reclamation, Mitigation, and Monitoring Plan outlines temporary erosion and sediment controls and topsoil management, reclamation, and revegetation practices that would be used for interim reclamation of temporarily disturbed areas and final reclamation upon completion, abandonment, and removal of the proposed facilities. It specifies use of BLM-recommended seed mixes that would facilitate the re-establishment of native vegetation and promote the succession of sagebrush establishment and recovery. A third-party environmental inspector would be employed to provide oversight, monitor, and report on compliance with the ROW stipulations, permit conditions, and procedures and commitments outlined in the POD and associated appendices during construction and reclamation activities.

[3] Available at https://eplanning.blm.gov/eplanning-ui/project/2026556/510.

A comprehensive Noxious Weed Management Plan would be implemented to prevent the expansion or eliminate the occurrence of invasive, non-native, or noxious weed species within the proposed ROWs. As stated in Section 1.7.3 above, Denbury initiated the monitoring and treatment of noxious weeds within the proposed ROWs and additional BLM lands surrounding the proposed ROWs in 2022, 2023, and 2024. Noxious weed management will continue annually in close coordination with the BLM and in accordance with approved Pesticide Use Permits throughout the life of the Project.

Denbury would coordinate with the appropriate agency (BLM, Carter County, Montana Department of Transportation, etc.) and emergency response organizations to minimize traffic disruptions. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. Access to existing public roads would be maintained during construction. Monitoring would occur throughout all stages of the Project including prior to construction, during operation, and after reclamation.

A BLM-approved paleontologist would monitor construction activities during ground disturbance activities, and unanticipated discovery plans would be implemented if any paleontological or cultural resources are encountered. The Carter County Museum would be invited for monitoring of construction activities.

Denbury would procure water for dust suppression and hydrostatic testing from off-site permitted sources in Baker, Ekalaka, and/or Broadus. Water will be obtained through permits or purchase contracts with owners of valid, existing water rights. Denbury would obtain water use permits from the Montana Department of Natural Resources & Conservation (DNRC), as required.

Pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a SCADA system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed.

Injection wells would be monitored in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Denbury would prepare a Testing and Monitoring (T&M) Plan and a Quality Assurance Plan for EPA review and approval during the UIC Class VI permitting process. The T&M Plan must include installation and use of continuous recording devices to monitor injection pressure, rate, and volume [40 CFR §146.90(b)]. The T&M Plan must be periodically reviewed at a frequency no less than once every 5 years to incorporate monitoring data that has been collected [40 CFR §146.90(j)]. Denbury must provide the EPA with semi-annual reports containing the monthly volume and/or mass of the CO_2 stream injected over the reporting period and the volume injected cumulatively over the life of the Project [40 CFR §146.91(a)(5)]. Additionally, Denbury must also report to EPA according to the Project's Monitoring, Reporting, and Verification (MRV) Plan (40 CFR §98.448), which requires monitoring, reporting and verification to quantify CO_2 leakages and volume injected. To monitor the area for induced or natural seismicity, Denbury would install a private, passive monitoring array and may additionally utilize public data including, but not limited to, USGS or university networks.

Additionally, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR §146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR §146.85(a)(2)].

As described in Section 1.7.1, Denbury would implement an Emergency Response Plan for the Project (POD Appendix W) that details how Denbury would address potential emergencies in compliance with USDOT PHMSA and EPA UIC Program Class VI regulatory requirements and following the American Petroleum Institute's *CO_2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO_2)*(2023).

At the time of abandonment, Denbury would obtain any required authorizations from the BLM Authorized Officer or Montana State Lands Agent to abandon the well sites and associated facilities. Post-injection plugging, monitoring, and injection well closeouts would be completed in accordance with the EPA UIC permit. All infrastructure and facilities would be removed and disposed of or recycled in approved locations. Re-grading and revegetation of disturbed areas would be completed according to BLM standards and requirements, the procedures described in the POD, and Denbury's Reclamation, Mitigation, and Monitoring Plan.

2.2.2 Description of Proposed Action Elements

Pipelines (Bulklines and Flowlines)

Denbury proposes to construct and operate approximately 23.7 miles of 16-inch diameter bulklines and 15.9 miles of 12-inch diameter flowlines on BLM land to transport CO_2 from the existing CCA pipeline to Class VI UIC injection wells. Approximately 1.3 miles of bulklines and 3.4 miles of flowlines would be constructed on State lands; no pipelines are proposed on private land. Approximately 35 miles (89%) of proposed bulklines and flowlines are co-located with previously disturbed areas including utility and road corridors, where practicable, to minimize disturbance and avoid sensitive surface resources. Information from the resource surveys was used to design and reroute pipelines to avoid and minimize disturbances to sensitive resources (e.g., habitat, nests, leks) to the greatest practicable extent. Trenchless construction techniques (e.g., horizontal directional drilling) would be used to avoid impacts to waterways and minimize disturbances in wetlands. Pipelines would be constructed in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195.

The ROW for 16-inch bulklines would consist of a 50-foot-wide permanent ROW with a 25-foot-wide short-term ROW for temporary workspace. For the 12-inch flowlines, the permanent ROW would also be 50 feet wide, and no temporary workspace would be required during construction due to the reduced workspace requirements for smaller diameter pipes. See POD Section 4.2 and POD Appendix C for more details.

Table 2-2
Pipeline Construction and Operation Requirements (acres)[a]

Project Element	BLM	State	Private	Total
Bulkline Length (miles)	22.4	1.3	0.0	23.7
Bulkline Permanent ROW (acres)	134.5	7.9	0.0	142.4
Bulkline Short-term ROW (acres)	81.3	4.6	0.0	85.9
Flowline Length (miles)	12.5	3.4	0.0	15.9
Flowline Permanent ROW (acres)	76.4	20.4	0.0	96.7
Flowline Short-term ROW (acres)	0.0	0.0	0.0	0.0
Total Pipeline ROW Requirements (acres)	76.4	20.4	0.0	96.7

[a] All mileages and acreages are approximate and derived from GIS. Acreages and mileages are based on NAD 1983 Albers BLM MT ND SD projection.

Well Pads

The proposed action would include construction of 12 well pads on BLM land. Three well pads would also be constructed on State land, and none proposed on private land. The well pads would be used to drill and operate UIC Class VI injection wells to inject CO_2 into deep saline formations. An initial stratigraphic test well would be constructed on State land and permitted by the Montana Board of Oil and Gas Conservation (BOGC), and a UIC permit would be submitted to EPA to convert it to Injection Well 03. The conversion of this well to an injection well, and each subsequent injection well, would be subject to UIC regulations, SDWA provisions, and Class VI permit requirements. The EPA has authority for the administration of the Class VI UIC program, and EPA permits and authorizations must be obtained to construct (i.e., drill), operate, and terminate UIC Class VI wells. The well pads would be approximately 450-feet-wide by 450-feet-long (approximately 4.6 acres each) during construction. Well pads would be reduced to an operational area of 300-feet-wide by 300-feet-long (2.1 acres each). An approximately 20-foot-wide by 20-foot-long by 8-foot-tall shed that would house monitoring equipment and valves would be constructed at each well. The metal sided sheds would be painted Carlsbad Canyon in accordance with BLM requirements to minimize impacts and blend in with the surroundings. Well pad construction and operation are described in POD Section 4.4. Each 300-foot-wide by 300-foot-long well pad would be graveled during the operation stage of the Project. Gravel would be removed, contours restored to the extent practicable, and disturbed areas would be revegetated after the wells are abandoned and the site is reclaimed. See POD Section 4.4 and POD Appendix C POD for more details.

Table 2-3
Well Pad Construction and Operation Requirements (acres)[a]

Project Element	BLM	State	Private	Total
Well Pad Permanent ROW	24.80	6.20	0.00	31.00
Well Pad Short-term ROW	30.46	8.21	0.00	38.67
Total Well Pad ROW Requirements	55.26	14.41	0.00	69.67

[a] All acreages are approximate and derived from GIS. Acreages are based on NAD 1983 Albers BLM MT ND SD projection.

Roads

Denbury would access the Project using approximately 57 miles of access roads, of which approximately 42 miles are on BLM lands. Twenty-five miles (14 miles on BLM lands) are existing developed roads (Lone Tree Road, Hammond Road, and Ridge Road) that may require maintenance including surface grading, rolling, gravel additions, and/or replacement of existing infrastructure (i.e., cattle guards, culverts). An agreement with Carter County would be in place prior to use. Approximately 27 miles of existing two-tracks (25 miles on BLM lands) and five miles of new two-tracks (four miles on BLM lands) that would be scattered throughout the Project area would also be used. Two-tracks would be maintained as such to deter increased vehicle travel, and weed-free mats would be used to facilitate access for construction equipment and/or drill rigs during wet conditions. The five miles of new two-tracks would be restored to preconstruction conditions during final reclamation. See POD Section 4.3 and POD Appendix C for more details.

Table 2-4
Access Road Permanent ROW Requirements[a]

Project Element	BLM	State	Private	Total
Existing Developed Road ROWs	13.6 miles 44.10 acres	1.5 miles 6.20 acres	9.5 miles 29.97 acres	24.6 miles 80.27 acres

Project Element	BLM	State	Private	Total
Existing Two-Track ROWs	24.5 miles 74.33 acres	2.9 miles 8.66 acres	0.0 miles 0.00 acres	27.4 miles 82.99 acres
New Access Road ROWs	3.6 miles 10.97 acres	1.3 miles 3.80 acres	0.0 miles 0.00 acres	4.9 miles 14.77 acres
Total Access Road ROW Requirements	41.7 miles 129.40 acres	5.7 miles 18.66 acres	9.5 miles 29.97 acres	56.9 miles 178.03 acres

[a] All mileages and acreages are approximate and derived from GIS. Acreages and mileages are based on NAD 1983 Albers BLM MT ND SD projection. Short-term ROW for access roads would not be required.

Pump Stations (North and South)

The action includes construction, operation, maintenance, and termination of two pump stations that would measure CO_2 flow from the CCA Pipeline and raise the CO_2 pressure for well injection, if necessary. Two single-story metal office buildings, each about 12 feet wide by 42 feet long by 20 feet tall, would also be constructed at each approximately 5-acre site. The buildings would be painted Carlsbad Canyon to blend into landscape. A chain link fence would be constructed to surround the entire facility and would be painted the same color as the building. Each site would be surfaced with gravel. Upon completion of the Project and after injection wells are plugged, Denbury would remove the pump stations and reclaim the areas in accordance with terms and conditions of the ROW agreement with the BLM. See POD Section 4.6 and POD Appendix F for more details**.**

Table 2-5
Pump Station Permanent ROW Requirements (acres)[a]

Project Element	BLM	State	Private	Total
Pump Station North ROW	5.0	0.0	0.0	5.0
Pump Station South ROW	5.0	0.0	0.0	5.0
Total Pump Station ROW Requirements	10.0	0.0	0.0	10.0

[a] All acreages are approximate and derived from GIS. The acreages are based on NAD 1983 Albers BLM MT ND SD projection. Short-term ROW for pump stations would not be required.

Proposed Corridor: Electric Transmission Line to Pump Stations North and South

For analysis purposes, Denbury proposes a 100-foot corridor for a transmission line to Pump Station North. A ROW application for the corridor was not submitted as part of the proposed action because it is anticipated that prior to Group 2 construction, the owner operator of the transmission line, Southeastern Electric Cooperative, would submit a separate subsequent ROW application for the power line within the proposed corridor. The actual ROW width is expected to be less than 100 feet. Based on coordination between Denbury and Southeastern Electric Cooperative, an upgrade to about 1.2 miles of overhead electric distribution line on private property and a 3.6-mile extension of the existing power line is anticipated. Of these 4.8 miles of new and upgraded 240-kilovolt power line, approximately 2.3 miles would be on BLM land. The proposed route would be co-located along the existing Lone Tree Road to the extent practicable and along the CCA Pipeline ROW. Poles would be 24 feet tall and constructed to avoid wetlands, streams, and riparian areas. See POD Section 4.7 and POD Appendix C for more details.

Denbury anticipates a second transmission line will be required to provide power to Pump Station South, part of the Group 5 facilities. It is anticipated that Southeastern Electric Cooperative would also service the necessary power. Because of the extended timeframe on the Project to complete Group 5, there may be potential changes to transmission services in the area. As result, the transmission line corridor to Pump Station South is unknown at this time. Prior to initiating Group

5 construction, Denbury would coordinate with Southeastern Electric Cooperative to submit a separate application a ROW with a proposed route across BLM lands.

Adherence to the best practices listed in the *Avian Power Line Interaction Committee's Suggested Practices for Avian Protection on Power Lines* (Avian Power Line Interaction Committee 2006) and BLM-requested design features will be addressed in Southeastern Electric Cooperative's ROW application and review process for each electric transmission line.

Table 2-6
North Electric Transmission Line Corridor[a]

Project Element	BLM	State	Private	Total
Existing Electric Transmission Line Length (miles)	0.0	0.0	1.2	1.2
Proposed Electric Transmission Line Length (miles)	2.3	0.0	1.3	3.6
Existing Electric Transmission Line 100-foot-wide corridor [b] (acres)	0.0	0.0	14.5	14.5
Proposed Electric Transmission Line 100-foot-wide corridor [b] (acres)	25.4	0.0	19.0	44.4

[a] All mileages and acreages are approximate and derived from GIS. The acreages are based on NAD 1983 Albers BLM MT ND SD projection.
[b] Includes acreage within a 100-foot-wide corridor used for this analysis. Actual ROW width is expected to be narrower. The transmission line would be constructed, and the ROW would be maintained by Southeastern Electric Cooperative. Actual ROW impacts would be assessed in a separate ROW application.

Pore Space

Denbury would inject CO_2 into the pore space of subsurface formations within an approximately 110,100-acre Project area that is owned / managed by the BLM, the State of Montana, and a private landowner. Pore space ownership acreages are provided in Table 2-7.

Table 2-7
Subsurface Pore Space Ownership (acres)[a]

Project Element	BLM	State	Private	Total
Pore Space	100,200	8,500	1,400	110,100

[a] All acreages are approximate and derived from GIS. The acreages are based on NAD 1983 Albers BLM MT ND SD projection.

The Project location and subsurface pore space formation were selected based, in part, on its suitable reservoir porosity, capacity, and seal continuity. CO_2 plumes would be vertically confined by low permeability shales and mudstones within an EPA delineated Area of Review (AoR)[4] extending out from each injection well inside the Project area. Detailed analysis and predictive modeling would be performed as part of the UIC Class VI permitting process to define the AoR, verify the ability of the shales and mudstones to limit the vertical migration of CO_2, and protect overlying USDWs from the leakage of CO_2 and brine, dissolution of heavy materials, or leaching of organic compounds. Additional discussion of USDW protection is included in Section 3.6.

2.3 Alternatives Considered but Eliminated

One alternative considered by not analyzed was the initial November 2021 proposal. Multiple factors such as natural resources and associated habitats, existing disturbances, visual resources,

[4] The AoR is modeled using the physical and chemical properties of all phases of the injected CO_2 stream; the pressure front that develops around the CO_2 plume; and available site characterization, monitoring, and operational data. In accordance with 40 CFR §146.84, Denbury must prepare, maintain, and comply with a plan to delineate the AoR, periodically reevaluate the delineation, and perform corrective action that meets regulatory requirements and is approved by the EPA UIC Director.

and topography influenced the initial proposed Project design submitted in November 2021. Compared to Alternative 2 above, the initial Project design included:

- an additional 10-miles of linear infrastructure (i.e., bulklines, flowlines, and access roads), of which about 8 miles were sited on BLM-administered lands;
- an additional approximately 40% (5,650-acre) increase in overall disturbance, including an additional 50% (6,600-acre) of disturbance on BLM-administered lands; and
- an additional approximately 50% (1,300-acre) increase in disturbances to sensitive resources (i.e., wetlands, waterbodies, lek habitat, and invasive species populations), including an additional 55% (1,050-acre) increase in disturbance on BLM-administered lands.

Due to resource surveys, the initial Project design was refined to meet 2015 MCFO RMP requirements, avoid and/or minimize disturbances to sensitive resources, and to make use of previously disturbed areas to the extent practicable. The proposed bulkline and flowline locations were moved to parallel existing developed and two-tracks, where practicable, resulting in 89% (35.1 miles) of co-location with existing roads. Bulkline 1 was relocated adjacent to the existing CCA pipeline, which would reduce the amount of new ROW needed to construct and operate the pipeline. Well pads were relocated closer to existing roads to reduce the lengths of new road construction and to avoid sage-grouse leks and surrounding sensitive habitat. An approximately 7-mile electric transmission line ROW that was initially proposed extending north of the Project area and a new electric substation were eliminated from the design for upgrading and extending an existing electric distribution line from the east.

The second alternative considered but not analyzed was siting the Project outside of PHMAs. An alternate Project location outside of PHMAs was not proposed because the underground pore space at the proposed Project location is identified to have suitable reservoir porosity, capacity, and seal continuity, and it would be located along Denbury's existing CCA pipeline. As part of the Project siting process, Denbury evaluated geological selection criteria for potential sequestration sites along the CCA pipeline ROW in southeastern Montana including reservoir depth, thickness, porosity, permeability, structure, seal integrity, salinity, and geochemical compatibility with the CO_2. The Miles City arch, a regional anticline located between the Williston Basin and Powder River Basin, offers favorable structural conditions for CO_2 containment (see POD Figure 3-1). Figure 3-2 in the POD illustrates the structure of the Miles City arch and the location of Denbury's existing CCA pipeline, which currently transports CO_2 from the Bell Creek Oilfield in Powder River County to the CCA Enhanced Oil Recovery unit development in Fallon County and would be used to transport CO_2 to the proposed sequestration site. Areas north and west of the proposed Project site (shown in blue on POD Figure 3-2) are deeper formations that present limitations that make them less suitable for CO_2 sequestration. Conversely, formations to the south of the proposed Project site, shown in orange and yellow, are too shallow to maintain CO_2 in a supercritical state. While the area southeast of the Project site (shown in green) may meet some geological criteria, the location would not align with the existing CCA pipeline, and locating the Project there would necessitate significant new pipeline construction. Furthermore, well log data and publicly available geological information confirm that there are three major seals at the proposed Project location, and the identified formations exceed the minimum depth requirements of 2,600 feet below ground surface for the storage of CO_2 in a supercritical state. The multiple stacked reservoir architecture increases the potential reservoir storage efficiency. Relocating the Project from its proposed location may not meet the necessary UIC permit requirements and would require construction of additional pipeline infrastructure. Therefore, no alternative locations along the existing CO_2 pipeline or outside of PHMAs were proposed for further consideration.

3 Affected Environment and Environmental Consequences

3.1 General Setting

The proposed Project area is located in the Northwestern Great Plains ecoregion and within the Central Rocky Mountain Foreland physiographic province of the unglaciated Missouri Plateau. The province consists predominantly of gently rolling plains with shallow creek valleys and broad flat divides. The landscape is semiarid with infrequent badland areas. Existing land cover includes grassland and sagebrush shrubland (USGS 2021).

3.2 Reasonably Foreseeable Environmental Trends and Planned Actions

There are ongoing activities in and around the area which include livestock grazing, noxious weed control, dispersed recreation/hunting, existing ROWs, oil and gas development in adjacent counties, and agriculture on privately owned lands.

The North Plains Connector was considered as a reasonably foreseeable future action in the area that has the potential to affect resources similar to those considered for analysis under the proposed action. The North Plains Connector is an approximately 420-mile, high voltage, direct current transmission line that would connect U.S. eastern and western electric grids (Grid United 2025). The transmission line would extend from Colstrip, Montana to Morton and Oliver Counties, North Dakota and would cross BLM-administered land in the MCFO. The ROW application for the North Plains Connector has been submitted to the BLM for processing. The proposed route is outside of Carter County and the Draft Environmental Impact Statement (EIS) is anticipated in winter 2025; therefore, this transmission line project is not included in this analysis.

3.3 Resource Issue 1 – Air Resources and Greenhouse Gas Emissions

3.3.1 Affected Environment

The air resources section addresses regional ambient air quality, potential impacts to air resources, and GHG emissions from the proposed action. Specific impacts associated with the build-out (construction and drilling) and operation of the proposed action are identified throughout this EA and generally encompass construction, drilling, and operational activities associated and connected with the proposed action. Emissions evaluated in association with the proposed action include mobile combustion emissions from construction and drilling as well as personnel commuting, road travel, and emissions associated with the operation of the CO_2 pipeline, pump stations, and underground CO_2 storage.

Ambient Air Quality

Emissions of criteria air pollutants may impact human health and welfare by contributing to the deterioration of ambient air quality. The specific extent that a source of emissions may impact air quality is affected by the regional weather patterns, nearby terrain, and background concentrations, but generally, air quality emissions tend to disperse from their initial source. Thus, the highest concentrations of these pollutants are likely to occur near the emission sources, and the impacts of emissions on human health would be within the areas immediately surrounding an air pollutant source. Both the Montana Department of Environmental Quality (MDEQ) and the EPA have established primary and secondary ambient air quality standards to protect human health and

environment called Montana Ambient Air Quality Standards (MAAQS) and National Ambient Air Quality Standards (NAAQS), respectively. The pollutants regulated by the NAAQS and relevant to the proposed action are briefly summarized below:

Carbon Monoxide (CO): CO is a colorless, odorless gas primarily produced by incomplete combustion in stationary and mobile sources.

Nitrogen Dioxide (NO_2): NO_2 is a compound primarily produced by the combustion of fossil fuels in stationary and mobile sources. Some oxides of nitrogen (NO_x) convert into NO_2 after being emitted and are thus regulated as precursor pollutants.

Ozone (O_3): O_3 is rarely directly emitted into the atmosphere from sources. Rather, O_3 is formed by chemical reactions between NO_x and VOCs in the presence of sunlight. NO_x and VOCs are both regulated as precursor pollutants.

Particulate Matter (PM): Respirable PM with a diameter of less than 10 microns (PM_{10}) and fine PM with a diameter of less than 2.5 microns ($PM_{2.5}$): PM_{10} and $PM_{2.5}$ are emitted from a variety of sources, including agricultural operations, industrial processes, combustion, construction and demolition activities, road dust, windblown dust, and wildfires.

Sulfur Dioxide (SO_2): SO_2 is a sulfur compound emitted by power plants, industrial facilities, combustion in mobile sources, and natural sources such as volcanoes.

It should be noted that the MAAQS are more stringent than the national standards for some pollutants. States determine compliance with the air quality standards using a variety of methods such as ambient air quality monitoring stations, air quality design values, and computer modeling. The MDEQ is the delegated authority under the federal Clean Air Act (CAA) to complete air quality monitoring and has installed and maintained air quality monitoring stations throughout the state, including counties located near the proposed Project area (https://deq.mt.gov/files/Air/AirMonitoring/Documents/2023_ANMP.pdf). Based on the nearby ambient monitoring network and additional EPA analysis, Carter County and the lands associated with the Project are currently designated attainment/unclassifiable for the NAAQS under the CAA. Note that Carter County, where the Project is located, does not currently have active monitoring stations.

The two nearest air quality monitoring stations are the Miles City-Pines Hills monitor 30-075-0001 and Broadus monitor 30-017-0005 located in Miles City (Custer County) and Broadus (Powder River County), Montana, respectively. Monitoring station locations are shown in Figure 4 in EA Appendix D. Monitors were selected based on proximity to the Project area and the availability of sufficient data; a minimum of 3 years of data is required to compare background concentrations of certain criteria pollutants to their regulatory standards (NAAQS). The Miles City-Pines Hills monitor became active in 2022 and does not have three years of monitoring data. The nearest ambient air quality site is the Broadus site, located 63 kilometers ([km], approximately 39 miles) southwest from the center of the Project area. It is a reasonable assumption that Carter County would have similar air quality to Powder River County. Table 3-1 provides ambient background concentrations of criteria pollutants that the MDEQ measured at the Broadus site between 2020 and 2022. Each background concentration is compared to its regulatory standard (NAAQS).

Table 3-1
Criteria Pollutant Ambient Background Concentrations 2020-2022[a]

Pollutant	Location/County	Averaging Time	Concentration [b,c]	NAAQS	% NAAQS
$PM_{2.5}$ ($\mu g/m^3$)	Broadus, MT (Powder River)	Annual	7.6	9[d]	84%
$PM_{2.5}$ ($\mu g/m^3$)	Broadus, MT (Powder River)	24-hour	29.5	35	84%
O_3 (ppm)	Broadus, MT (Powder River)	8-hour	0.063	0.070	90%
NO_2 (ppb)	Broadus, MT (Powder River)	Annual	0.9	53	1%
NO_2 (ppb)	Broadus, MT (Powder River)	1-hour	9.3	100	5%

[a] Source: EPA Outdoor Air Quality Data Monitor Value Reports (https://www.epa.gov/outdoor-air-quality-data/monitor-values-report)

[b] Dataset includes all values (flagged exceptional events included).

[c] Background concentrations were calculated following the form of the NAAQS as designated in the CAA and summarized at https://www.epa.gov/criteria-air-pollutants/naaqs-table. The following calculations were used: $PM_{2.5}$ annual = the annual mean, averaged over 3 years; $PM_{2.5}$ 24-hour = the 98th percentile, averaged over 3 years; O_3 8-hour = the annual fourth-highest daily maximum, averaged over 3 years; NO_2 annual = the annual mean; NO_2 1-hour = the 98th percentile, averaged over 3 years.

[d] The $PM_{2.5}$ Annual NAAQS was updated on 2/7/2024 from 12 (µg/m3) to 9 (µg/m3).

Air Quality Related Values (AQRVs) for an area [including visual air quality (haze), and acid (nitrogen and sulfur) deposition] are not threshold standards, but levels of concern may be identified by the permitting authority. Atmospheric visibility is a measure of how far and how well an observer can see a distant and varied scene. The visual range is the greatest distance in miles that a person can see a large dark object viewed against the horizon sky. Light extinction or attenuation is a nonlinear measure of visibility and occurs in the atmosphere as a result of scattering and absorption. Pollutants from natural and anthropogenic sources contribute to haze by scattering and absorbing light. A deciview (dv) is a unit of measurement used to quantify human perception of visibility and is calculated from the natural logarithm of atmospheric light extinction. One (1) dv is roughly the smallest change in visibility (haze) that is barely perceptible. Because visibility at any one location is highly variable seasonally throughout the year, it is characterized by three groupings: 1) clearest 20% days, 2) average 20% days, and 3) haziest 20% days.

The Interagency Monitoring of Protected Visual Environments (IMPROVE) program collects visibility data at the Northern Cheyenne Reservation (NOCH1), as shown in Figure 5 in EA Appendix D (Federal Land Manager Environmental Database 2024). Average visual range is 60 to 90 miles (100 to 150 km) in many Class I areas in the western United States, equivalent to 13.6 to 9.6 dv, or about 50 to 70% of the visual range that would exist without anthropogenic air pollution from stationary and mobile sources (64 Fed. Reg. 35714). From 2000 to 2020, visibility data at NOCH1 has shown an improving trend for the clearest and haziest days. In general, measurements at IMPROVE sites in the region show improvement in visibility, since the first decade of the twenty-first century, by approximately 1 dv for the haziest days and 2 dv for the clearest days.

Atmospheric deposition occurs when gaseous and particulate air pollutants are deposited on the ground, waterbodies, or vegetation. The pollutants may be deposited as dust or transported from the atmosphere in the form of rain, fog, or snow. When air pollutants such as sulfur and nitrogen are deposited into ecosystems, acidification or enrichment of soils and surface waters may occur. Atmospheric nitrogen and sulfur deposition may affect water chemistry, resulting in impacts to

aquatic vegetation, invertebrate communities, amphibians, and fish. Deposition can also cause chemical changes in soils that alter soil microorganisms, plants, and trees. Although nitrogen is an essential plant nutrient, excess nitrogen from atmospheric deposition can stress ecosystems by favoring some plant species and inhibiting the growth of others. Information on wet and dry deposition at Class I areas within the analysis area can be found at EPA's Clean Air Status and Trends Network monitoring program at https://www.epa.gov/castnet/castnet-site-locations.

Air quality and AQRVs are influenced by industrial sources, motor vehicles, agricultural practices, long-range emissions transport, and natural sources such as wildfire smoke. Projections of regional air quality on BLM lands is documented in several BLM reports such as the 2015 MCFO RMP (BLM 2015), 2016 Montana/Dakotas State Office Photochemical Grid Modeling (PGM) Modeling Study Air Resources Impact Assessment–Final Report (BLM 2016), 2024 Final MCFO SEIS, and North Dakota Field Office Draft RMP and EIS (BLM 2024a). The 2015 and 2023 MCFO RMP evaluated near field impacts to air quality from oil and gas development as well as projections of visibility within the region, and the PGM study assessed regional impacts to air quality from future oil and gas development on BLM administered mineral estate in Montana, North Dakota, and South Dakota. The modeling (i.e., emissions and impact) scenarios did not produce emissions more than the NAAQS or state ambient air quality standards for O_3, $PM_{2.5}$, PM_{10}, SO_2, NO_2 or CO. However, the modeling study predicted impacts to visibility at Class I areas in eastern Montana and western North Dakota, in which a portion of the predicted impacts can be attributed to oil and gas development in the Bakken Formation and future federal oil and gas development (more than 0.5 and 1.0 dv thresholds) but not near the proposed Project area.

When discussing the effects of the proposed action, it must be noted that the affected environment varies in size depending on which of the specified impacts are being evaluated. With respect to impacts to ambient air quality and near-field visibility impacts, the areas near construction and subsequent operation of the proposed action would experience the highest pollutant concentration increases. Therefore, the affected environment in terms of the assessment of ambient air quality and near-field visibility impacts would be near (less than 50 km from) the proposed action. Additionally, a memorandum titled "Clarification of Prevention of Significant Deterioration (PSD) Guidance for Modeling Class I Area Impacts" was released by the EPA Office of Air Quality Planning and Standards in October of 1992. This memorandum states that typically Class I area analyses should be limited to sources that are located within 100 km of a Class I area. In some cases, large emitters (Title V and/or PSD facilities) outside of that 100 km radius from a Class I area should be analyzed in a Class I analysis. The nearest Class I are as noted above, the Northern Cheyenne Reservation, is approximately 130 km northwest of the proposed action. PSD reviews are triggered when a proposed project surpasses the emission thresholds set by federal or state permitting agencies. The proposed action is not expected to trigger these thresholds. Because the distance (greater than 100 km) and the minor source status of the proposed action, further analysis of impacts at the nearest Class I area were not evaluated.

EPA also regulates emissions of HAPs that are suspected to cause cancer or other serious health effects. Since the establishment of the CAA HAP list (CAA Section 112), the EPA has periodically modified the list through rulemaking. Currently, 187 pollutants are designated as HAPs (EPA 2022a). Typically, HAPs associated with urban or industrial development include formaldehyde, benzene, toluene, ethylbenzene, xylenes, and n-hexane. Emissions of these pollutants within the analysis area are mostly associated with tailpipe emissions from mobile sources. The EPA developed an AirToxScreen Mapping Tool to evaluate impacts from existing HAP emissions across the nation. Using the EPA AirTox Screen Mapping Tool, the total cancer risk for Montana was below the upper limit of acceptable lifetime risk of 100 in 1 million people to develop cancer, as described in 40 CFR

§300.430. In addition, the noncancer hazard index for Montana is below 1.0, indicating that air toxics will not likely cause adverse noncancer health effects.

Regulatory Setting

The MDEQ administers various air quality permitting and registration programs to ensure compliance with the MAAQS, NAAQS, and VOC/HAP emissions through compliance with applicable rules and regulations, emissions limitations, testing, and best available control technology determinations. Additionally, implementation of best management practices (BMPs) are required to limit fugitive emissions of PM (BLM 2015). The BMPs to manage fugitive dust include:

- designing roads and well pads to reduce the amount of fugitive dust generated by traffic or other activities;
- application of water, non-toxic chemical dust suppressant, or gravel on unpaved surfaces during construction or drilling projects and in high-traffic production operations; and
- implementing vehicle speed limitations.

Federal EPA regulations to protect ambient air quality include New Source Performance Standards (NSPS) for stationary sources promulgated under 40 CFR Part 60, which are designed to control criteria air pollutant emissions. NSPS does not currently regulate fugitive CO_2 emissions or other criteria pollutants for Class VI injection wells and is not applicable to the proposed Project. Similarly, National Emission Standards for Hazardous Air Pollutants promulgated under 40 CFR Part 61 and 63, which are designed to control HAP emissions, are not applicable to the proposed Project. A federal Title V Operating Permit Program also applies to all major stationary sources as specified in 40 CFR Part 70 of the CAA. The EPA has delegated authority to administer the program to the MDEQ. However, the proposed Project does not meet the definition of a major stationary source and is not applicable in this case.

Greenhouse Gas Emissions

The most common GHGs and their typical emission sources are as follows:

- Carbon dioxide: CO_2 is the most prevalent GHG and is produced by the combustion of fossil fuels, the combustion of biomass, and chemical reactions.
- Methane (CH_4): CH_4 is emitted from combustion, production of fossil fuels, livestock, agriculture, and municipal solid waste landfills.
- Nitrous oxide (N_2O): N_2O is emitted from combustion, agricultural activities, and industrial processes.

GHG emissions are typically quantified as carbon dioxide equivalent (CO_2e) emissions. Calculations of CO_2e emission rates combine all GHG emissions (in this case CO_2, CH_4, and N_2O emissions) into a single value considering the respective climate effects from each pollutant and are presented in terms of each pollutant's Global Warming Potential (GWP). Each GHG has a GWP that accounts for the intensity of each GHG's heat trapping effect and longevity in the atmosphere. The GWP for each GHG is provided in Table 3-2. For additional information on GWPs, refer to the Chapter 3 of the 2023 BLM Specialist Report on Annual GHG Emissions and Climate Trends (2024b).

Table 3-2
Global Warming Potentials and Atmospheric Lifetimes

Greenhouse Gas	Atmospheric Lifetime (years)[a]	Global Warming Potential (20-year time horizon)[a]	Global Warming Potential (100-year time horizon)[a]
Carbon dioxide (CO_2)	50–200	1	1
Methane[b] (CH_4)	12	82.5	29.8
Nitrous oxide (N_2O)	114	273	273
Sulfur hexafluoride (SF_6)	3,200	18,300	25,200

[a] Intergovernmental Panel on Climate Change (IPCC) Assessment Report 6 GWPs.
[b] CH_4-fossil; Methane from fossil fuel sources has a slightly higher emission metric than those from biogenic sources (CH_4-nonfossil = 79.7 and 27.0 for the 20-year and 100-year GWPs respectively).

The proposed Project area is located within the northern-central part of the Great Plains region of the United States. In the Northern Great Plains region, high temperature days (greater than 90°F) and cool days (less than 28°F) are expected to increase and decrease respectively by 30 days or more per year by mid-century. Winter and spring precipitation and the number of days with heavy downpours and snowfall are expected to increase (USGCRP 2018). Additional state level findings are described in the 2021 Montana Climate Assessment (Adams et al. 2021). Major findings of the climate assessment report include:

- Annual average temperatures, including daily minimums, maximums, and averages, have risen across the state between 1950 and 2020. The increases range between 2.0 and 3.0°F.
- More precipitation will be received in winter, spring, and fall with summers expected to become dryer than present. Overall increased precipitation that may be received by the state is expected to be offset by evaporation and transpiration due to higher average temperatures.
- Climate projections indicate continued warming in all geographic locations, seasons, and under all emission scenarios throughout the 21st century. By mid-century, Montana's temperatures are projected to increase by approximately 4.5–6.0°F.

These temperature and precipitation variations within the larger Northern Great Plains region and states, where the proposed action is located, will likely continue in the local area surrounding the proposed action with an increase in flooding, nutrient runoff, and soil erosion (USGCRP 2018). Increased winter temperatures can also lead to survival of pests and invasive weeds, which may impact local agriculture, terrestrial and aquatic ecosystems, and increase the pollen season for common allergens such as ragweed (USGCRP 2018). Increasing temperatures and number of days with temperatures over 100°F, as well as changing precipitation patterns, are likely to stress the local plant and animal populations (USGCRP 2018).

See the 2023 BLM Specialist Report on Annual GHG Emissions and Climate Trends for further discussion on climate impacts in the region (BLM 2024b)[5].

Regulatory and Policy Setting

GHGs are regulated under the CAA. In 2009, the EPA Mandatory Greenhouse Gas Reporting Program (GHGRP) codified 40 CFR Part 98, required the reporting of GHG data from large GHG emission sources (any facility emitting over 25,000 metric tons of CO_2e annually). The proposed Project is a Subpart RR source category under the GHGRP which requires Denbury to calculate

[5] Available at https://www.blm.gov/sites/default/files/docs/2025-04/BLM-2023-Base-GHG-Report.pdf

and report annual GHG emission to EPA's electronic Greenhouse Gas Reporting Tool. However, at this time, no federal agency has developed a regulatory standard or limitation to determine project significance related to GHGs and climate impacts.

3.3.2 Environmental Effects —No Action Alternative

The no action alternative would remove any potential direct or indirect impacts from the construction of the Project. Foregoing construction would avoid emission sources from construction equipment, drilling, dust, and fugitive emissions. Under the no action, any emission sources currently surrounding the Project area would continue to operate, and the area would be expected to continue to meet all NAAQS and MAAQS standards. The no action alternative would similarly eliminate any GHG emissions associated with the proposed action (4,734 tons CO_2e from construction and 205 tons/year CO_2e from operation, Table 3-3 and 3-4). However, the subsequential 150 million tons of CO_2 proposed to be injected as a result of this Project would not be sequestered.

Cumulative Effects

Air Quality

Under the no action alternative, the proposed action would not impact air resources and would not contribute to cumulative effects. Cumulative impacts to air quality related to the no action alternative would be derived solely from current and reasonably foreseeable future activities within the Project area and the larger BLM MCFO RMP area. The BLM MCFO recently evaluated potential cumulative air quality impacts in its Final SEIS that was published in May 2024 (BLM 2024a). The SEIS was prepared in response to a court order to complete a new coal screening and remedial NEPA analysis that considers no-leasing and limited coal leasing alternatives and discloses public health impacts of burning fossil fuels from the BLM MCFO planning area. The SEIS was prepared for the entire area managed by the BLM MCFO, approximately 2.7 million acres of BLM-administered surface lands and 11.9 million acres of BLM-administered mineral estate within 17 counties in eastern Montana, which includes the Project area. The SEIS analysis results provide an estimate of the expected air quality that could reasonably be foreseen in the Project area should the proposed Project not proceed. The SEIS Sections 3.3 and 3.4 are incorporated by reference and summarized below.

The SEIS quantifies annual emissions of criteria pollutants and HAPS based on current and reasonably foreseeable coal, oil, and gas development. Other BLM-authorized activities such as vegetation management, fire management, forestry and woodland products, livestock grazing, recreation, general BLM fleet travel, and road maintenance are incorporated into the air quality impacts analysis. The MCFO SEIS analyzed three action alternatives including a no action alternative, and it disclosed air quality as part of the analysis. Forecasted activity levels from oil and gas and other BLM-authorized activities are constant across the alternatives. Modeling for the alternatives with the highest downstream combustion impacts project future air quality and public health impacts would be similar when compared to present conditions. Overall, cumulative impacts in Montana from all sources included in the circa 2028 modeling are predicted to be below the NAAQS and MAAQS for NO_2 and SO_2 with O_3, $PM_{2.5}$, and PM_{10} exceeding the standards in isolated areas throughout the state, mostly from the modeled natural source group that includes fires, biogenic emissions, windblown dust, and lightning NO_x. The contributions from federal oil and gas and federal coal development are less than 1% at the location of the potential exceedances.

Furthermore, modeled cumulative nitrogen deposition is below the lowest critical load in Montana except at Fort Peck Reservation, Lostwood Wilderness, Medicine Lake Wilderness, North

Absaroka Wilderness, Theodore Roosevelt, and Washakie Wilderness which are located outside the Project area. Contributions are minimal at these locations from the federal coal and oil and gas sectors and never exceed more than 2% of the total nitrogen deposition. Sulfur deposition was below the critical load over the MCFO RMP area. For the proposed Project area, cumulative impacts from all sources are predicted (i.e., from all sources circa 2028) to be below the NAAQS and MAAQS as well as below nitrogen and sulfur deposition critical loads. For additional information, please refer to the 2024 Final MCFO SEIS.

Greenhouse Gas Emissions

Cumulative emissions of GHGs related to the no action alternative would be derived from current and reasonably foreseeable activities within the proposed action Project area and larger MCFO RMP area since the no action alternative would eliminate all direct and indirect GHG emissions from the proposed action. MCFO SEIS (2024) evaluated GHG emissions from the mining, transportation, and downstream combustion of federal coal produced at the two active mines separately for existing, pending, and potential future subsequent federal coal leases. The forecasted activities from oil, gas, and other BLM-authorized activities are constant across alternatives. In the alternative with the highest emissions, an estimated 584.4 million metric tonnes CO_2e are expected based on 20-year GWPs and accounting for federal coal direct, processing, transportation, and downstream combustion activities. Federal oil and gas and non-federal emissions are the same across all alternatives. .

3.3.3 Environmental Effects—Alternative 2 (Proposed Action)

The proposed action would include the construction and operation of the following elements on BLM-administered lands: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO_2.

Criteria air pollutants, HAPs, and GHGs emissions would result from four primary categories of activities: 1) road fugitive emissions from personnel commuting and equipment mobilization; 2) surface disturbance related to construction; 3) use of nonroad mobile and portable equipment for construction and well drilling; 4) operating and maintaining field assets. The air pollutant emissions resulting from construction and drilling of the proposed action would occur intermittently over a large area and over a period of several years. Construction and drilling is planned to be completed in eight groups. The air quality analysis was completed using the assumption that each construction group's activities would be completed in one year, which would present the most conservative estimation of air emissions relating to construction and drilling activities. Therefore, construction and drilling impacts to air quality are based on group one through eight activities assumed to start in year 2026, the estimated disturbed surface area, and estimated personnel travel. Construction and drilling emissions associated with the proposed action would occur from July through November of each year. The construction and drilling emissions for the proposed action are provided in Appendix E of this EA. Cumulative GHG emissions associated with construction, drilling, and CO_2 that would be sequestered by the Project are discussed in the cumulative effects section.

The sequestration of 150 million tons of CO_2 would be made possible through construction and drilling of the proposed action. The expected direct emissions are from fugitive emissions at the new well pads and from the constructed CO_2 pipeline. Indirect effects of the Project, such as increased traffic on the new roads, are not expected to have a large impact on air quality due to the rural nature of the Project. Exhibits 1–11 of the Air Quality Analysis Calculations (EA Appendix E) present estimated rates of air pollutant emissions that would result from field construction, drilling, operations, as well as an estimate CO_2 sequestration timeline.

Air Quality

The air quality analysis provided was developed based upon a reasonably defined boundary of the Project's direct impacts. As such, direct air emissions for criteria pollutants and GHGs were quantified for construction activities, and indirect air emission from drilling and operational phases of the proposed Project are discussed below. Reference Section 3.2.1 for specific information on the impacts and regulatory status of criteria pollutants and GHGs.

The air quality analysis is based upon the best engineering planning information available at the time and reasonable assumptions. Assumptions have been made regarding equipment quantities and operational periods as the construction schedule has not been finalized at this stage. Furthermore, the boundary of this analysis was limited strictly to air quality impacts from construction, drilling, and operational periods that would occur within the affected airshed. The following non-inclusive list of assumptions was utilized to define the limits of these boundaries.

- The affected airshed is assumed to be limited to Carter County, a designated NAAQS attainment area under the CAA.
- Upstream emissions from construction materials and equipment are beyond the scope of this analysis.[6]
- Upstream emissions from the sourcing of CO_2 that is being sequestered is beyond the scope of this analysis.[6] As described in POD Section 1.2, specific sources of CO_2 for the Project have not yet been identified because several stages in the Project sequence (see Figure 3 in EA Appendix D) will need to occur before contracts with emitters to permanently sequester CO_2 are secured; therefore, the quantity, type, and location of emissions sources for the Project are unknown at this time. The extended timeframe to develop the Project, which is proposed as a sequential build-out of up to 15 injection wells requiring EPA approval, associated infrastructure, and CO_2 injection over a 20-year period, creates further uncertainty in CO_2 sources that may be available during the Project's injection period. Furthermore, any upstream CO_2 sources would be existing and independent of this Project. As such, they would be subject to regulatory requirements of the EPA and/or states in which they are located, to ensure emissions do not exceed or violate any state or federal air quality standards under the CAA.
- Twelve wells would be sited on BLM land, and three wells would be sited on State land. For this analysis, the emissions from the construction, drilling, and operation of all 15 wells and their associated infrastructure (i.e., pipelines, roads) are included due to the interconnected nature of the operational equipment.
- Injection wells would not require an additional energy source to operate; the wellhead would operate on induced pressure.
- Two electric pump stations would be constructed and operated as a part of the Project. This analysis does not analyze emissions associated with the purchase of electricity for the operation of these stations (scope 2 emissions).

[6] In Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that, under NEPA, federal agencies are not required to evaluate upstream or downstream environmental effects that are remote in time or location from the proposed action, unless those effects are sufficiently foreseeable and causally connected.

- Construction and drilling for each ROW Group is assumed to occur seasonally (July – November) between the years of 2026 and 2035. Therefore, even though BLM is not the authorized agency for UIC Class VI permits, construction emissions are assumed to include drilling emissions disclosed in the direct emissions.
- Operational emissions would continue year-round for 20 years after the completion of construction in 2035, and a 50-year post-closure monitoring period will occur.
- Operational emissions are limited to employee commuting, fugitive losses from pipelines, and any assumed fugitive leak rates from the pump stations, wellheads, or underground CO_2 storage. The proposed Project is a carbon sink, therefore, there are no additional downstream emission sources.

In-depth information regarding the assumptions and methodology utilized in the air quality analysis is located in Appendix E of this EA. The following analysis provides a reasonable estimate of emissions that would occur if the proposed Project proceeds and is not dependent on any other future projects the BLM or the State of Montana may choose to authorize.

Direct Emissions–- Construction Activities (including Drilling)

Construction-related criteria air pollutant and HAP emissions associated with the following elements would occur from the following sources: access roads, well pads (construction and drilling activities), bulklines, flowlines, pump stations and offices. Each construction group has a combination of the above elements in various quantities. An outline of each expected construction element per group can be found in Appendix E of this EA. Air emissions from the construction of the Project would occur due to 1) vehicular emissions from increased traffic from the construction work force and construction deliveries, 2) internal combustion engine emissions from construction equipment, and 3) fugitive dust (PM_{10} and $PM_{2.5}$) emissions from excavating, site preparation, and storage piles. For the most conservative estimation of annual direct emissions, it was assumed that construction and drilling activities for each group would be completed within one calendar year. Because the construction schedule is not finalized, the emissions from each group are presented on a tons per group basis rather than the year that activities would occur. A summary of each construction group's emissions of criteria air pollutants and HAP emissions are included in Table 3-3.

Table 3-3
Criteria Air Pollutants and HAP Emissions from Construction Activities
(Controlled U.S. Short Tons Total Per ROW Group)

ROW Group	CO	NO_X	PM_{10}[a]	$PM_{2.5}$[a]	SO_2	VOC	HAPS	20-Year GWP CO_2e	100-Year GWP CO_2e
Group 1	0.71	0.45	10.65	2.27	0.01	0.05	0.01	345	345
Group 2	2.65	1.20	22.99	4.66	0.02	0.17	0.03	1036	1035
Group 3	1.11	0.68	6.31	1.47	0.01	0.08	0.01	502	501
Group 4	1.26	0.71	11.49	2.34	0.01	0.09	0.01	519	518
Group 5	2.63	1.24	35.69	7.57	0.02	0.18	0.03	1172	1170
Group 6	0.83	0.55	6.00	1.12	0.01	0.06	0.01	321	320
Group 7	0.94	0.61	7.92	1.50	0.01	0.07	0.07	391	390
Group 8	1.09	0.65	9.99	2.19	0.01	0.08	0.01	456	455
Construction Total[b]	**11.22**	**6.08**	**111.05**	**23.11**	**0.09**	**0.80**	**0.19**	**4,743**	**4,734**

[a] Fugitive dust emissions have been assumed to be controlled via reduction measures and mitigation.
[b] Construction Total represents a lifetime sum of construction and drilling emissions in U.S. short tons. The construction schedule has not been finalized but these emissions would occur over a span of multiple years.

Generally, construction emissions are temporary in nature, fall off rapidly with distance from the construction activity, and would not result in long-term impacts. Once construction activities are complete, emissions from equipment would cease. Although construction emissions from the proposed Project are projected to last several years, the location of construction activities within the Project area would change with each group often by multiple miles.

Indirect Emissions–- Operational and Monitoring Activities

Air emissions from the operation of the Project would occur due to vehicular emissions from increased traffic from the work force and required deliveries; fugitive emissions from the operation of the bulklines and flowlines; and operational and maintenance activities related to the pump stations and wellheads. Operational emissions were quantified for multiple components of the Project: pipeline, pump station, and wellheads operation and maintenance, as well as a monitoring period. The pipeline and pump station operation scenario is representative of the time sequestration begins until the closure of the final well pads approximately 27 years later. The monitoring scenario represents the 50-year post-abandonment monitoring period. The emissions from each operational scenario are presented in Table 3-4. Criteria and HAP emissions associated with each operational scenario based on anticipated work force traffic and deliveries. Equipment that would operate for non-routine maintenance or emergencies is not included in this analysis.

Section 3.2.1 discusses the air quality and regulatory setting of the proposed Project. Total HAPs and each individual criteria pollutant are estimated to emit less than one ton per year primarily from mobile sources (automobiles). As such, minimal to no impacts to ambient air quality within Carter County or public health are expected as a result of operation of the proposed Project. GHG impacts are discussed further in the *Greenhouse Gas Emissions* section.

Table 3-4
Operational and Monitoring Emissions (U.S. Tons Per Year)

Component	CO	NO_X	PM_{10}	$PM_{2.5}$	SO_2	VOC	HAPS	CO_2e
Pipeline	0.56	0.07	0.02	0.02	4.42×10^{-03}	0.03	2.32×10^{-04}	117
Wellheads (each)	-	-	-	-	-	-	-	56
Pump Station (each)	-	-	-	-	-	-	-	17
Monitoring	0.49	0.03	0.01	0.01	3.86×10^{-03}	0.02	1.85×10^{-04}	15

Emission Reduction Measures

The proposed action construction and operations would include, among other options, implementation of the following measures to control emissions:

- installing temporary erosion and sediment control devices such as but not limited to silt fences, trench breakers, drainage channels or ditches, and tackifier for topsoil stockpiles;
- implementing dust abatement practices during construction and operation of the Project including but not limited to the application of non-chemical dust suppressants and imposing speed limits on access roads;
- construction equipment would be maintained in good working order to minimize trace gas emissions;
- drill rigs would meet EPA Tier 4 emissions standards; and
- meeting or exceeding applicable industry standards and regulatory requirements, including the 2015 MCFO RMP BMPs during construction, drilling, operation, and maintenance stages. Construction BMPs and mitigation are discussed in further detail in the POD.

Greenhouse Gas Emissions

The GHG emissions potentially resulting from construction of the proposed action along with subsequent operation of the injection wells and pipeline are presented in EA Appendix E and are summarized below in the cumulative effects discussion. Construction GHG emissions would occur from increased traffic from the construction work force, traffic from construction deliveries, and internal combustion engine emissions from construction equipment. Operational GHG emissions are expected to result from personnel commuting and fugitive CO_2 losses.

The pipeline, while operational, as well as the underground storage formation, were assumed to have fugitive CO_2 losses. The pipeline has an assumed leakage factor of 0.0014 Gigagrams per kilometer of pipeline (IPCC 2006). Estimated fugitive losses from the pipeline and equipment located at the pump stations are based on preliminary engineering estimates. Estimated losses from wellhead equipment are based on the methodology prescribed in 40 CFR Part 98 Subpart RR.

A leakage of CO_2 from the underground storage formation of 0.5% over a 100-year monitoring period was determined to be appropriate for the purposes of this analysis. Leakage rates ranging from no leakage to approximately 1% over 100 years have been cited in a variety of literature (Skone et al. 2013, Alcalde et al. 2018). As the estimates are intended to be representative of poorly monitored and abandoned legacy wells, Denbury averaged these two rates to present a very conservative estimate of fugitive CO_2 emissions that may occur during the monitoring period.

The GHG emissions were estimated by construction group and by operation scenario as defined in the *Air Quality* Section. The GHG emissions were then quantified as a CO_2e value. These emissions estimates are shown in Table 3-5 and Table 3-6.

Table 3-5
Greenhouse Gas Emissions from Construction Activities (U.S. Tons per group)

Construction Group	CO_2	CH_4	N_2O	20-Year GWP CO_2e	100-Year GWP CO_2e
Group 1	343	$7.53x10^{-03}$	$5.37x10^{-03}$	345	345
Group 2	1,031	$3.29x10^{-02}$	$1.07x10^{-02}$	1,036	1,035
Group 3	498	$2.18x10^{-02}$	$6.51x10^{-03}$	502	501
Group 4	516	$2.26x10^{-02}$	$6.78x10^{-03}$	519	518
Group 5	1,166	$3.43x10^{-02}$	$1.19x10^{-02}$	1,172	1,170
Group 6	318	$1.86x10^{-02}$	$5.37x10^{-03}$	321	320
Group 7	388	$2.08x10^{-02}$	$5.81x10^{-03}$	391	390
Group 8	453	$2.09x10^{-02}$	$6.31x10^{-03}$	456	455
Construction Total[a]	**4,712**	**0.18**	**0.06**	**4,743**	**4,734**

[a] Numbers may not add up due to independent rounding.

Table 3-6
Greenhouse Gas Emissions from Operational and Monitoring Activities (U.S. Tons Annual)

Component	CO_2	CH_4	N_2O	20-Year GWP CO_2e	100-Year GWP CO_2e
Pipeline	117	5.60x10-03	7.70x10-04	117	117
Pump Station (each)	17	-	-	17	17
Wellheads (each)	56	-	-	56	56
Monitoring	15	2.43x10-03	6.76x10-04	15	15

The Project has net-negative emissions. The average state-wide CO_2e emissions for the most recent 5 years of data available (2017-2021) was determined to be 60,799,395 tons per year (EPA 2023b). The highest estimated annual Project CO_2e emissions (Construction Group 5 and Operational Emissions), are calculated to be 1,695 tons per year. This equates to 0.003% of the statewide CO_2e emissions. For reference, Table 3-7 summarizes the annual GHG emissions from the proposed Project's peak annual emissions, the state of Montana, and the United States, in million tons CO_2e per year based on 100-year GWPs (EPA 2023a). However, when including the subsequential 150 million tons of CO_2 proposed to be injected as a result of this Project would total GHG emissions would be net negative. GHG impacts are discussed further in the *Greenhouse Gas Emissions* section of cumulative actions.

Table 3-7
Greenhouse Gas Emission Scaled Comparisons (Million Tons CO_2e annually [rounded])

	CO_2	CH_4	N_2O	100-Year GWP[a] CO_2e
Project [b]	$1.69x10^{-03}$	$1.12x10^{-06}$	$3.35x10^{-06}$	$1.70x10^{-03}$
Montana [c]	35	16	12	61
United States [c]	5,734	914	467	7,235

[a] 2023 EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks.
[b] It should be noted that the Project's peak annual emissions account for construction emissions which are temporary in nature.
[c] Gross CO_2e emissions totals provided by EPA Greenhouse Gas Inventory Data exclude Land Use, Land-Use Change and Forestry effects and includes fluorinated gases which are excluded from the Project emission calculations.

Cumulative Effects

Air Quality

As discussed in Section 3.2.2, MCFO quantified future effects to air quality based on four potential future land use scenarios for the MCFO RMP area, which includes the proposed Project area, in the SEIS. The modeling from the most conservative emission scenario shows future air quality and public health impacts similar to present conditions. However, the analysis indicated that cumulative nitrogen deposition could exceed critical loads of nitrogen deposition at some federal and tribal Class I areas.

The proposed Project would likely have negligible impacts on these areas regardless of the future land use scenario, as the Project has inherently low emissions from construction and operation compared to land uses such as coal, oil, and gas development. Further, the closest Class I area is over 50 miles from the proposed Project, and mitigation strategies would be implemented to control emissions, as described in the POD.

Greenhouse Gas Emissions

An important aspect of the proposed action is that once the first injection well (Injection Well 03) becomes operational, the Project would inject CO_2 into underground geologic formations for permanent CO_2 sequestration. As shown in Table 3-5 and Table 3-6, CO_2 is the largest contributor to GHG emissions from the construction and operation of the proposed Project. The amount of CO_2 this project would permanently sequester would be much greater than the GHG emissions created by the construction and operation of the proposed Project when comparing on a CO_2e basis. Thus, the Project would have net-negative emissions. The Project emissions, amount of CO_2e sequestered, and net CO_2e are shown in Table 3-8. Note that values presented in this table are reliant upon the assumption that each construction group would be completed within one calendar year. The construction schedule is not finalized and therefore these numbers are considered a representative estimate.

Table 3-8
Net Greenhouse Gas Emissions (U.S. Tons CO2e Annually)

Project Year	CO_2e	CO_2e Sequestered	100-Year GWP[a] NET CO_2e	100-Year GWP Cumulative Net CO_2e
Year 1[b]	345	0	345	345
Year 2[c,d]	1,208	500,000	-498,792	-498,448

Project Year	CO_2e	CO_2e Sequestered	100-Year GWP[a] NET CO_2e	100-Year GWP Cumulative Net CO_2e
Year 3[e]	634	1,500,000	-1,499,366	-1,997,814
Year 4	932	2,500,000	-2,499,068	-4,496,882
Year 5	1,695	3,500,000	-3,498,305	-7,995,187
Year 6[f]	973	4,500,000	-4,499,027	-12,494,213
Year 7	391	5,500,000	-5,499,609	-17,993,822
Year 8[g]	456	6,500,000	-6,499,544	-24,493,367
Year 9[h]	973	7,500,000	-7,499,027	-31,992,394
Year 10	973	7,500,000	-7,499,027	-39,491,421
Year 11	973	7,500,000	-7,499,027	-46,990,448
Year 12	973	7,500,000	-7,499,027	-54,489,475
Year 13	973	7,500,000	-7,499,027	-61,988,502
Year 14	973	7,500,000	-7,499,027	-69,487,530
Year 15	973	7,500,000	-7,499,027	-76,986,557
Year 16	973	7,500,000	-7,499,027	-84,485,584
Year 17	973	7,500,000	-7,499,027	-91,984,611
Year 18	973	7,500,000	-7,499,027	-99,483,638
Year 19	973	7,500,000	-7,499,027	-106,982,665
Year 20	973	7,500,000	-7,499,027	-114,481,693
Year 21	973	7,500,000	-7,499,027	-121,980,720
Year 22[i]	917	7,000,000	-6,999,083	-128,979,803
Year 23	788	6,000,000	-5,999,212	-134,979,014
Year 24	693	5,000,000	-4,999,307	-139,978,321
Year 25	581	4,000,000	-3,999,419	-143,977,740
Year 26	469	3,000,000	-2,999,531	-146,977,271
Year 27	357	2,000,000	-1,999,643	-148,976,913
Year 28[j]	245	1,000,000	-999,755	-149,976,668
Monitoring (Annual)[k]	7,515	0	7,515	-149,969,153

[a] IPCC Sixth Assessment Report 100-year Global Warming Potential Values. 20-year GWP values are available in Appendix E

[b] Proposed Project start year. Group 1 construction emissions are the only emissions considered.

[c] Pipeline is assumed to become operational.

[d] The first wellhead (Injection Well 3) is assumed to become operational. Year 2 CO_2e is calculated as Group 2 construction emissions plus operational emissions from the pipeline and wellhead. The tons CO_2e sequestered is then subtracted to present a net value.

[e] Pump Station 1 assumed to become operational. Years 3-5 are calculated as the respective construction group plus operation emissions from the pipeline, (1) pump station, and wellheads.

[f] Pump Station 2 assumed to become operational. Years 6-8 are calculated as the respective construction group plus operational emissions from the pipeline, (2) pump stations, and wellheads.

[g] Year 8 is calculated as Construction Group 8 plus operational emission from the pipeline, (2) pump stations, and wellheads. This is the final year with construction emissions based on the assumption that Construction Groups 1-8 would each take a maximum of one year to complete.

[h] Years 9 through 28 show only expected operational emissions based on the pipeline, pump stations, and wellheads.

[i] Well 3 (the first operational well) decommissions. Years 23-28 would see a reduction in operational wells by a multiple of two for each additional year.

[j] Year 28 is the assumed last year of injection based on 150 million tons of CO_2 being sequestered in total.

[k] Mobile combustion emissions from vehicles would continue on an annual basis for 50 years past the closure of the final injection

well to meet EPA Class VI UIC permit requirements. The geologic pore space fugitive emissions are also represented in the monitoring emissions.

The proposed action is expected to sequester a total of 150 million tons of CO_2 throughout the Project lifespan (30 years). The above table shows an estimated amount of CO_2 sequestered on an annual basis from the Project start year until year 28. Note that this does not perfectly align with the proposed 30-year ROW due to the assumption that each construction group would be completed in one year and that the first well (Injection Well 03) would become active in year 2 of the Project lifespan. Including the first year of monitoring activities, year 29 in Table 3-8, which include pore space fugitive emissions and mobile emissions (vehicles), the 100-year cumulative net CO_2e stored by the Project is -149,969,153 U.S. tons. The deviation from the project design of 150 million tons accounts for emissions from construction and any fugitive losses related to the Project. Ultimately, 99.98% of the designed 150 million tons is expected to be permanently sequestered. Further information regarding estimated annual emissions and annual sequestration amounts is available in EA Appendix E. For additional context, Table 3-9 shows the GHG emissions from each Project component converted into an equivalent value of gasoline power vehicles driven for one year. The net CO_2 sequestered value is included for comparative purposes.

Table 3-9
Greenhouse Gas Equivalencies

Project Component	CO_2e Emissions (U.S. tons)	Greenhouse Gas Equivalency [# of gasoline-powered passenger vehicles driven for one year][a]
Direct Emissions (Cumulative)	4,734	955
Indirect Emissions (Operational Annual)	190	39
Indirect Emissions (Monitoring Annual)	7,515	1,515
Net CO_2 Sequestered (Cumulative)	-149,969,153	-30,246,752

[a] Calculated according to methodology prescribed by EPA's GHG Equivalencies Calculator (https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator#results)

3.4 Resource Issue 2 – Cultural Resources

3.4.1 Affected Environment

The physical-APE for the Project is approximately 110,100 acres and corresponds to the Project area. Within the physical-APE, previously conducted cultural resources inventories cover approximately 4,002 acres. Initial BLM MCFO modeling of the cultural environment to assess the potential of 93,153 acres of un-inventoried lands within the APE found that the Project APE has the potential to have 355 unrecorded sites. Further identification effort lead to the development of the Cultural Resource Surface Disturbance Classification geospatial dataset. The dataset and its initial truthing strategy can be relied upon as a primary base dataset for the proposed action and all types of future undertakings within the physical-APE. See Bender et al. (2023) for specifics to each category, truthing details, and data quality information.

Bender et al. (2023) also conducted and reported identification efforts central to the proposed action's infrastructure which included Tribal Cultural Surveyors from the Standing Rock Sioux Tribe (Standing Rock), Rosebud Sioux Tribe (Rosebud), and Crow Nation (Crow). This inventory consisted of 2,185 acres within the physical-APE. There were sixteen cultural sites identified, recorded, and 21 isolated finds documented within the Class III survey corridor. In addition to the infrastructure inventory 37 of 41 previously recorded cultural resources present in the physical-

APE were visited and either rerecorded or updated. There were also 151 new sites recorded including small- and large-scale historic BLM range improvement projects, a historic agricultural research facility, and a historic district. These were known historic aged resources within the physical-APE requiring recording.

The physical-APE also includes inventory, recording, and evaluation from Ferguson & McElroy (2022). The report covers 3,680 acres and includes locations with proposed infrastructure as well as general APE locations. The report also contributes 12 additional cultural sites to information of the physical-APE.

Overall, between the Bender et.al (2023) and the Ferguson & McElroy (2022) reports there are 218 sites within the physical-APE; all the sites were evaluated for their inclusion in the National Register of Historic Places (NRHP). BLM's review agreed with the recommendations in all cases except for three of the sites 24CT0025, 24CT0060, and 24CT0058. The Montana State Historic Preservation Office's (SHPO) review of the Project warranted that two additional sites remain unevaluated for the NRHP, 24CT0061 and 24CT1391. Of the remaining 213 sites, 192 are determined not eligible for the NRHP. The remaining 21 are determined eligible for the NRHP. The 21 eligible properties within the physical APE are listed in Table 3-10, as follows:

Table 3-10
Eligible Properties within the Physical Area of Potential Effects

Site Number	Site Number	Site Number
24CT1571	24CT1613	24CT1688
24CT1607	24CT1614	24CT1689
24CT1608	24CT1622	24CT1690
24CT1609	24CT1632	24CT1691
24CT1610	24CT1643	24CT1692
24CT1611	24CT1671	24CT1718
24CT1612	24CT1687	24CT1719

There was also an Audio-Visual-APE (AV-APE) defined for the Project that covers 114,181 acres; 19,007 acres are outside the Project area. The AV-APE is based on 5.5 Minutes-Of-Angle (MOA) from each of the proposed injection well locations and is based on the maximum height of the proposed structures.

The AV-APE was developed to determine if the Project and its proposed infrastructure would have a significant impact to the viewshed of the Chalk Buttes TCP. The results of the analysis indicated that the structures to be placed at the proposed well locations would be visible. They are within 1-MOA distance from the TCP. The location of the proposed structures would not be placed within the threshold of significance, 5.5-MOA, where a detailed visual impact analysis related to the TCP would be warranted.

3.4.2 Environmental Effects —No Action Alternative

Under the no action alternative, the proposed action would not proceed. Therefore, there would be no effects to historic properties from the proposed action.

Cumulative Effects

Under the no action alternative, the proposed action would not be constructed; therefore, no cumulative impacts cultural resources or historic properties would occur. Existing activities in the area (i.e., livestock grazing, dispersed recreation, prescribed burns, noxious weed management, and agriculture) are expected to continue.

1.0.1 Environmental Effects—Alternative 2 (Proposed Action)

The proposed infrastructure would impact 19 sites within the physical-APE; all but one are determined not eligible for the NRHP. The five unevaluated sites–- 24CT0025, 24CT0060, 24CT0058, 24CT0061, and 24CT1391- would not be impacted by the proposed infrastructure. There is one eligible property that would be impacted.

The one historic property that would be impacted is 24CT1718, Lone Tree Road; the site would be impacted along a 6.7-mile-long segment. The use that is proposed along these portions is a continuation of an existing cycle of ROW access and routine maintenance. There are no proposed changes to the alignment of the road. The portions of the Lone Tree Road that would be issued a ROW for the proposed action would not result in an adverse effect. These impacts and use of the road would not change the historical character of the road.

Specific details related to the impacts and findings of the physical-APE are found in cultural resources project number and analysis document MT-020-22-38C, Truesdale (2023). Specific details related to the impacts and finding of the physical-APE are found in cultural resources project number and analysis document MT-020-22-38B, Truesdale (2023). The findings of the physical-APE resulted in BLM's determination of no adverse effect to Historic Properties. The Project's AV-APE was also determined to have no adverse effect to the viewshed of the Chalk Buttes TCP. The distance beyond the 5.5-MOA and within the 1-MOA lends itself to the application of normal visual contrast considerations that are commonly applied and committed to and detailed in Denbury's POD. The SHPO concurred with the BLM's Determination of No Adverse Effect to historic properties for Alternative 2 (Proposed Action), Montana SHPO numbers: 20233102609 (Physical-APE), 2023092715 (AV-APE).

Cumulative Effects

Authorization of the proposed action would have no effect on Historic Properties; therefore, the Project would not contribute to cumulative effects to Historic Properties. There would be 18 cultural sites evaluated for and determined not eligible for the NRHP. An UDP is included in POD Appendix X to provide for unanticipated discoveries.

3.5 Resource Issue 3 – Socioeconomics

3.5.1 Affected Environment

This section describes the existing social and economic characteristics of Carter County, Montana, encompassing the proposed Project. In addition, even though the Project is proposed in Carter County, Fallon County is included in the analysis because it is anticipated to provide most of the workers and housing needed during Project construction and operations. Data for the State of Montana is provided for reference.

Population and Housing

The affected environment is considered all of Carter County and Fallon County, Montana, both described as picturesque and known for ranching and farming. Carter County covers an area of 3,341 square miles with a population density of 0.4 people per square mile and Fallon County covers as area of 1,621 square miles with a population density of 1.8 people per square mile (U.S. Census Bureau 2023). Table 3-11 presents the demographic composition of Carter and Fallon Counties in comparison to the State of Montana.

Most housing in the counties are clustered in small towns and cities (e.g., Ekalaka and Baker) along major roadways with isolated residences scattered across the counties. Table 3-12 summarizes the housing characteristics of each county.

Table 3-11
Demographic Profile of Carter and Fallon Counties, Montana

Area	Total Population (2022)[a,b]	Total Population (2020)[a,b]	Total Population (2010)[a]	% Minority (non-White) Population (2020)[a,b]	% Hispanic Population (2020)[a]	% Population Below Poverty Level (2020)[a]	Median Household Income (2022 dollars)[a]	% Population Unemployed (4th QTR 2023)
Carter County	1,382	1,415	1,160	3.9%	1.3%	13.1%	$46,486	1.8%
Fallon County	3,011	3,049	2,889	4.9%	2.0%	10.0%	$79,750	1.9%
State of Montana	1,122,867	1,084,197	989,415	14.9%	4.5%	12.1%	$72,980	2.3%

[a] Carter County, Montana, Fallon County, Montana, and State of Montana–- U.S. Census Bureau, 2010, 2020, 2022, and 2023; accessed January 2024.
[b] BLM Socioeconomic Profiles, Carter County, Montana and Fallon County, Montana; Headwaters Economics; December 11, 2023.

Table 3-12
Housing Characteristics of Carter and Fallon Counties, Montana

Area	Total Housing Units (2022[a])	Median Value Owner-Occupied Housing (2022[a])	Owner-Occupied (2022[a])	Renter Occupied (2022)	Total Vacant Housing Units (2022[b])	Homeowner Vacancy Rate % (2022)	Rental Vacancy Rate % (2021)
Carter County	823	$140,900	522 (63.5%)	195 (23.7%)	188 (22.9%)	0.5	2.5
Fallon County	1,572	$231,300	1,133 (72.1%)	Information Not Available	313 (19.9%)	1.6	16.5
State of Montana	529,152	$305,700	365,114 (69.0%)	144,458 (27.3%)	65,085 (12.3%)	0.7	4.8

[a] U.S. Census Bureau, 2022; accessed January 2024.
[b] BLM Socioeconomic Profiles for Carter County, Montana and Fallon County, Montana; Headwaters Economics; December 11, 2023.

Community Facilities and Public Services

The Carter County Sheriff's Office, volunteer fire department, and EMS serve the county from Ekalaka, the county seat of Carter County, approximately 12 miles north of the Project area. Fallon County is served by ambulance/EMS and the Fallon County Sheriff out of Baker, approximately 37 miles north of Ekalaka. The Ekalaka Municipal Airport in Carter County and the Baker Municipal Airport in Fallon County, both general aviation airports serving the surrounding areas, support emergency response, recreational and business travel, agricultural and economic support, and critical community access. The Dahl Memorial Healthcare hospital, Carter County Public Health, several places of worship, a library, and the Ekalaka Public Schools are all in Ekalaka. Additional fire support services are available from Plevna and Baker (Fallon County, Montana), Camp Crook, South Dakota, and Marmarth, North Dakota ranging from 21 to 52 miles away. The Fallon Medical Complex in Baker provides critical and emergency care and health and social services across Fallon, Carter, Wibaux, and Custer counties in Montana and Slope, Golden Valley, and Bowman counties in North Dakota. No community facilities or public services are within the Project area.

Economy and Employment

Within Carter County, 27.8% of the land is owned by the federal government with 65.4% of the land held in private ownership. The BLM controls 84.8% of the federally owned lands with the U.S. Forest Service controlling the remaining 15.2%. Approximately 0.4% of the land is owned by the state, county, city, or other public jurisdiction. The economy of Carter County revolves around farming and ranching along with service-related jobs (e.g., transportation/warehousing, health care, recreation, etc.). Non-service-related jobs (e.g., farming, mining, construction, and manufacturing) comprise approximately 45% of the total jobs (401 out of 892) in the county compared to 18% in the State. Service-related jobs (e.g., retail; transportation and warehousing; finance and insurance; arts, entertainment, and recreation; and accommodations [lodging/hotels] and food services comprise approximately 21% of the total jobs (186 out of 892) in the county compared to 68.5% in the State, with government jobs (federal, military and civil service, state, county, and local) comprising approximately 14% of the total jobs (127 out of 892) in the county compared to 13.5% in the State.[7]

Farming, ranching, and recreational uses (hunting) comprise most of the jobs in Carter County. Within the proposed ROWs for surface elements, there are 17 grazing allotments comprised of approximately 14,000 permitted BLM AUMs. Five hunting outfitters maintain special recreation permits on BLM lands within the Project area.

As noted in Table 3-11, the median household income in Carter County in 2022 was $46,486 compared to $72,980 in the State of Montana. In the fourth quarter of 2023, 1.8% of the county population was unemployed compared to 2.3% of the state's population.

Because workers to support construction and operation of the Project would also likely come from Fallon County, the following socioeconomic overview of Fallon County is provided. Within Fallon County 11.2% of the land is owned by the federal government (all federally owned land is controlled by the BLM), 7.0% of the land is owned by the state, city, or county, with 81.8% of the land held in private ownership. The economy of Fallon County revolves around farming/ranching, mining (specifically oil and gas resources), and construction along with service-related jobs (e.g., retail trade, transportation/warehousing, real estate, and health care/social services). Non-service-related jobs (e.g., farming/ranching, mining, construction, and manufacturing) comprise approximately 35% of the total jobs (810 out of 2,293) in the county compared to 18% in the State. Service-related jobs (e.g., retail trade, transportation/warehousing, real estate, healthcare/social assistance, etc.) comprise approximately 42.4% of the total jobs (973 out of 2,293) in the county compared to 68.5% in the State.[8]

As noted in Table 3-11, the median household income in Fallon County in 2022 was $79,750 compared to $72,980 in the State of Montana. In the fourth quarter of 2023, 1.9% of the county's population was unemployed compared to 2.3% of the state's population.

3.5.2 Environmental Effects —No Action Alternative

Under the no action alternative, the proposed action would not proceed. Land uses, employment, and economic conditions would likely continue following current trends with farming, ranching, and recreation as the primary economic and employment sectors in Carter County, with service-

[7] BLM Socioeconomic Profile, State of Montana; Headwaters Economics, March 31, 2023; and BLM Socioeconomic Profiles of Carter County, Montana and Fallon County, Montana; Headwaters Economics; December 11, 2023.

[8] BLM Socioeconomic Profile of Fallon County, Montana; Headwaters Economics; December 11, 2023.

related jobs also contributing to the economy of Fallon County. None of the long-term ROW rental fees or employment generated by the proposed action would occur. Grazing leases and hunting activities would continue without interruption.

Cumulative Effects

Under the no action alternative, the Project would not be constructed; therefore, the actions would not contribute to cumulative effects in the future.

3.5.3 Environmental Effects—Alternative 2 (Proposed Action)

Population and Housing

No substantial changes in the resident population or types and numbers of residential units within Carter or Fallon County are anticipated with construction and operation of the Project. The Project would be developed over a 20-year time period with development cycles occurring every 1-2 years. Table 3-13 summarizes the anticipated workforce needed for construction and operation of the Project. Denbury estimates that 25% of the employees hired for construction (annual full-time equivalents [FTE]s) would come from Carter and Fallon counties, with the remaining 75% of FTEs coming from outside of the counties. If workers that meet Project hiring requirements are unavailable in Carter and Fallon counties, Denbury would hire additional workers from outside of both counties.

Table 3-13
Project Workforce

Construction Group / Operation Phase	Worker Type	Work Duration[a]	Annual FTE[b]
Group 1	Engineering/Planning	18 months	4
	Well Pad Construction	5 months	35
	Well Drilling	5 months	20
Groups 2-8	Well Pad Construction	5 months each year for 8 years	35
	Well Drilling	5 months each year for 8 years	20
	Flowline Construction	5 months each year for 8 years	35
	Bulkline Construction	5 months in Year 2 and Year 5	35
	Facilities Construction	5 months in Year 2 and Year 5	35
	Electric Transmission Line Construction (by Southeastern Electric Cooperative)	5 months in Year 2	35
	Access Road Construction	5 months each year for 8 years	35
Group 9	Well Pad Construction	5 months	35
	Well Drilling	5 months	20
Injection Phase	Engineering/Planning	20 years	4
	O&M Staff	20 years	3
Post-Injection, Plugging, Monitoring, and Closeout Phase	Engineering/Planning	50 years	1
	O&M Staff	50 years	1

[a] Construction and well drilling activities would be limited to July 16 – November 30 in any given year to mitigate disturbance to grouse, migratory birds, raptors, and winter big game areas.
[b] Annual FTEs are estimated to include 25% local workers.

The influx of temporary workers during construction periods would result in increased demands for temporary housing, most likely in Ekalaka and Baker. Denbury anticipates that the non-resident temporary construction workers would occupy local hotels, motels, and RV camps, primarily in Ekalaka (approximately 12 miles to the north) and Baker (approximately 49 miles to the north). As noted in Table 3-13, the anticipated construction and well drilling duration for Construction Groups 1-9 is 5 months in any given year; therefore, construction workers would only require temporary housing for approximately 5 months for each construction group. As noted above, the Project would be developed and operated over a 20-year period and monitored over a 50-year-long period; therefore, the temporary housing need is expected to be discontinuous throughout the phased development and operation periods of the Project.

Table 3-13 shows that approximately seven permanent workers would be needed during the 20-year-long injection phase for engineering, planning, and O&M activities, and two permanent workers would be needed during the 50-year-long post-injection, plugging, monitoring and closeout phase. The existing housing supply in Ekalaka and Baker is anticipated to be sufficient to support local permanent worker housing. Based on the most recent rental vacancy rates published for Fallon and Carter counties, Fallon County (16.5%) had a higher vacancy rate than Carter County (2.5%), so more rental housing may be available in Fallon County. However, given the duration (20 and 50 years) of Project development and monitoring periods, housing trends may differ at the time that housing is needed. Permanent workers may also choose to purchase homes near the Project area rather than rent.

Construction would occur within the Project boundary. Based on the proposed development plan for the Project, the proximity of residences to the primary site features were assessed. The closest residence to Project components (e.g., planned roads, well pads) is approximately 1.8 miles away. No homes or businesses would be displaced by the Project.

Given the short duration of construction periods spread across the 20-year-long construction and injection stages, the impacts of the Project on population and employment would be temporary and minor.

Community Facilities and Public Services

The community facilities and public services that serve the Project area are within Ekalaka, approximately 12 miles north of the Project and Baker approximately 49 miles north of the Project. No community facilities would be directly affected or displaced by the Project. The temporary influx of construction workers during the timeframes noted in Table 3-13, may create minor and temporary increased demands on law enforcement, volunteer fire departments, and health care services; however, the anticipated size of the required construction workforce, temporary construction periods of 5 months during any given year for Construction Groups 1-9, the phased development and operation of the Project over 20-year-long period, and monitoring over a 50-year-long period should not overtax the capacity of existing emergency services. Construction workers are not anticipated to relocate school-aged children to the area during the brief timeframes that construction and drilling would be allowed between July 16 and November 30; therefore, the Project is not expected to result in an increase in enrollment at local schools.

An estimated 25 miles of existing developed roads (14 miles on BLM land), including Lone Tree Road, Ridge Road, and Hammond Road, would be used to access the Project. Approximately 27 miles of existing two-tracks (25 miles on BLM land) and 5 miles of new two-tracks (4 miles on BLM land) would be used to construct and operate the Project. Existing developed roads across BLM, State, and privately owned lands may require surface grading and the installation of new surface

aggregate to provide a safe roadway for truck and equipment travel, but no widening or realignment of the existing, developed roads would occur. An agreement with Carter County would be completed for county roads. Existing and proposed two-tracks would be maintained as two track roads, and weed-free mats would be used to facilitate access for construction equipment and drill rigs during wet conditions. One new, 0.25-mile long access road to the Pump Station North would be graded and surfaced with aggregate. Temporary erosion and sediment control devices would be installed and maintained during Project construction to prevent sediment-laden stormwater from leaving existing and new ROW. No aggregate or other materials containing detectable levels of erionite would be used to improve roads. No changes to emergency response times or changes in routes would be caused by road maintenance activities or road use during Project construction or operation. Bonding would be completed for surface disturbing activities throughout the life of the Project. No new road construction, repair, or maintenance would occur in Fallon County as part of the Project.

Denbury would obtain required authorizations for county road use and crossing permits from Carter County prior to Project construction. Denbury would coordinate with the county to maintain hard-surfaced roads in an operable condition to continue to allow access by the public and landowners during construction. A traffic plan would be implemented to address access during construction and reclamation. If any temporary closures or detours are required, they would only be used after authorization is obtained from the appropriate agency (BLM, Carter County, Montana Department of Transportation, etc.). Denbury would present alternate routes to residents, contractors, and emergency responders for review and approval prior to implementing them. Proper signage would be provided, and signage locations would be approved prior to making changes in traffic flow. Denbury would notify the appropriate agencies, emergency response personnel, operators, and contractors working onsite prior to initiating road closures, route detours, or the reopening of previously closed roads. In addition, Denbury would develop, implement, and adjust as appropriate, the Project's Emergency Response Plan that outlines coordination with emergency responders and law enforcement in the event of an incident, severe weather, or natural disaster.

Economy and Employment

The Project would provide economic contributions to Carter and Fallon counties and surrounding communities through increased expenditures on local goods and services during construction periods. As described in Table 3-13, between 4 and 35 construction employees would be hired during the staggered construction timeframes for the Project. Denbury estimates that approximately 25% of the construction workforce would be hired locally, contributing up to 8 short-term, temporary jobs for each construction group over the 20-year-long Project development timeline. Denbury also estimates that 7 permanent employees would be hired over the initial 20 years of Project operation, and 2 permanent employees over the remainder of the overall 50-year Project operating timeframe. The permanent positions may be filled by local appropriately skilled persons or through skilled hires from outside of the Project area.

The Project is a FLPMA ROW, which generates rentals and fees payable to the BLM that are deposited into the federal treasury. Additional economic contributions to the county level would result from the use of State lands with funds payable to the Montana School Trust Fund.

The proposed action would result in no changes to permitted AUMs to existing livestock grazing permits. Areas of temporary disturbance would be restored in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan, which meets or exceeds RMP requirements for vegetation. Denbury would seed disturbed areas with a BLM-recommended seed mix for grouped

ecological sites to mitigate wind and water erosion and would treat and monitor invasive/noxious weeds.

Construction of the proposed Project is projected to occur outside of the prime hunting season for the special recreation permits that the BLM has issued for the Project area, resulting in minimal disruption for the five hunting outfitters with special recreation permits within the Project area. Denbury would coordinate with BLM before implementing temporary road closures and/or implement detours that may affect recreationalists.

Cumulative Effects

No disproportionately high or adverse human health or environmental effects are generated from the Project. The generation of revenue and local jobs is often viewed as a contribution to a county with lower income levels.

3.6 Resource Issue 4 – Wildlife (Sage-Grouse and Sage-Grouse Habitat)

3.6.1 Affected Environment

This section describes the existing habitat in the Project area, details sage-grouse habitat requirements, provides current and historic lek information within and surrounding the Project area, and discusses factors that may contribute to population declines that have been documented in the region.

General Habitat Description

The predominant wildlife habitat types occurring within the Project area include grassland (53% of the Project area) and sagebrush shrubland (46%) (USGS 2021). Limited areas of riparian and wetland vegetation, conifer forest, and barren land account for about 1% of the Project area. These areas, scattered throughout the Project area, also provide wildlife habitat. Topographic relief varies from flat to rolling with occasional sections of steep terrain.

The Project area is mostly rangeland and is located within the Central Grassland ecoregion where native and non-native vegetation is mixed grass prairie with small percentages of shrubs and forbs. Some of the more dominant grass species in the Project area include western wheatgrass (*Pascopyrum smithii*), thickspike wheatgrass (*Elymus lanceolatus*), crested wheatgrass (*Agropyron cristatum*), green needlegrass (*Stipa viridula*), sandberg bluegrass (*Poa secunda*), alkali sacaton (*Sporobolus airoides*), prairie junegrass (*Koeleria macrantha*), threadleaf sedge (*Carex filifolia*), blue grama (*Bouteloua gracilis*), buffalograss (*Bouteloua dactyloides*), and Japanese brome (*Bromus japonicus*). Some of the more dominant forb species include American vetch (*Vicia americana*), common dandelion (*Taraxacum officinale*), common yarrow (*Achillea millefolium*), textile onion (*Allium textile*), prairie coneflower (*Ratibida columnifera*), purple coneflower (*Echinacea angustifolia*), and yellow sweetclover (*Melilotus officinalis*). The shrubland vegetation cover type is primarily composed of sagebrush shrubland communities. Common shrub species in this habitat type include Wyoming big sagebrush (*Artemisia tridentata*), silver sagebrush (*Artemisia cana*), fringed sagewort (*Artemisia frigida*), broom snakeweed (*Guiterrezia sarothrae*), prickly rose (*Rosa acicularis*), Rocky Mountain juniper (*Juniperus scopulorum*), and greasewood (*Sarcobatus vermiculatus*).

Agricultural lands surrounding the Project area are predominantly hay fields consisting of alfalfa (*Medicago sativa*) or a mixture of cultivated grass species (e.g., crested wheatgrass, intermediate wheatgrass [*Thinopyrum intermedium*], and tall wheatgrass [*Thinopyrum ponticum*]). Hay fields on

privately owned lands are harvested one or multiple times per year. Other common crops grown in the area include barley (*Hordeum vulgare*) and spring wheat (*Triticum aestivum*). Development of vegetation and soil for agriculture using clearing, tillage, and irrigation (among other practices including seeding, application of fertilizers, pesticides, and herbicides) results in long-term conversion of potential sage-grouse habitats to sustained human uses. The conversion of sagebrush to agriculture can influence the ability of sagebrush-dominated landscapes to support sage-grouse through habitat loss and fragmentation; however, the agricultural lands surrounding the Project area are predominantly hay fields, which may provide foraging habitat during the spring and summer brood-rearing seasons.

In the summer of 2019, the MCFO identified the invasive ventenata, or wiregrass, in the Project area. Ventenata replaces perennial grasses and forbs, has no use to livestock or wildlife, and is a threat to sage-grouse habitat. During field surveys in the summer of 2022 and 2023, approximately 120 acres of noxious weeds were mapped within the proposed ROWs, as presented in the Noxious Weed Management Plan in POD Appendix J. In addition to the populations mapped within the proposed ROWs, the BLM identified several areas of previously recorded ventenata infestations outside of the proposed disturbance footprint but inside the Project area. The extents of infestations likely exceed the acres that have been mapped. Denbury treated approximately 800 acres, 1,200 acres, and 1,145 acres of ventenata in 2022, 2023, and 2024, respectively, which included acres within the proposed disturbance footprint and within the overall Project area. Denbury would continue to coordinate with the BLM to map and treat infestations annually in compliance with a BLM-approved Pesticide Use Permit.

Stagnant, shallow, surface water features are prominent throughout the Project area, which create potential habitat for mosquitos that may be infected with West Nile virus (WNV). The area has a deep water table, making traditional water wells uneconomic. Instead, flow through pits and water retention pits are and have historically been used to provide water for livestock. These pits have a 10-to-15-year life span until they are silted-in and no longer functional to livestock or wildlife. The area also contains numerous old spreader dikes, a commonly used method of irrigation that collects and stores runoff. These spreader dikes are no longer functional but still pool water for long periods of time. Mosquito larvae are dependent on water during their egg, larva, and pupa stages. Even a small amount of pooled water can attract female mosquitos.

Soils in the area also play a role in creating potential habitat for mosquitos infected with WNV. Saturated hydraulic conductivity (Ksat) is the ease with which a saturated soil can transmit water through the pore space and is based on physical soil properties. Over 94% of the soils within the Project area have a Ksat permeability of less than 0.2 inch of moisture per hour, while over 58% have a Ksat of less than 0.1 inch per hour. Percolation occurs slowly in these soils. It would take 5 hours for 1 inch of rain to percolate into soils with a Ksat of 0.2 and 10 hours for 1 inch of rain to percolate into soils with a Ksat of 0.1. Precipitation events with rainfall amounts exceeding the Ksat value would result in standing water on the surface, subsequently increasing potential for mosquito habitat.

Soils in the Project area are also prone to standing water when the interstitial pore space between soil particles becomes clogged with finer sediments. Sodium Adsorption Ratio (SAR) is a measure of the amount of sodium relative to calcium and magnesium in water extract from saturated soil paste. Soils that have SAR values of 13 or more may be characterized by an increased dispersion (i.e., movement) of clay particles. Almost 20% of the soils within the proposed Project area have an SAR ratio of 13 or greater. In soils with an SAR ratio greater than or equal to 13, percolation essentially ceases once clay particles fill the soil pore spaces, resulting in standing water. The standing water

can remain on the surface for days to weeks at a time, depending on total amount of precipitation, additional moisture, and evaporation. The inundated areas provide suitable habitat and timeframes for mosquito eggs to hatch and mature into adult mosquitos. Additional discussion on how WNV affects sage-grouse is provided below.

Sage-Grouse Habitat Description

Sage-grouse is a sagebrush-obligate species that requires continuous sagebrush-dominated habitats. Sage-grouse also forage in riparian, wet meadow, and hay fields during the spring and summer nesting and brood-rearing seasons and are dependent on mature sagebrush stands for forage and shelter in winter. Occupied habitat in Montana includes the sagebrush steppe of western North America, and sage-grouse distribution closely follows that of sagebrush, primarily big sagebrush (Montana Sage Grouse Work Group 2005). In addition to mature sagebrush, sage-grouse require an understory of grasses and forbs. In eastern Montana, where close interspersion of wintering, nesting, breeding, and brood-rearing habitats exist, sage-grouse are essentially nonmigratory (BLM 2015).

The entire Project area is designated as a PHMA for greater sage-grouse by the 2015 MCFO approved RMP. PHMA is defined as lands that have the highest value for sustaining sage-grouse populations. The State of Montana designated the area as Core Habitat which is defined as Montana's highest densities of sage-grouse (25% quartile), based on male counts and/or sage-grouse lek complexes and associated habitat important to sage-grouse distribution.

MTFWP conducted aerial telemetry flights to locate radio-collared hens from October to March 2010 to 2012 and delineated winter-use areas using data supplemented with the MTFWP sage-grouse winter database. Areas were designated into three categories: Critical winter range, Important winter range, and General winter range. Critical winter range consisted of large, wintered flocks (≥50) of sage-grouse where hens often were localized for the entire winter. The proposed Project area contains 30,176 acres of what the MTFWP report designated as Critical winter range for sage-grouse. Injection Wells 01, 02, 03, 05, 10, and 11, the Pump Station South, and 24.7 miles of roads (3.53 miles of new roads) would be located within these areas. Important winter range consisted of medium wintered flocks (<50) that were used for most of the winter. The proposed Project area contains 7,366 acres of this habitat designation. General winter range consisted of small flock sizes (<20). These areas are either minor wintering grounds or require more data to characterize their importance. The proposed Project area consists of 956 acres of General winter range (Foster et al. 2014). No wells, pumps stations, or roads would be in Important or General winter range.

The DDCT is a tool that the Program uses to estimate the percent of disturbance in sage-grouse habitat, relative to sage-grouse leks, that exists within an area larger than the proposed Project area. It models the density of development and level of disturbance that would result if a project were implemented in the DDCT area, based on the area associated with GRSG leks within 4 miles of the Project. The DDCT analysis area of 286,470 acres, larger than the Project area (110,100 acres), resulted in 9.52% existing disturbance, primarily from agricultural land disturbance on privately owned lands (9.29% disturbance from agriculture alone). When agricultural land is excluded from the DDCT, existing disturbance would be 0.23% of the available sage-grouse habitat within the DDCT area. The DDCT results related to the proposed action are discussed in Section 3.5.3.

The Program also developed a GIS-based habitat quantification tool (HQT) that consists of a three-level assessment to quantify the loss or gain of habitat function over the life of development and

conservation projects. The existing habitat conditions are first assessed using the Montana HQT Basemap, which accounts for existing anthropogenic surface disturbances such as roads, ROWs, and cultivated areas. Habitat function is then computed using population and habitat variables such as lek density; spatial distribution; breeding density; and sagebrush abundance, cover, and height class. Direct and indirect habitat impacts that would result from a development project are then assessed, and the project debit is determined. For conservation projects, credits are created through preservation, restoration, enhancement, and/or permittee-responsible mitigation projects, and are based on the functional acres gained or preserved. This function-based approach, in which debits and mitigation credits relate directly to the quality of the affected habitat function, standardizes the accounting of habitat gains and losses. Compensatory mitigation for habitat loss is not based solely on the affected acreage, but the quality of the affected habitat. Additional information about the HQT is published in the *Montana Mitigation System Habitat Quantification Tool Technical Manual for Greater Sage-Grouse* available at https://sagegrouse.mt.gov/documents/HabitatQuantificationToolTechnicalManualv1.1.

The Program publishes annual reports that summarize the annual activities, outcomes, and performance metrics of Montana's efforts to balance development and conservation in sage-grouse habitats, including project consultations, habitat impacts, mitigation measures, conservation credit generation, and stewardship fund management. The reports also synthesize key metrics for conservation projects that have been implemented from Program inception. The 2024 Annual Report shows six conservation projects (five conservation easements and one restoration project) that have been implemented in Carter County between 2018 and December 31, 2024 (Montana Sage Grouse Habitat Conservation Program 2025). These projects include Ringling Ranch, Ringling Ranch Ltd., LO Ranch, Lesh West Ranch, Lesh East Ranch, and Hammond Field.

For this Project, the Program completed an HQT analysis for the Project area and for three compensatory mitigation sites (LO Ranch, Ringling Ranch II, and Ringling Ranch III), all of which are in Carter County and discussed in detail below. As shown in the pre-project HQT basemap in Figure 6 in EA Appendix D, the proposed direct Project footprint is sited primarily in areas of low habitat quality due to minimizing impacts through the Project's co-location with existing roads and utility corridors (see also Section 2.2). However, the broader Project Assessment Area captures moderate and high quality sage-grouse habitat (see the "Operations Phase" panel in Figure 6 of Appendix D) that may be affected by the direct physical footprint. The habitat within the LO Ranch and Ringling Ranch site boundaries have a similar pattern, , predominantly moderate- to high-quality habitat with areas of low-quality habitat from conversion or infrastructure (Figures 7 and 8 in EA Appendix D, respectively). The HQT results are further discussed in Section 3.5.3 and in the Sage Grouse Mitigation Plan in POD Appendix I, which was approved by the Program on September 11, 2023.

Denbury has secured mitigation credits for the Project by implementing conservation easements at three mitigation sites in Carter County (LO Ranch, Ringling Ranch II, and Ringling Ranch III). The LO Ranch is within BLM designated PHMA, or state designated Core habitat, and the Ringling Ranch sites are within a BLM General Habitat Management Area, or state designated General habitat. There are 700,499.39 available credits from these three existing compensatory mitigation sites. As further discussed in Section 3.5.3, Denbury would apply mitigation credits from these three sites (LO Ranch, Ringling Ranch II and III) to offset the total debits attributed to the Project and policy multipliers.

Sage-Grouse Populations

Sage-grouse population declines are primarily due to habitat loss, habitat fragmentation, and reduced habitat quality resulting from energy development, urban expansion, conversion of habitats to agriculture, and alteration of habitats by invasive species that reduce habitat quality by reducing herbaceous forage and/or increasing the frequency and intensity of ground fires (United States Fish and Wildlife Service [USFWS] 2013). Other threats include predation, WNV, and fences.

Leks are open areas where strutting male grouse congregate to compete for mating opportunities. Sage-grouse leks are typically in the same location every year, with some leks persisting for over 85 years. Leks often occur in complexes, with one or more primary leks occurring near other lek locations that support fewer males (Connelly et al 2011). Some shifting of lek locations has been observed, potentially caused by persistent disturbance and/or alteration of vegetative cover (Connelly et al. 2011; Holloran 2005; Walker et al. 2007). It is surmised that the most important factor affecting a lek location is the proximity to and configuration and abundance of nesting habitat (Connelly et al. 2011; Connelly et al. 2000). Lek habitat is not considered limited to sage-grouse populations (Connelly et al. 2011) but is indicative of the location of high-quality nesting habitat and may change if the quality of that particular nesting habitat declines. It is thought that the most important factors for increasing sage-grouse populations are nest success, chick survival, and female survival (Taylor et al. 2012). Therefore, maintaining high-quality nesting and brood-rearing habitats is the more essential component of maintaining or increasing populations.

The USGS created a hierarchical monitoring model known as the Targeted Annual Warning System (TAWS) which monitors sage-grouse population trends across their range. All the leks in the Project area are part of the same neighborhood cluster (D-021), which are clusters of leks found in similar habitat with geographic barriers, or a local population. The cluster of sage-grouse leks found within the Project area have consistently shown a negative average annual population rate of change over six temporal scales (or timeframes). The most dramatic decline occurred on the short (2004-2022) and recent (2014-2022) timescale, with growth rates of 0.91 and 0.88, respectively (<1 indicates a decline, 1 stable, >1 increase) (Figure 9 in EA Appendix D). In the most recent temporal scale, this negative population growth contrasts with the surrounding clusters of sage-grouse which have had stable or increasing population growth rates of 0.97, 1.03, and 0.97. Unlike many other clusters showing this type of decline, there is not one leading cause that can be identified (Coates et al. 2023).

As discussed above and further described in Section 3.5.3, Denbury proposes to apply compensatory mitigation credits that have been secured through conservation easements at three locations in Carter County: the LO Ranch, Ringling Ranch II, and Ringling Ranch III. These ranches are part of different sage-grouse clusters or populations in the TAWS, which include south Carter County and northeast Wyoming. The population at the Ringling Ranch sites belongs to cluster D-005 which has seen population growth rates of 0.95 and 0.97, indicating declines at the short and recent temporal scales. The LO Ranch contains cluster D-008 which has seen population growth rates of 0.95 and 0.97, indicating declines at the short and recent temporal scale.

MTFWP and BLM conducted a population viability analysis for sage-grouse in what the state considers the Southeastern Montana Sage-Grouse Core Area, in the region the Project is located, using local population data. Several scenarios were modeled including various environmental conditions from normal conditions to severe weather events, flooding, and potential WNV outbreaks. The study found that the mean population growth rates in normal circumstances were

stable, and catastrophic, severe weather events did not substantially affect population growth rates (Foster et al. 2014). Lek survey data collected since the 1980's suggest that the downward trend of sage-grouse population occurring elsewhere are not occurring within the Southeastern Montana Sage-Grouse Core Area in Carter County. The study area included three USGS TAWS clusters, which, as discussed above, have not seen the same decline. However, the study was completed in 2012, and the most recent timescale analysis with the most significant decline occurred from 2014 to 2022 (Coates et al. 2023).

There are 17 Confirmed Active (CA) leks within the Project area and within a 3.1-mile buffer surrounding the Project. The MTFWP defines a CA lek as a lek with 2 or more males lekking on site in one year followed by evidence of lekking (e.g., presence of birds, or signs thereof such as vegetation trampling, feathers, or droppings) within 10 years of that observation. These 17 leks have been surveyed periodically since 1990, and at least 10 leks were visited in 10 years since 2005. As reported in Table 3-14, the average number of males observed during those surveys ranged from 1 to 21 males, which is similar to the averages from the MTFWP and BLM study discussed above.

Male attendance at these leks has been on a downward trend since the early 2000's reaching a record low in 2018 and then rebounding slightly. At a landscape-scale, sage-grouse population numbers generally oscillate over a period of 8 to 10 years (Fedy and Doherty 2011). The observed trend for the area is consistent with population fluctuations for the overall state of Montana (MTFWP 2022) (Figure 10 in EA Appendix D).

In addition to the 17 CA leks, there are 16 additional leks with other statuses. These include five Confirmed Inactive (CI) leks, five Unconfirmed (UC) leks, and six Never Confirmed Active (NCA) leks. UC and NCA leks are leks that do not have evidence that they are a permanent lek used on a yearly basis. In many cases these are satellite leks, relatively small leks (usually less than 15 males) near larger leks. These satellite leks can occur for several reasons including when the main lek is not suitable for a given day or days due to weather conditions, predators, disturbance, etc., and when the male count at the main lek is very high. Because there is not enough data to prove these are active leks, they were not included in this analysis, but they can help explain some of the fluctuations in sage-grouse numbers in the surveyed CA leks in Table 3-14.

Agricultural lands are considered one of the major threats to sage-grouse from habitat loss. While agriculture lands can provide some habitat during brood-rearing, they are generally avoided by sage-grouse. This is particularly true in the fall and winter when their diet consists nearly entirely of big sagebrush and due to the loss of shrub cover and rarely utilized for nesting. In central Montana, 96% of sage-grouse leks were located in a landscape where less than 15% consisted of agricultural lands. Each 10% increase led to a 54% decrease in lek density (Smith et al. 2018). Across the range of sage-grouse lek trends were higher for leks with no agriculture within two analyzed buffer distances, 5km and 18km, and declined as the amount of agriculture increased (Johnson et al 2011). It has also been found that the density of ravens (*Corvus corax*), birds that predate sage-grouse nests, is strongly positively correlated with agriculture (O'Neil et al. 2018). The Program's DDCT analysis showed that 9.29% (approximately 26,600 acres) of the Project's 286,470-acre DDCT area, are privately-owned, agricultural lands. Agricultural lands adjacent to the Project area are not all tilled, irrigated lands that remove all native vegetation; some are wild hay or dry-land haying of native vegetation which may be harvested yearly, and still other lands are used for livestock grazing.

WNV is a contributor to the declining sage-grouse populations throughout their range. WNV, a mosquito-borne arbovirus first found in the West Nile sub-region of Uganda in 1927. It is now found in 48 states after it was first detected in the United States in 1999. WNV can infect many species including over 250 bird species, and infected birds can transmit the virus (Cornell Wildlife

Health Lab n.d.). The first documented sage-grouse mortalities from WNV occurred in 2003 (Naugle et al 2004, Moynahan et al. 2006). As discussed in the *General Habitat* section above, the types of soils in the area and abundance of shallow water pits and spreader dikes provide mosquito larval habitat, increasing the potential for the spread of WNV. No testing of birds, mosquitos, or water sources have been completed for WNV in the area, but it is likely present.

While not documented in the Project area, WNV is likely a factor in the declining sage-grouse population in the Project area. In the six counties that border Carter County, the Center for Disease Control (2023) reported an uptake in human and equine cases in 2018, mostly in Campbell County, Wyoming southwest of Carter County (Table 3-15).

WNV was first found in sage-grouse in the Powder River Basin of Wyoming and Montana in 2003 and was estimated to cause a 25% decrease in survival (Naugle et al. 2004). These populations have only recently (2013 onward) started to show a stabilization in some of the population clusters, while other populations continue to show a continued negative decline (Coates et al. 2023). Current sage-grouse populations have lower counts than before the WNV outbreak, which is likely partially due to factors other than WNV.

On the fringe of the sage-grouse range in South Dakota, a 44% decline in numbers occurred from 2006 to 2008, and an overall 80% decline occurred from 2006 to 2014 (Robinson 2014). WNV was documented as a source of mortality for sage-grouse during this period although to what extent is not known (Kaczor et al. 2011, Swanson 2009). Sage-grouse chick mortality attributed to WNV ranged from 6.5 to 71% in 2006 and from 20.8 to 62.5% in 2007 (Kaczor et al. 2011). In the "non-outbreak" years of 2016 and 2017, it was found that 3.3 and 15%, respectively, of mosquito pools (vials) tested positive for WNV, and WNV only contributed to 5% of sage-grouse mortality (Parsons 2019). The South Dakota population has rebounded slightly since the record low counts in 2014 but still remains over 50% lower than prior to the 2006 outbreak (South Dakota Department of Game, Fish and Parks, Division of Wildlife 2022). WNV antibodies have been shown to last at least 5 months in sage-grouse (Walker et al. 2007). It is unknown if or how fast WNV antibodies decrease to undetectable levels in sage-grouse. In South Dakota less than 2% of the 158 sage-grouse tested had antibodies, suggesting that the population had not encountered WNV or that it was lethal to the population (Parsons 2019).

The most recent declines in sage-grouse may also be related to recent weather conditions. The winters of 2018 and 2019 saw much colder than average temperatures, particularly in the months of February through April, prior to and at the start of lekking season (Table 3-16). Out of the past six years, four years experienced colder than average annual temperatures at the Ridgeway weather station, located 1.3 miles east of the Project area (National Oceanic and Atmospheric Administration [NOAA] n.d.a).

It was previously believed that sage-grouse survival was only affected by severe winter weather conditions when sagebrush cover is reduced or eliminated. However, a study in Oregon found severe winters, defined as extreme low (5°F) temperatures over an 8-week period and accumulation of snow had a negative effect on survival rates during the winter of 1990/1991 (Anthony and Willis 2009). In northern Montana during the winter of 2003/2004, the sage-grouse mortality exceeded 30% two months after an extreme winter weather event. This event was defined as 4 feet of snow accumulation from December to February, most of which occurred over a two-day event in December, followed by two weeks of daily highs ranging from 26.6°F to -52.6°F (Moynahan et al. 2006).

The severe winter weather conditions of 2018 and 2019 were followed by a prolonged drought. Drought conditions began in May of 2020 when the US Drought Monitor (NOAA n.d.a) categorized the area as "abnormally dry" and upgraded it to "moderately dry" in June. The drought continued to worsen, and it was categorized as an "extreme drought" in July of 2021. Conditions improved to "severe" that winter, but the drought persisted until June 2022. Departure from normal precipitation at the Ridgeway weather station showed significantly less precipitation than average during 2020 and 2021 (Table 3-17). In addition to drought, 2021 also experienced another severe winter (NOAA n.d.a).

Table 3-14
Average Sage-Grouse Male Attendance at CA Leks[a]

MTFWP Lek ID	2005[b]	2009[b]	2010[b]	2011[b]	2014[b]	2015[b]	2016[b]	2017[b]	2018[b]	2019	2020[b]	2022	2023
CA-001	7	0	0	0	0	0	0	0	-	0	-	0	0
CA-005A[c]	38	0	0	0	0	0	10	0	0	0	0	0	0
CA-006	50	7	18	15	-	-	5	-	-	0	-	0	0
CA-009B	0	0	0	0	0	0	0	0	-	6	11	11	10
CA-055	45	26	0	-	8	0	21	3	-	0	-	5	2
CA-056	44	19	24	-	-	26	29	-	-	19	-	16	12
CA-057	10	5	10	-	2	14	1	-	-	3	-	1	0
CA-058	22	0	7	0	3	8	0	0	0	4	22	0	0
CA-059	5	0	0	0	-	0	6	-	-	0	-	14	7
CA-060	29	11	42	-	4	10	4	1	0	1	0	0	0
CA-061	4	0	1	4	17	-	0	-	-	1	-	16	8
CA-062	3	0	0	0	-	17	11	3	3	1	0	0	0
CA-066	24	0	0	0	-	3	-	-	2	0	9	3	0
CA-143	-	-	3	3	0	-	-	0	1	0	0	0	0
CA-148	-	-	-	2	4	-	1	0	0	0	0	0	0
CA-152	-	-	-	-	-	-	-	2	2	4	15	0	6
CA-154	-	-	-	-	-	-	-	11	3	0	0	0	0
Average Per Lek	**21**	**6**	**7**	**2**	**3**	**6**	**7**	**2**	**1**	**2**	**6**	**4**	**3**

[a] Only years where 10 or more leks were visited are included in this table.
[b] A dash ("-") indicates the lek was not visited during that year.
[c] Lek CA-005A was visited in 2006, 2007, 2008, 2012, 2013, and 2021.

Table 3-15
Reports of WNV in Carter County and Surrounding Counties using CDC (2023) Reports

County, State	2016[a]	2017[a]	2018[a]	2019[a]	2020	2021	2022	2023[a]	Incidence per 100,000 Population (1999-2022)
Carter, MT	0	0	0	0	0	0	0	1 (E)	unknown
Custer, MT	0	1 (M)	2 (H)	1 (H)	0	0	0	1 (E) < 5 (H)	3.19
Fallon, MT	0	0	0	0	0	0	0	0	7.11
Powder River, MT	0	0	1 (E)	0	0	0	0	1 (E)	2.4
Campbell, WY	1 (E)	1 (E)	1 (A) 4 (E)	1 (H)	0	0	0	1 (A) 1 (E)	2.24
Cook, WY	0	0	2 (H)	1 (H)	0	0	0	1 (E)	2.34
Hardin, SD	1 (M)	0	0	0	0	0	0	1 (Unk)	>1.10
Total	**2**	**2**	**10**	**3**	**0**	**0**	**0**	**<12**	**-**

[a] (E) indicates equine, (A) avian, (M) mosquito, (H) human, (Unk) unknown

Table 3-16
Temperature Departure from Normal by Month from 2017 to 2022 in Fahrenheit Using NOAA (n.d.a) Historical Data[a,b]

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2017	-8.1	4	4.7	1.7	0.7	2.6	4.9	-2.2	-1	-0.1	1.9	-1.4	0.6
2018	-2.4	-15.6	-7.1	-5	4.3	1	-0.2	-1.9	0.2	-3.1	-0.6	2	-2.3
2019	4.3	-18.1	-10.5	1.7	-5.4	-1	-1.9	-1.8	1.4	-7.1	-1.6	-3.1	-3.6
2020	-0.8	1.2	2.1	-3.6	-0.4	2.5	-0.3	1.8	-0.6	-4.8	4.3	7.2	0.7
2021	6.6	-11.8	4.9	-0.8	-1.6	8.2	6.3	*	*	*	5.9	2.4	-2.3
2022	2.8	-0.8	0.3	-6.6	-1.3	-1	2.1	3.1	4.5	1.7	-6.6	-7.3	-0.7

[a] Colors are based on degrees below normal (>10 = dark blue, 5 to 9.9 = medium blue, and 2 to 4.9= light blue)
[b] * indicates missing data.

Sage-grouse chicks require food with higher nutrients like forbs and insects. During periods of drought, forbs are often suppressed in growth and establishment (Loeser et al. 2007). Invertebrate communities are heavily dependent on the plant diversity and production within a given system and generally mirror the plant community during periods of drought by decreasing in abundance and diversity (Barnett and Facey 2016). Because of this, drought negatively effects chick survival. Females can partially offset the impacts of drought on chick survival by selecting nest sites in more preferrable areas but cannot completely mitigate it (Gibson et al. 2017).

Table 3-17
Precipitation Departure from Normal by Month from 2017 to 2022 in Inches using NOAA (n.d.a) Historical Data

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual[a]
2017	-0.09	-0.2	0.02	1.48	-1.49	-1.34	-1.1	-1.13	2.47	-1.21	-0.02	0.23	-2.38
2018	-0.23	0.92	0.48	0.16	-0.64	0.26	0.49	-0.28	-0.2	-0.31	-0.47	0.34	0.53

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual[a]
2019	0.16	0.42	0.39	-0.49	1.17	-0.29	3.11	0.86	2.82	0.56	0.28	-0.14	8.85
2020	-0.32	0.23	-0.27	-1.25	-0.36	-0.75	0.42	-1.32	-0.55	0.2	-0.57	-0.49	**-5.03**
2021	-0.28	-0.17	-0.38	-0.68	0.7	-1.93	-0.44	-0.13	-0.98	0.19	-0.44	-0.21	**-4.75**
2022	-0.26	0.16	-0.28	5.24	-0.73	0.45	-0.65	-0.29	-0.86	0.33	-0.07	1.01	4.05

[a] Highlighted cells indicate significant departure from normal annual precipitation.

Noise

Noise pollution has the potential to affect sage-grouse populations. Ambrose et al. (2021) conducted a study that evaluated the effects of gas-field sounds on sage-grouse. The study found a significant relationship between trends in grouse numbers and sound levels. The study also found that a common practice to limit anthropogenic sounds to no more than 10 dBA above the existing sound level is appropriate (Ambrose et al. 2021). The 10 dBA threshold is consistent with EO 12-2015, which states that new project noise levels, either individual or cumulative, should not exceed 10 dBA (as measured by $L_{50,}$ which is the sound pressure level exceeded 50% of the time) above baseline noise at the perimeter of an active lek from 6:00 p.m. to 8:00 a.m. during the breeding season (March 1 – July 15).

Existing sound levels for the area surrounding the proposed Project are not available; however, the National Park Service (NPS) conducted geospatial sound modeling based on long term measurement data and how it relates to climate, topography, human activity, and time of day/year. Using these relationships, NPS developed a model for expected L_{50} sound levels for all areas throughout the United States (Mennitt et al. 2014). The natural L_{50} sound level in the area is the expected sound level of the area without human influence. In absence of measured ambient data within the Project area, the NPS-predicted natural L_{50} sound level of 29 dBA is the assumed ambient noise level. This assumed sound level was used in the Project's noise analysis (POD Appendix V).

3.6.2 Environmental Effects —No Action Alternative

Under this alternative, ROWs would not be approved; therefore, no construction or reclamation activities would be conducted for the proposed action, and no new impacts to sage-grouse habitat would occur. As discussed in the *Affected Environment* section above, the sage-grouse population in the area is declining at a faster rate than their neighboring populations. While an exact cause is unknown, it is likely a combination of factors including drought, severe winter, WNV, invasive/noxious weed infestations, and the relatively high percentage of agriculture (DDCT calculation of 9.29%) surrounding the Project area. Under the no action alternative, these factors would continue to cause fluctuations and a general decline in the population. The Project area would continue to provide habitat to support sage-grouse during all seasonals; however, whether populations would stabilize or continue to decline and overall habitat quality would be dependent on restorations actions and collaboration by natural resource entities and stakeholders in the area along with extrinsic factors (e.g., fire and weather). Existing and established land uses would continue.

Cumulative Effects

No additional cumulative impacts from the proposed action would occur. Existing land management activities would continue, and the noxious weed monitoring and treatments that Denbury has initiated would cease. Noxious weeds could be treated through federal, state, or county efforts; however, treatment of the invasive ventenata and other invasive species that degrade sage-grouse habitat may not occur or would occur on a much smaller scale. Specifically, a lack of weed management on the aggressive infestation of ventenata within the Project area may lead to an increased prevalence of noxious weeds, leading to poor quality of sage-grouse habitat and potential displacement of sage-grouse.

Under the no-action alternative, because there would be no surface disturbing activities in the Project area, the compensatory mitigation secured by Denbury would not be applied to the Project. Since the conservation easements are already in place (versus a payment to the Program to be used for generating credits) they would then be available to offset other projects in GRSG habitat. These conservation easement lands are part of different sage-grouse clusters or populations in the TAWS but several are within the same PHMA. Therefore, the easements are not anticipated to provide use directly to the sage-grouse leks found in the Project area. However, because the five existing conservation easements implemented by the Program in Carter County are in perpetuity, they ensure new development on the enrolled private lands would not occur with opportunities to re-establish native vegetation, thereby reducing the risk of habitat fragmentation. At a landscape level, providing contiguous quality habitat for the sage-grouse population in southern Carter County and northeastern Wyoming is important to maintain connectivity and adequate habitat. Fragmentation and habitat conversion on other private lands in the area in the future is unknown. Furthermore, restoration at the Hammond Field site would likely increase habitat quality in the area. Any future surface disturbing or disruptive activities proposed on BLM lands adjacent to the conservation easements would be reviewed as a separate NEPA analysis in accordance with the 2015 MCFO RMP, as amended.

3.6.3 Environmental Effects—Alternative 2 (Proposed Action)

Under Alternative 2, the BLM would approve the SF-299 application and would issue Denbury short- and long-term ROW grants for elements listed in Table 2-1 to construct and operate the Project. Construction and reclamation activities would be conducted for the proposed action. Impacts to sage-grouse and habitat are analyzed below. The proposed powerline corridor is not a proposed ROW; therefore, it would not be approved as part of the proposed action but is being analyzed in this document.

Sage-Grouse Habitat Impacts

The BLM and the Project proponent coordinated with the Program to complete the sage-grouse habitat review process, outlined in the Montana EO 12-2015, using the Montana HQT to quantify habitat loss that would result from construction, operation, and reclamation of the Project using MTFWP and Project survey sage-grouse lek data. The model was calculated for an assumed 9-year construction phase (one year for construction of each of the 8 construction groups and one year for interim reclamation of the last injection well operational pads), a 20-year operational phase, and a default 75-year reclamation phase (the assumed timeframe for sagebrush to potentially reestablish). The Project area Raw HQT Score is 84,900.47 functional acres lost, which accounts for 2,984.37 functional acres of direct habitat impacts and 81,916.10 functional acres of indirect impacts. As detailed in the Sage Grouse Mitigation Approach in POD Appendix I, additional Program policy multipliers, including reserve account, federal net gain, DDCT 5% limit, and seasonal use multipliers for operational activities associated with aboveground facilities (i.e., injection wells and pump stations) were applied to establish an additional 304,224.59 debits that would require mitigation, for a total of 389,125.06 debits (see additional discussion on debits and credits below).

The baseline habitat services that exist prior to the proposed Project activities include considerable agricultural disturbances to the landscape. The DDCT was used to quantify the existing conditions and the net proposed difference as a result of the Project including co-location and phased construction and operations as detailed in POD. The DDCT analysis presents a net loss of 475.57 acres, or 0.16%, of suitable habitat within the 286,470.53 DDCT Area acres evaluated.

Existing disturbance within the DDCT Area (286,470.53 acres), with agricultural land included, is 9.52%. When agricultural land is excluded, because activity associated with these agricultural lands is minimal relative to other types of disturbance in the DDCT, 0.23% of the available suitable sage-grouse habitat within the DDCT Area (286,470.53 acres) is disturbed. The Project would increase the overall

disturbance by 0.16%, for a total overall disturbance of 9.68% with agricultural land included, or 0.39% without agriculture. The existing level of disturbance from agricultural land would result in sage-grouse continuing to avoid these lands for nesting, fall, and winter habitat; however, the lands may be used as foraging habitat. Moreover, the DDCT Area (286,470.53 acres) would continue to have reduced availability of quality habitat for sage-grouse because the agricultural land largely encircles the intact sage-brush steppe in the Project area.

In addition to the direct habitat impact, activity associated with the new disturbance has the potential to degrade sage-grouse habitat (e.g., leading to avoidance behaviors, subsidizing nest predators, etc.). Truck and equipment traffic will be increased during construction (and to a lesser extent during reclamation), both locally as wells are developed, and along access roads. Restricting construction periods to outside the breeding/nesting season will minimize impacts to breeding habitat during these phases of localized high activity. During the operational phase, expected traffic would be one visit per well per day. Most research on the effects of roads on sage-grouse focus on road density (higher density less likely to be used as habitat) rather than the level of activity. However, with fifteen total wells, the level of activity is expected to be a small increase over baseline traffic in the area (see also the *Sage-grouse Population Impacts* section below for additional discussion of activity and mitigation of road impacts).

Impacts to nesting, wintering, and brood-rearing habitats through construction activities and direct habitat loss of approximately 475 acres would be partially mitigated through the committed avoidance and minimization protection measures listed below. Large portions of the proposed action would occur along existing roads and ROWs, thus minimizing habitat fragmentation. Eighty-nine percent (35 miles) of the bulklines and flowlines would be co-located with existing or proposed permanent access roads. The Project would use approximately 14 miles of existing developed roads (Lone Tree Road and Ridge Road) and 25 miles of existing two-tracks on BLM-administered lands. Approximately 5 miles of new two-tracks (4 miles on BLM lands) would be created throughout the Project area to access well pads and pump stations. Where the proposed action would be constructed in new areas, temporary habitat impacts and degradation would occur. Reclamation activities would occur at the completion of construction and would minimize habitat impacts within the ROW over the longer term, but would result in a short-term increase in activity. Treatment of invasive and noxious weeds, specifically ventenata, in and around the ROW, would further ensure containment of weeds to facilitate maintaining quality sage-grouse habitat. Habitat conversion would occur in small portions scattered throughout shrubland areas, as reclamation would reclaim these areas to the grassland habitat type in the short-term, with shrublands expected in the long-term.

Only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would be graveled for the Project duration. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. In addition, by limiting most new routes to two-tracks, impacts to GRSG are minimized relative to more developed roads. After the 20-year CO_2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Therefore, the BLM does not anticipate that short or long-term disturbances from the Project would result in changes to land health standards or other vegetation resource objectives,

Sage-Grouse Population Impacts

The proposed location is in a ROW avoidance area (i.e., locating a ROW with surface disturbing or disruptive activities in GRSG PHMA is strongly discouraged) where development may only be allowed

with special stipulations/mitigation. The requirements for geological sequestration of CO_2 limit available sites (see Section 2.2), and location outside of GRSG HMAs is not feasible. Therefore, specific consideration of the ROW features is necessary to avoid impacts to GRSG, especially leks. The USGS completed a literature review to provide potential ranges for conservation buffers around sage-grouse leks for various activities/structures. A 3.1-mile buffer is recommended for surface disturbances (human activities that alter or remove natural vegetation), linear features (roads), and energy development (oil, gas, wind, and solar) to limit disturbance to seasonal movements and general habitat use, reduce habitat fragmentation, and deter increased predation (Manier et al. 2014). Thirteen leks would be within 3.1 miles of the proposed surface disturbance (pipelines), road use (new roads), and aboveground infrastructure (well huts) (Table 3-18).

Table 3-18
Distances (in miles) from a Lek to the Closest Structure/Activity Type

Lek ID	Existing Disturbance	New Permanent Surface Disruption (Roads, Wellpads)[a,b]	New Temporary Surface Disturbance (Bulklines, Flowlines)[a,b]	New Low Structure (Wells, Pump Stations)[a,b]	New Tall Structure (Transmission Line)[a]
Leks in the Northern Portion of the Project Area					
CA-001	2.3	**2.3**	3.2	2.3	6.9
CA-005A	5	**5.1**	14.4	5.1	20.7
CA-009B	3.1	**2.8**	**3**	2.8	6.2
CA-056	2.5	**2.5**	**2.5**	2.5	9.5
CA-057	4	**4**	4.9	4	8.3
CA-058	1.4	**2.1**	**2.1**	2.4	4.4
CA-060	1.5	**1.1**	**2.9**	1.5	4
CA-061	2.5	**2.5**	4.3	2.4	5.3
CA-062	1.6	**1.4**	4.8	1.4	2
CA-148	1.7	**1.1**	4.1	**1.1**	2.9
CA-152	1.3	**2.3**	6.7	**1.2**	2.8
Leks in the Southern Portion of the Project Area					
CA-006	1.3	**3**	9.2	**1.2**	14.1
CA-055	1.7	**1**	6.4	**0.9**	13.5
CA-059	2	**2.6**	**2.8**	2.7	8.9
CA-066	4	4	14.4	4	18.6
CA-143	4.6	4.6	13.7	4.6	20.1
CA-154	0.8	**0.8**	10.8	1.8	10.8

[a] USGS recommended conservation buffer for surface disruption = 3.1 mi., low structures = 1.2 mi., and new structures = 2.0 mi.
[b] Highlighted cells indicate Project elements within the USGS recommended conservation buffer.

Pipeline construction, regardless of a conservation buffer, would be temporary, co-located disturbance that would occur between July 16 to November 30 (outside of critical sage-grouse winter, breeding, and brood-rearing timing) and reclaimed in accordance with the POD. The co-location and reclamation using soil eco-sites developed seed-mixes that include sagebrush, forbs, and native grasses would minimize impacts to sage-grouse and habitat by avoiding lekking season, reducing fragmentation and establishing suitable habitat for sage-grouse.

The 3.5 miles of the new two-tracks would be in what MTFWP identified as Critical sage-grouse winter habitat, an area where sage-grouse congregate during severe winter weather. These new roads

spur off existing publicly accessible roads and end at wells or the southern pump station. Three miles of the new roads would be scattered throughout the 27,000 acres of the MTFWP Critical winter habitat. The construction, drilling, and reclamation of roads and wells would occur between July 16 and November 30, outside critical sage-grouse timeframes, and undergo all applicant-committed measures listed below and outlined in POD Appendix I to avoid or minimize impacts to sage-grouse population during these activities. The use of the roads in the winter for operational activities such as maintenance and monitoring of eight wells (01, 02, 03, 04, 05, 06, 07, and 11), could result in sage-grouse avoidance or disruption from the MTFWP Critical winter habitat areas, which may make individual sage-grouse vulnerable during severe winter weather conditions depending on the distance between the roads and the congregating site(s). However, restricting operational vehicle travel to these eight wells during severe winter conditions (defined in the *Mitigation and Conservation* section below) would further minimize potential impacts to the population from operational activities. The southern pump station is close to Ridge Road, a developed county road frequently used by the public and permitted users, where vehicle presence would be ongoing; thus, operational road use to the station is not anticipated to contribute to sage-grouse avoidance or additional disruption to sage-grouse population. Even though Denbury committed to operational vehicle travel restrictions (using roads only between 8 a.m. and 7 p.m.) during lekking season as part of their mitigation plan in PHMA, BLM is further restricting operational vehicle traffic to 10 a.m. to 6 p.m. during lekking season which would further reduce potential operational activities disruptions to the population. Both of these timing restrictions dramatically minimize potential impacts from operational vehicle traffic to all leks during lekking season and on days with severe winter weather conditions; therefore, road use for operational activities to these wells is not anticipated to contribute to population changes. Furthermore, these operation restrictions and limiting roads to two tracks greatly reduce impacts to seasonal habitats and, therefore, justify that allowing linear features within the buffer distances provide the same protection as outside the buffers.

There would be four wells within the 1.2-mile conservation buffer. Construction, drilling, and reclamation of wells would occur between July 16 and November 30, outside critical sage-grouse timeframes, and undergo all applicant-committed measures listed below and outlined in POD Appendix I to avoid or minimize impacts to sage-grouse population during these activities. During Project operations, the four well structures would provide opportunities as perches for raptors. There may also be behavioral changes due to sage-grouse avoiding structures in the landscape. Requiring anti-perch bird deterrents on all structures would further deter predation on the population associated with aboveground facilities although avoidance is still likely to occur. During operations, activity (i.e., well visits) would be minimal, limiting avoidance behaviors from increased human activity (see also HQT discussion).

To reduce the risk of predation on sage-grouse, the USGS recommends a lek conservation buffer of 2 miles for tall structures such as electrical, communication, and meteorological towers (Manier et al. 2014). Under Alternative 2, Denbury proposes a corridor for an aboveground powerline, a tall structure associated with the upgrade and extension of an existing distribution line to the northern pump station. The powerline would be submitted by Southeastern Electric under a separate ROW application to undergo a separate review and decision. For analysis purposes, this document analyzes the proposed corridor for the future aboveground powerline. One CA lek (Lek ID CA-062) would be located approximately 2 miles from the proposed power line extension corridor. The power line design, including pole placement, is not detailed; however, the POD states that 30-foot power poles would be installed to a depth of 6 feet, so the structures would be 24 feet tall. Adherence to the best practices listed in the *Avian Power Line Interaction Committee's Suggested Practices for Avian Protection on Power Lines* (Avian Power Line Interaction Committee 2006) and BLM-requested design features would be addressed in Southeastern Electric Cooperative's ROW application and review process.

Sage-grouse avoid structures that are correlated with higher avian predation such as power lines. The appearance of tall structures on the landscape regardless of actual use by raptors makes the surrounding habitat considered to be "risky" for sage-grouse and is therefore avoided (Dinkins et al. 2012). Wallestad and Schladweiler (1974) found 76% of seasonal movements for male sage-grouse occur within 0.6 miles of a lek, and 90% within 0.8 miles. Distances of nests from leks are more variable. In Wyoming, Holloran and Anderson (2005) found that 64% of nests occur within 3.1 miles of the lek. Even though the powerline is 2 miles from an active, lek, it is anticipated that sage-grouse would avoid the area around the power line during other seasonal uses such as nesting and winter due to the mere presence of a tall structure on the landscape.

However, if the powerline were buried, issues with habitat avoidance of vertical structures would be eliminated. A buried powerline would be a surface disruption, which could be mitigated with the same stipulations as other surface disturbances. After reclamation, there would be no anticipated impacts except when maintenance or repairs are needed. Moreover, similar timing stipulations applied to this Project, would be applicable to the future powerline, thus other than in an emergency, maintenance and repair would take place during restrictive timeframes for specific resources, including sage-grouse. In such cases, sage-grouse would temporarily avoid the area while workers are present but return to their normal behavior once the activities are complete.

Well Density

The response of sage-grouse to well density has been studied in the context of oil and gas wells. While the Project does not include oil and gas wells, studies of oil and gas well density and the response of sage-grouse is informative for analyzing well density for this project. Declining leks attendance is associated with a higher landscape-level density of well pads (Naugle 2011). At seven study sites in Wyoming, Harju et al. 2010 found a well density of 4 per 640 acres had a decline of 13 to 74% in lek attendance. A well density of 8 per 640 acres showed a decline of 77 to 79% in the Powder River Basin of Wyoming and Montana (Doherty 2008). The 2015 MCFO approved RMP incorporates a cap on the density of energy and mining facilities at an average of one facility (e.g., injection well) per 640 acres in PHMA. A well pad density analysis was completed within the DDCT Area. The well density calculation for the Project is 0.04 wells per 640 acres, which is considerably below the wells per acre density where impacts to GRSG leks have been observed and therefore is not expected to contribute to a decrease in the sage-grouse population. Furthermore, the distribution of injection wells across the project area limits the number (hence density) of wells near any individual lek, resulting in densities substantially lower than CBNG development where much lower well spacing is typical.

Noise

As noted in Section 3.5.1, Denbury conducted noise modeling of the pump stations, which are the facilities that would generate noise during Project operations. The analysis found that there would be no changes to the existing ambient sound levels at the closest leks. The distances from each pump station to the edge of the nearest sage-grouse lek buffer (the 0.6-mile No Surface Occupancy buffers) are 1.4 miles from Pump Station North and 3.0 miles from Pump Station South. Additional details about the noise modeling and methodology are provided in POD Appendix V. Figure 2 in EA Appendix D shows the modeled sound level contours surrounding each proposed pump station.

Mitigation and Conservation Measures

The Project would include construction and operation of aboveground facilities within a PHMA and would require operational activities to monitor and maintain the proposed infrastructure; therefore, not all impacts to the sage-grouse population or habitat can be avoided. However, the applicant-committed resource protections, as outlined in the POD, POD Appendix I, and summarized below,

would greatly minimize local and regional long-term impacts to sage-grouse habitat and leks by maintaining the functionality of lekking habitats and lek sites.

In addition to the applicant-committed resource protections, the BLM would require the following additional mitigation measures as stipulations to ROW grants, if approved, to further minimize disruption to sage-grouse population from operational activities:

- All motorized vehicle use is restricted for operational monitoring and maintenance activities for injection wells 01, 02, 03, 04, 05, 06, 07, and 11 and/or access roads leading to those wells when snow cover is four inches or greater, and/or there is a daily and/or overnight low temperature of zero degrees Fahrenheit (with wind chill) that occurs for three consecutive days or any three days in a five-day period. Restrictions would not apply to emergency situations.
- All motorized vehicle use for operational monitoring and maintenance activities for all wells and facilities on BLM lands is allowed only between 10:00 a.m. to 6:00 p.m. during the lekking and brood-rearing seasons (March 15 to July 15). Restrictions would not apply to emergency situations.
- Anti-perch bird deterrents must be installed at each injection well to reduce perch sites for potential sage-grouse predators. Commercially available perch deterrents allowed for use include spikes, bird slopes, and netting. Sound, laser, and electric bird deterrents would not be permitted.

Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and reclaim its habitat, as well as compensatory mitigation for residual impacts that cannot be mitigated. Design modifications were made to minimize impacts through Project siting, construction and operational phasing over multiple years, and the adherence to seasonal timing stipulations for sage-grouse during the construction, drilling, operations, and reclamation schedule (which minimizes impacts during sage-grouse lekking and nesting periods). Denbury minimized impacts by co-locating approximately 35.1 miles (89%) of the bulklines and flowlines along existing or proposed permanent access roads. Denbury designed and scheduled the construction activities for the Project to be consistent with Montana EO 12-2015 to the extent practicable. Denbury would utilize equipment best suited to the Project terrain to minimize disturbance and impacts to vegetation and soils. Denbury would also avoid operations in riparian areas, streams, and springs to the greatest extent possible to minimize impacts to aquatic resources. Denbury would avoid unnecessary surface disturbance created by movement of equipment on saturated or wet soils.

The Project would be developed in stages with the first group of activities involving construction of one stratigraphic test well, followed by a sequential build-out of 15 injection wells, associated infrastructure, and CO_2 injection over a 20-year period. By phasing construction, activity within sage-grouse habitat would be limited to the specific areas and timeframes associated with each stage of development. This approach localizes high levels of activity at any given time, allowing the majority of habitat areas to remain available for sage-grouse use and recovery between activity groups. As a result, impacts to sage-grouse and associated habitat of development activities would be minimized and confined to the locations and periods of each stage.

Denbury would conduct construction, drilling, routine maintenance, and reclamation activities, including vegetation clearing, only between July 16 and November 30 in any given year to minimize potential Project effects on nesting and habitats associated with sage-grouse (limiting the construction duration each year and staging construction over multiple years would substantially reduce disturbances). To limit the amount of new roads that would be created for the Project, existing two-

tracks and existing developed roads would be used to the extent practicable; however, some new two-tracks would be created.

Denbury would avoid contributing to the spread of WNV to sage-grouse and other bird species by implementing design features that would reduce the potential to create mosquito habitat in shallow standing water. During grading, Denbury would retain gaps between rows of topsoil and subsoil to prevent accumulation of water on the land. Temporary erosion controls would be installed to prevent sediment-laden water from being transported into wetlands and streams. Reserve pits would be fenced to prevent livestock and wildlife from trampling the perimeter, avoiding hoof print pockets of water that could serve as habitat for breeding mosquitos. Extending into the operations phase, Denbury would treat standing water in reserve pits with larvicides to reduce mosquito production.

Denbury would control invasive and noxious weeds throughout Project construction, operation, and reclamation phases, which would aid in the restoration of disturbed areas and protect adjacent undisturbed sage-grouse habitat. Noxious weed populations within the ROW, the Project disturbance footprints, and along access roads would be pre-treated. Noxious weed occurrences would be documented and monitored throughout all Project phases, and Denbury would continue to treat and eradicate noxious weed populations over the life of the Project. During construction, vehicles and equipment entering the site would be inspected to verify that they are free of soil and debris capable of transporting noxious weed seeds, roots, and rhizomes. Materials such as straw bales, mulch, matting, gravel, fill, and seed would be certified noxious weed-free before being used on the Project.

During the reclamation phase of the proposed Project, areas disturbed by construction would be reseeded. With the exception of permanent aboveground facility footprints, temporary disturbance areas would be reseeded with an approved seed mixture within the proper growing season to ensure appropriate vegetative cover/species and further reduce the establishment of noxious weeds. Denbury would use site-specific seed mixes for ecosites that have been identified for the Project. BLM-recommended seed mixes that facilitate the re-establishment of native vegetation and promote the succession of sagebrush establishment and recovery would be used. The seed mixes would include Wyoming big sagebrush, western wheatgrass, and other native grasses and forbs to enhance grouse habitat. Monitoring would be conducted in accordance with the methods described in Denbury's Reclamation, Mitigation, and Monitoring Plan.

Due to the Project's spatial and temporal committed measures that avoid and minimize impacts to sage-grouse, the Project area would continue to support the majority of existing habitat conditions necessary for sage-grouse survival and use. However, there are expected to be remaining impacts to habitat that would be offset by compensatory mitigation through the Program. The Project deviates from EO 12-2015 because it involves year-round operational activities and the Project's DDCT is above 5% (0.16% above the existing 9.52% disturbance measure). As disclosed above, existing impacts from agricultural lands would be ongoing. Additional disturbance leading to habitat loss and degradation (i.e., the additional DDCT amount of 0.16%) would be scattered throughout 286,470.56 acres of DDCT habitat area. This new disturbance and activity associated with this disturbance will create unavoidable impacts. In addition, the Program's deviation policy multipliers (i.e., reserve account multiplier, net gain, Core/PHMA area operational use during March 15- July 15) would be applied, consistent with EO 12-2015, to ensure adequate offsets for remaining impacts. The compensatory mitigation obligation measures would meet BLM state requirements to offset impacts to sage-grouse habitat by using perpetual conservation easements. Coordination with the Program and utilizing existing conservation easements ensures that compensatory mitigation is timely and effective throughout the life of the Project (see additional discussion of the DDCT, HQT, and offsets below in *Cumulative Effects*).

See additional information on compensatory mitigation as required by the Program at https://sagegrouse.mt.gov/.

Cumulative Effects

The Project area is publicly accessible, and existing land use activities are expected to continue. Consistent with state-wide trends, the sage-grouse population in this area has experienced fluctuations and an overall decline due to multiple, existing factors, which are expected to continue. While the Project would only contribute a 0.16% direct decrease in availability of sage-grouse habitat (i.e., additional disturbance footprint), it may add additional stressors to specific leks in the area by potentially modifying behavior and seasonal use. In addition, sage-grouse would also avoid short-structures during all seasonal use. If the aboveground power line is pursued, avoidance behavior would likely occur at a larger scale.

With the avoidance and minimization aspects of mitigation and other committed measures, the magnitude of these stressors from the proposed action would be of lower risk to be a primary contributor to population declines. This is due to the stressors being present but at an extended spatial and temporal scale, while being minimized as discussed above. More specifically, by limiting disruption or disturbance during lekking, winter, breeding, and brood-rearing seasons and potentially burying the future proposed power line, these stressors would drastically minimize avoidance by sage-grouse in the Project area. Impacts from unavoidable infrastructure and stressors, and the overall predicted status of sage-grouse habitat, is dependent on the application of conservation programs and management approaches in the broader landscape.

Denbury's committed mitigation and conservation measures minimize habitat impacts, but due to activity and disturbance over the life of the Project, impacts to GRSG remain. Utilizing the HQT approach setup by the Program under EO 12-2015, including the use of habitat deviation multipliers, the offset required to mitigate the remaining impacts is 389,125.06 debits. The conservation easements established at LO Ranch, Ringling Ranch II, and Ringling Ranch III will serve as the compensatory mitigation for the Project's impacts that remain following avoidance and minimization measures. The HQT was used to evaluate three compensatory mitigation sites associated with this project, which are all located in Carter County. These conservation easements, although outside the Project footprint, impose protective measures on private lands that would not otherwise be required. The mitigation credits secured by Denbury fully offset the total functional habitat debits attributed to the Project, and with the applied multipliers, are calculated to lead to an increase in functional acres available to GRSG. However, credits are primarily derived from GHMA, with the derivation of credits first from applying the credits from the two Ringling properties (about 362,000 credits), and then the remaining credits from the LO Ranch (approximately 26,000 credits). Therefore, the potential for the Project to not lead to declines in the population in core/PHMA is less likely from the proposed compensatory mitigation approach than from an approach where all of the credits are derived from easements within the core area (PHMA).

Sage-grouse habitat in the Carter County area is the target of conservation activities stemming from EO 12-2015, the Miles City RMP, and other associated initiatives. For example, the Program's 2024 annual report lists six projects in Carter County including Ringling Ranch, Ringling Ranch Ltd., LO Ranch, Lesh West Ranch, and Lesh East Ranch conservation easements, as well as the Hammond Field restoration project. These easements permanently restrict development on private lands, which helps reduce habitat fragmentation and preserve large, contiguous areas of moderate to high-quality sagebrush habitat. Although these easements are located outside the immediate Project area and serve different sage-grouse population clusters within the TAWS, they contribute to the broader conservation of sage-grouse in Carter County, Montana, and northeastern Wyoming by maintaining habitat connectivity and ecological function across the region. Furthermore, three of the easements for

GRSG are in PHMA/core (Lesh Ranch East and West and LO Ranch). However, the credits from conservation easements are available to offset impacts for future development/disturbance in GRSG habitat. Therefore, the easements efficacy in preventing population declines in core areas will be dependent on the actual location of projects requiring the use of these credits for offsetting remaining impacts. It is unknown if those future projects would be in GHMA or PHMA or their location relative to habitat values.

In conclusion, the combination of BLM operational measures, collocation of the majority of the Project in already disturbed areas, Project design features, and Denbury's committed temporal and spatial mitigation measures meet the sage-grouse conservation mitigation hierarch requirements of first avoiding and minimizing impacts to GRSG habitat. These efforts, Montana Governor's EO 12-2015 requirements, including the establishment of five (5) strategic conservation easements in nearby Carter County GHMA and PHMA, additional BLM and partner restoration efforts, collectively are anticipated to cumulatively increase available habitat or habitat quality for sage-grouse. Remaining impacts of this proposed project are compensated through conservation easements, leading to an increase in functional acres according the Program's HQT.

To meet GRSG objectives and management for this project the BLM must demonstrate three key elements are met: 1) locating a ROW in PHMA meets the avoidance criteria and buffer distances (see analysis above), 2) the Project leads to a net conservation gain, and 3) in an area exceeding the 5% disturbance cap that the exception criteria for this deviation is met (project not contributing to population declines in core/PHMA). On balance, GRSG are anticipated to have a net conservation gain in the broader landscape due to the cumulative restoration and management efforts of natural resource entities and stakeholders. While the primary disturbance leading to the Project area exceeding the 5% disturbance cap is agriculture (and primarily agricultural activities with lower associated activity levels), the loss of habitat makes additional anthropogenic disturbance more likely to impact populations. Therefore, in the HQT, compensatory mitigation calculation multipliers are used to offset the higher potential for GRSG population declines (i.e., an increase in credits required) and provide the additive conservation to minimize the risk of population declines. However, some uncertainty remains about population impacts within core areas as the location of the compensation sites, with most credits coming from GHMA, may offset population impacts overall in GRSG habitat but is less likely to offset population impacts in core areas. This leads to a higher risk that the proposed action will meet the exception criteria element of the DDCT 5% deviation.

3.7 Resource Issue 5 – Water Quality and Related Public Health

3.7.1 Affected Environment

Surface Waters

The proposed action is located within the Box Elder Watershed (Hydrologic Unit Code [HUC] 10110202) and the Lower Powder Watershed (HUC 10090209). Box Elder Creek generally flows south to north along, but outside of, the eastern Project area boundary. Within the Box Elder Watershed, USGS topographic maps show the following watercourses within the Project area: Buffalo Creek, Lone Tree Creek, and Dead Boy Creek in the northern portion of the Project area, Cabin Creek in the middle of the Project area, and Corral Creek in the southern portion of the Project area. These watercourses and their tributaries generally flow from west to east. The southwestern portion of the Project area includes Timber Creek and its tributaries, which generally flow southeast to northwest toward the Powder River, approximately 22 miles (43 river miles) west of the Project area. Figure 11 in Appendix D shows the HUC-8 watershed boundaries and USGS National Hydrography Dataset streams in the Project area.

Denbury completed a desktop review in 2022 to identify the probable locations of wetlands and waterbodies in the Project area, followed by an onsite wetland and waterbody delineation within approximately 730-acre study area. The study area encompassed the proposed surface ROWs and adjacent lands. The field delineation effort identified 15 wetlands within the study area, comprised of three wetland types (palustrine emergent, palustrine unconsolidated bottom, and palustrine aquatic bed). Several of the delineated wetlands were located within areas mapped as Dead Boy Creek and North Fork Dead Boy Creek on USGS topographic maps; however, at the time of survey, they were pockets of pooled water surrounded by berms or other landforms that disrupted water flow. They lacked a discernable ordinary high-water mark and defined bed and bank. Three additional streams were delineated within the study area; these streams include Boxelder Creek (perennial), an ephemeral tributary of Lome Creek, and an ephemeral tributary of Flat Creek. Delineation results are summarized in POD Section 5.4 and detailed in the Wetland Delineation Report in POD Appendix Q. None of the surface waters in the Project area were listed as impaired waters under Clean Water Act (CWA) Section 303(d), nor are any considered navigable waters under Rivers and Harbors Act Section 10.

Denbury conducted sampling and analysis of surface water samples in 2022 and 2023 following procedures in the Sampling and Analysis Plan that was developed for the Project. The sampling results become part of Denbury's baseline characterization program required under the UIC Class VI requirements codified at 40 CFR §146.82(a)(6). Nine surface water sampling locations were established; three locations were identified along Boxelder Creek, and six locations were identified on intermittent creeks that are tributaries to Boxelder Creek and the Powder River. Samples were taken if water was present and flowing during the sampling events and, in some instances, from pools within the streambed despite the absence of flow. During the September/October 2022 sampling event, there was no stream flow in any of the tributaries of Boxelder Creek and Powder River, so none of the tributaries could be sampled. There was also no flow in Boxelder Creek; however, water was present in isolated holes and pools, and samples were collected. In May 2023, samples were collected from all nine locations. Analytical results were compared to the Montana Circular DEQ-7 Montana Numeric Water Quality Standards, aquatic life standards, acute and chronic (MDEQ 2019); Montana Base Numeric Nutrient Standards and Nutrient Standards Variances (MDEQ 2013); EPA National Recommended Aquatic Life Criteria Table, fresh water acute and chronic (EPA 2022b); EPA NRWQC – Human Health Criteria Table, human health for the consumption of water plus organism and human health for the consumption of organism only (EPA 2022c); and Montana Stockwater Pipeline Manual Table 2.1 Use of Saline Water for Livestock (USDA NRCS 2004-2016). The results did not indicate unacceptable water quality for livestock consumption, and only trace levels of hydrocarbons or ammonia. The concentrations of total dissolved solids (TDS) and metals make the water less desirable for human consumption. Additional information is provided in POD Appendix S.

Groundwater

The Project area lies within the Northern Great Plains Regional Aquifer System (Davidson 1994). The system encompasses portions of Montana, North Dakota, South Dakota, and Wyoming. The aquifers present in the vicinity of the Project area are contained within approximately 8,300 feet of sedimentary deposits and are classified, in descending order, as:

- Unconsolidated-Deposit Aquifers
- Upper Cretaceous Aquifers
- Lower Cretaceous Aquifers
- Upper Paleozoic Aquifers
- Lower Paleozoic Aquifers

These aquifers are generally separated by regional confining units. The aquifers, except the Lower Paleozoic, are expected to have TDS concentrations generally less than 10,000 milligrams per liter (mg/L) within the Project area. Crystalline rocks that underlie the aquifer system yield little water and, at approximately 8,300 feet, are considered the base of the system (Whitehead 1996, Downey 1986). A description of each aquifer system is as follows:

The Unconsolidated-Deposit Aquifer System consists of Quaternary alluvium which is limited to the immediate vicinity of stream beds (NRIS 1997). Water for livestock is obtained from Quaternary alluvium aquifers at ranches within a mile of the Project area.

The Upper Cretaceous Aquifer System includes the Fox Hills and Hell Creek Formations. The Hell Creek Formation is only present in the extreme northwestern portion of the Project area. The Fox Hills Formation is limited to the northwestern portion of the Project area and along topographic ridges. These formations are commonly used as a water source outside the Project area.

The Lower Cretaceous Aquifer System includes the Inyan Kara Group and Muddy/Newcastle Formation. The primary water yielding units within this aquifer system are fluvial or deltaic sandstones (Whitehead 1996).

The Upper Paleozoic Aquifer System is the most widespread aquifer system in the Northern Great Plains, but contains little freshwater, except in areas of central and south-central Montana. The aquifer is primarily comprised of Mississippian and Devonian limestone (Whitehead 1996).

- The Pennsylvanian Minnelusa Group (comprised of the Broom Creek, Amsden, and Tyler Formations) is composed of marine sandstones and carbonates with shales in some sections.
- The Madison Limestone (equivalent to Charles Formation, Mission Canyon Limestone, and Lodgepole Limestone in Williston Basin) consists of marine carbonates, shales, and evaporites.

The Lower Paleozoic Aquifer System consists of sandstone and carbonates of the Big Horn Group, Winnipeg Group, and Deadwood Formation. These formations are deeply buried and contain saline water or brine, but may contain freshwater in uplifted recharge areas, including the Black Hills (Whitehead 1996).

There are no source water protection areas, municipal water sources, or sole source aquifers within the Project area. The Project area is used as rangeland for livestock, and stockwater is obtained from surface water or off-site wells drawing water from the Unconsolidated-Deposit Aquifer System, described above, or Upper Cretaceous Aquifer System.

The Montana Bureau of Mines and Geology Ground Water Information Center (GWIC) shows two domestic wells within the Project area and four domestic wells within 1 mile of the Project area (GWIC 2024). Denbury conducted a well reconnaissance in July 2022 to verify the location of each well and was unable to locate three of the six GWIC-mapped domestic wells. Two of the GWIC-mapped domestic wells were located on private property, where landowners did not authorize access for the study. Only one GWIC-mapped domestic well was observed as operational during the reconnaissance survey (See operational Well ID 98933 on Figure 12 in EA Appendix D). The well is located approximately 1 mile east of the Project area and 4 miles northeast of the closest injection well (Injection Well 04); it was included in the 2022 and 2023 sampling events. Coordination with adjacent landowners identified an additional domestic well within 1 mile of the Project area (See operational Well ID RSCZ‡ on Figure 12 in EA Appendix D). This well was located approximately 0.1 mile from the Project area and 2.4 miles southwest of the closest injection well (Injection Well 05); it was also included in the 2022 and 2023 sampling and analysis. Neither of the sampled domestic wells is within the Project area.

GWIC data show four stockwater wells within the Project area and five stockwater wells within 1 mile of the proposed Project area. Six GWIC stockwater wells were not found during the 2022 reconnaissance, one well was inaccessible due to lack of landowner permission, and two were operational (See operational Well IDs 98916 and 279937 on Figure 12 in EA Appendix D). Coordination with adjacent landowners identified two additional stockwater wells within 1 mile of the Project area (See operational Well IDs HNSN-A‡ and HNSN-B‡ on Figure 12 in EA Appendix D). The two GWIC-mapped stockwater wells and the two landowner-identified wells were included in the 2022 and 2023 sampling and analysis. None of the sampled stockwater wells are within the Project area.

In total, two accessible domestic wells and four accessible stockwater wells were sampled during the 2022 and 2023 sampling events. Figure 12 in EA Appendix D shows the locations of GWIC-mapped, landowner-identified, and sampled, operational water wells within one mile of the Project area. A description of the groundwater sampling methods and a summary of the results are provided in POD Section 5.5. POD Appendix S includes an inventory and analytic sampling results of all surface and subsurface water sources that were sampled within 1 mile of the Project area. The wells sampled draw water from Quaternary alluvium and the Fox Hills Formation.

The analytical results of groundwater samples did not indicate unacceptable water quality for livestock consumption, which is the primary use of groundwater within 1 mile of the Project area. USDA guidance describes the observed TDS concentrations in groundwater samples as satisfactory to very satisfactory for livestock. The concentrations of TDS and metals, as well as taste and odor concerns make the groundwater less desirable for human consumption.

3.7.2 Environmental Effects – No Action Alternative

Under the no action alternative, the proposed action would not proceed. Construction and operation of the surface ROWs and injection of CO_2 would not occur; therefore, there would be no changes or potential risk to surface or groundwater quality impacts and public health risks.

Cumulative Effects

Under the no action alternative, the Project would not be constructed; therefore, the actions would not contribute to cumulative effects in the future.

3.7.3 Environmental Effects – Alternative 2 (Proposed Action)

Surface Waters

Construction and operation of the surface ROWs (pipelines, well pads, pump stations, and roads) would result in direct impacts to approximately 0.2 acre of wetlands and no impacts to watercourses. Trenchless construction techniques (e.g., horizontal directional drilling) would be used to avoid surface impacts to waterways and wetlands. Where wetland impacts are unavoidable, Denbury would install temporary equipment mats to cross wetlands and would restore the temporarily impacted wetlands upon the completion of construction. These temporary wetland impacts account for approximately 0.1 acre of direct impact. Additionally, less than 0.1 acre of wetlands would be filled for well pad construction and operation or for installation of culverts or low water crossings along access roads. Four new culverts or low-water crossings would be installed to maintain surface water connections of streams and wetlands; the crossings would be designed in accordance with the BLM 9113 Roads Manual. Non-functioning, existing culverts along Denbury's proposed access routes would be repaired or replaced, as needed. A description and quantification of each proposed wetland is included in POD Section 5.4 and POD Appendix R.

The U.S. Army Corps of Engineers (USACE) regulates the placement of dredged and fill material in Waters of the United States (U.S.), including jurisdictional wetlands under the CWA Section 404 (33

U.S.C § 1344). BLM and Denbury have discussed potential Project impacts with USACE representatives who confirmed that anticipated wetland and stream impacts would likely be eligible for verification under a nationwide permit (NWP). Temporary and permanent impacts to Waters of the U.S. would also be subject to the general, state, and MDEQ Section 401 Water Quality Certification permit conditions for applicable USACE NWPs.

Surface disturbance activities also have the potential to result in indirect impacts to surface waters (including wetlands) as a result of erosion and sedimentation. Denbury's Reclamation, Mitigation, and Monitoring Plan includes procedures to control erosion and reduce the potential for sediment to be transported offsite or into wetlands or streams. Phased development would result in smaller, dispersed acres of disturbance at any given time, which would allow for expedited reclamation. In addition, the plan includes monitoring requirements and reporting to the BLM during reclamation efforts to ensure standards are met and that disturbances are promptly reclaimed. A third-party environmental inspector would be employed to provide oversight, monitor, and report on compliance with the ROW stipulations, permit conditions, and procedures and commitments outlined in the POD.

To minimize the potential of exposing surface waters to inadvertent spills of fluids used during construction, such as fuels, lubricants, and solvents, refueling, lubricating, and washing of construction equipment would be restricted to upland areas at least 500 feet away from waterbodies, streams, and wetlands located on federal lands. Application of committed measures such as equipment inspections, secondary containment structures, and utilization of spill kit readiness would be employed. Additionally, Denbury would prepare and implement a Project-specific Spill Prevention, Control, and Countermeasure (SPCC) Plan that addresses the handling of construction fuel and other materials. Section 6.1 of the POD details the spill prevention, containment, and response procedures that would be implemented to protect surface waters from accidental spills or leaks.

Groundwater

Construction activities associated with surface ROWs (pipelines, well pads, pump stations, and roads) that could affect groundwater include excavation and fuel handling. Potential impacts could include groundwater contamination and alteration of groundwater flow. Excavation would occur at depths that are shallower than the aquifers in the Project area, thus excavation is not expected to affect groundwater. Groundwater contamination could occur from an inadvertent spill of fuel or hazardous liquids during refueling or maintenance of construction equipment, or during operation of aboveground facilities. However, as described in the Surface Waters section above, Denbury would adhere to applicant committed measures, a Project-specific SPCC Plan, and would follow the spill prevention, containment, and response procedures that are outlined in Section 6.1 of the POD to protect surface waters from accidental spills or leaks.

Under the SDWA, the EPA is the authorized federal agency tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies. USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements[9]. EPA UIC regulations are designed to protect USDWs by preventing the movement of CO_2 and formation fluids out of injection formations and into USDWs. Under 40 CFR Part 146 Subpart H, the UIC program regulates all aspects of the injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites. EPA UIC Class VI regulations require CO_2 be injected only in aquifers with a higher level of salinity that prevents its use as a drinking water aquifer (a salinity level of greater than 10,000 mg/L total dissolved solids).

[9] https://www.epa.gov/uic/class-vi-wells-used-geologic-sequestration-carbon-dioxide

As part of the permit review process, the EPA requires "baseline geochemical data on subsurface formations, including all USDWs in the area of review" for Class VI UIC wells [40 CFR §146.82(a)(6)]. To obtain the required site-specific UIC Class VI information, a stratigraphic well is drilled, and the data used to complete regulatory analysis, including modeling, to determine uncertainties (e.g. determination that seismicity would not interfere with containment; location, orientation, and properties of known or suspected faults and fractures and a discussion supporting a determination that they would not interfere with containment, etc.) and ensure USDWs are protected. EPA would complete a comprehensive review of Denbury's UIC Class VI well permit applications (for well construction permits and authorizations to inject) using the most current, site-specific geologic data which would be obtained from the proposed stratigraphic well (Injection Well 03). The data would be used to complete required permit modeling to ensure compliance with UIC Class VI regulations and protection of USDWs.

Class VI injection well construction, testing, and operation requirements, outlined in 40 CFR §146.86-88, are designed to protect USDWs. Wells are constructed with multiple layers of corrosion resistant steel casing and cement, with at least one string of casing and cement that extends from the injection zone to the surface and surface casing and cement that extends through the base of the lowermost USDW to the surface (See POD Appendix D for a preliminary wellbore diagram). Materials must be compatible with fluids they may come into contact with and must meet or exceed American Petroleum Institute, American Society for Testing and Materials, or comparable standards approved by the EPA UIC Program Director. Before injection is approved, each well is subjected to a series of tests to demonstrate its internal and external mechanical integrity and to verify hydrogeologic characteristics of the injection zone. The injection pressure and rate are determined through the permitting process, are set in permit conditions, and are continuously monitored during well operations.

The issuance of ROW grant would not itself result in potential fluid leakage into a USDW. However, the Notice to Proceed applied by BLM on the ROW grants would ensure EPA review of potential fluid leakage and corrective action are in place with an approved UIC Class VI permit. If EPA approves a UIC Class VI well permit, it would be routinely monitored during the life of the Project in accordance with an EPA-approved T&M Plan and MRV Plan as discussed in POD Appendix A. Routine monitoring would include evaluation of elevated concentrations of indicator parameters in surface water, soil, gas, and ambient air samples. An Emergency and Remedial Response Plan, as required under 40 CFR §146.94(a) and approved by the EPA as part of the UIC permitting process, would be implemented to protect USDWs in the event that movement of the injection or formation fluid may endanger a USDW during construction, operation, and post-injection site care periods.

Because another agency has a statutory directive to review and approve UIC permits, the BLM does not have authority to apply EPA UIC Class VI regulations under the SDWA. The BLM does, however, require a ROW holder to obtain all necessary permits/approvals prior to undertaking an action. See POD Table 2-11 for a list of all permits/approvals required for the Project. The BLM ROW grant would include a Notice to Proceed[10] provision, requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO_2 injection, making the ROW grant and POD , contingent on the EPA UIC permit approval. This would ensure protection of USDWs through compliance with EPA issued permits and enforceable UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO_2 and formation fluids out of injection formations and into USDWs. If the EPA determines that a UIC permit does not meet regulatory requirements or is uncertain it meets requirements to protect USDWs, then approval of a UIC permit would not be appropriate and not be issued by EPA. Without an EPA UIC permit/approval, the holder

[10] Notice to Proceed is a written authorization by the BLM Authorized Officer that allows a ROW holder to initiate actions under a grant.

would not be allowed to use and operate the BLM lands and pore space in accordance with the ROW grant and may request to relinquish the grant.

Public Health

Pipeline ruptures could potentially affect water quality and related public health in the Project area. As described in EA Section 2.1.1 and POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. Valves would be installed at required spacings along the pipeline system to provide shut-off locations to mitigate a pipeline rupture, should it occur (See construction, operation, and maintenance requirements in 49 CFR §195.116, §195.258, §195.260, and §195.418-420). Additionally, Denbury would equip the flowlines and bulklines with a SCADA system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed.

Denbury would follow the requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulkline and procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements.

Additionally, Denbury would conduct hydrostatic testing of each proposed pipeline in accordance with 49 CFR Part 195 Subpart E before placing the pipelines in service. The pipelines would be tested at a minimum of 1.25 times the maximum operating pressure of the pipeline, which would be held for a minimum of 8 hours. The test would be accepted upon proof of no leakage. In the event of a break during testing, the break would be repaired, and the above test repeated until a satisfactory test is obtained on the section. Additional information is provided in the Hydrostatic Test Plan in POD Appendix L.

Migration of CO_2 or formation fluid to USDWs or the surface could affect water quality and public health. As described in the *Groundwater* section above, the EPA UIC Class VI regulations include testing and monitoring requirements to test the integrity of injection wells, monitor the CO_2 plume, and monitor groundwater above the confining zone. In the event that movement of the injection or formation fluid may endanger a USDW during construction, operation, and post-injection site care periods, Denbury would implement its Emergency Response Plan (POD Appendix W) and a site-specific Emergency and Remedial Response Plan that will be reviewed and approved by the EPA UIC Program Director as part of the Class VI UIC Permit application process (40 CFR §146.94). Following the EPA's UIC Program Class VI Well Project Plan Development Guidance, the Emergency and Remedial Response Plan would be revisited and revised, as needed, after the initial AoR modeling is completed, after each reevaluation of the AoR, and as needed throughout the life of the Project, including through the Post-Injection Site Care period. The EPA recommends that a variety of site-specific factors, including but not limited to the presence of communities and sensitive populations, should be considered in development of the Emergency and Remedial Response Plan.

As described in Denbury's Emergency Response Plan (POD Appendix W) and in POD Section 7.1, local response officials would be provided training on how to respond to Project-related emergencies,

and they would be invited to participate in annual table-top drills. Denbury would manage any incidents using a unified command structure in coordination with applicable federal, state, and local agencies following the National Incident Management System Incident Command System.

Under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR §146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR §146.85(a)(2)]. See EPA Class VI page for further information at https://www.epa.gov/uic/class-vi-wells-used-geologic-sequestration-carbon-dioxide.

BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. As noted in the *Groundwater* section above, the BLM ROW grant would include a Notice to Proceed provision, requiring Denbury to submit verification of EPA approved UIC permits before use of the lands or BLM pore space ROW for CO_2 injection, making the ROW use contingent on the EPA UIC permit approval. In accordance with 43 CFR §2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant, including the POD.

Cumulative Effects

The proposed action would have minimal to no impacts on surface waters (including wetlands). Approximately 0.1 acre of wetlands would be temporarily matted during Project construction, and these wetlands would be restored upon the completion of construction. Less than 0.1 acre of wetlands would be filled to construct well pads or to install culverts or low-water crossings under access roads. These impacts are expected to meet the conditions of a USACE NWP and general, state, and MDEQ Section 401 Water Quality Certification permit conditions. Applicant-committed measures including erosion and sediment controls; expedited restoration of the phased Project development; and adherence to spill prevention, containment, and response procedures would further mitigate surface water impacts. Therefore, cumulative impacts to surface waters and wetlands are not anticipated due to Project when combined with the ongoing activities in and around the area that may also affect water quality (livestock grazing, noxious weed control, dispersed recreation/hunting, existing ROWs, oil and gas development in adjacent counties, and agriculture on privately owned lands).

Based on the applicant-committed measures including adherence to spill prevention, containment, and response procedures, construction of the infrastructure associated with surface ROWs is unlikely to adversely affect groundwater. Therefore, cumulative impacts to groundwater associated with surface ROWs are not anticipated.

As described in the *Groundwater* section above, the EPA is the authorized federal agency tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies. USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements, which include well construction, testing, and operations requirements; continuous testing, monitoring, and reporting; preparedness for emergency response; and demonstration of financial assurances. By adhering to the UIC Class VI regulatory requirements and EPA permit conditions, CO_2 injection should not result in any impacts to groundwater quality. The Emergency and Remedial Response Plan and financial assurances provide contingencies for an unanticipated event, and implementation of these contingencies, if required, would mitigate potential groundwater impacts. Therefore, cumulative impacts to groundwater associated with CO_2 injection are not anticipated.

4 Consultation and Coordination

4.1 Summary of Public Involvement and Coordination

Prior to initiating public scoping, on April 4, 2022, through the BLM Montana/Dakota Facebook page, the BLM announced receipt of the ROW application, and its plans to obtain baseline data and conduct outreach to federal, state, local and tribal governments.

Scoping

On September 26, 2023, the proposed action was posted on the BLM ePlanning website[11] with NEPA number DOI-BLM-MT-C020-2023-0070-EA. A 30-day public scoping period was initiated on September 27, 2023, with the posting of the proposed action POD and associated maps to the BLM ePlanning website. Letters were mailed to stakeholders on September 25, 2023 to notify them of the scoping period and to seek comments on the proposed action. A post was published on September 27, 2023 on the BLM – Montana/Dakotas Facebook page announcing the scoping period and public meeting. On September 27, 2023, a newspaper article announcing the scoping period and public meeting was also sent to news outlets in Montana, North Dakota, South Dakota, and Wyoming. A public meeting was held in Ekalaka, Montana on October 12, 2023. On October 13, 2024, the BLM received a letter requesting the comment period be extended to allow further review of the scoping materials. On October 17, 2023, the BLM extended the public comment period an additional 30 days, announcing that the scoping period would end on November 27, 2023. On January 30, 2024, a scoping report was posted on the BLM ePlanning website.

Public Comment

The EA was posted on the BLM ePlanning website for a 30-day public comment period on February 16, 2024. Letters were mailed to stakeholders on February14, 2024 to notify them of the scoping period and to seek comments on the proposed action. A letter was mailed on February 15, 2024 to notify stakeholders of the correct public meeting location. A post was published on February 16, 2024 on the BLM – Montana/Dakotas Facebook page announcing the comment period and public meetings. Also on February 16, 2024, a newspaper article was sent to news outlets in Montana, North Dakota, South Dakota, and Wyoming. A public meeting was held in Ekalaka, Montana on March 5, 2024, and a virtual public meeting was held on March 6, 2024. On March 13, 2024 and April 17,2024, the BLM announced two separate 30-day comment period extensions in response to requests for additional time to review the EA. The 90-day public comment period ended on May 17, 2024.

The BLM received 138 submissions, which included one submission that contained 453 form letters. The majority of submissions were from individuals, followed by businesses and non-governmental organizations and state and federal agencies. Comments received and BLM responses are provided in EA Appendix F. Revisions that were made to the EA and POD to address public comments are identified in comment responses.

As part of the public comment review process, the BLM granted two separate extensions on the EA, (March 28, 2025 and July 31, 2025) to consider ongoing sage-grouse planning efforts and further coordination with the State of Montana and Denbury.

4.2 Summary of Interagency and Native American Tribe Coordination

This section summarizes coordination that the BLM MCFO has conducted with federal, state, and local government agencies, and Native American Tribes. In addition to the coordination described below,

[11] Available at https://eplanning.blm.gov/eplanning-ui/project/2026556/510

each agency and tribe received a letter on September 25, 2023, informing them of the 30-day public comment period for this EA and soliciting comments, and a follow up letter on October 17, 2023, notifying them of the 30-day comment period extension. Agencies and tribes also received a letter February 15, 2024, notifying them of the public comment period.

State Historic Preservation Office

The proposed action is considered a federal undertaking, as defined in Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations found in 36 CFR Part 800. The BLM's Cultural Resource Program in Montana operates under a National Programmatic Agreement with an implementing protocol with the Montana SHPO. The BLM coordinated with the Montana SHPO throughout 2022 and 2023 to develop cultural analysis approach and to facilitate consultation efforts for field surveys and visual setting. This included a field visit on September 12, 2022 to the project area. The BLM consulted with the Montana SHPO under provision Section VIII.8D of its state protocol on September 22, 2023. BLM received a response about its finding of effect on October 27, 2023.

Tribes

The BLM consults with Native Americans under various statutes, regulations, and EOs, including the American Indian Religious Freedom Act (42 U.S.C. §1996), Section 106 of the NHPA (36 CFR Part 800), the Native American Graves Protection and Repatriation Act (25 U.S.C. §§ 3001-3013), NEPA, 42 U.S.C. §§ 4321 *et seq.*), and EO 13175 - Consultation and Coordination with Indian Tribal Governments (65 FR 67249). On March 30, 2022, a letter was sent initiating government-to-government consultation on the Project. On August 5, 2022, BLM invited the 17 Tribes to participate in field surveys of the Project area. Tribal Historic Preservation Officers (THPOs) from the Standing Rock, Rosebud, and Crow responded to the invitation to participate in field surveys.

On September 12, 2022, Traditional Cultural Specialists (TCSs) from Rosebud, Standing Rock, and Crow, representatives from the BLM, Burns & McDonnell, and Denbury participated in a Project kickoff meeting in Baker, Montana to discuss the Project and associated field surveys. From September 12 to 23, 2022, the Rosebud, Standing Rock, and Crow TCS and archaeologists from Burns & McDonnell completed Class III intensive survey of 2,185 acres centric to the submitted plan infrastructure of the POD. On September 25, 2023, a letter sharing the results of the Class III cultural inventory, including the POD, was sent to all 17 Tribes. No concerns were presented by the Tribes.

The BLM has continued to notify the 17 Tribes of important milestones in the NEPA process, inviting each to participate in scoping and EA comment periods. The Northern Arapaho THPO provided comments on the EA on March 15, 2024, noting that there may be one or more cultural resources or eligible historic properties within the APE, and the probability of properties of religious and cultural significance to the Northern Arapaho is low. The THPO requested to be contacted if any traditional cultural properties, rock features, or human remains are found during excavation with any new ground disturbance. No comments from other Native American Tribes were received on the EA.

U.S. Fish and Wildlife Service

Under the provisions of Section 7(a)(2) of the Endangered Species Act of 1973 ([ESA], 16 U.S.C. §§ 1531-1544), federal agencies that carry out, permits, licenses, funds, or otherwise authorizes an activity must ensure their activities are not likely to jeopardize the continued existence of federally listed species or destroy or adversely modify designated critical habit. Burns and McDonnell contacted the USFWS regarding species to consider in the analysis. In a May 4, 2022 letter, the USFWS indicated that additional efforts for protected butterfly species (e.g., Dakota skipper [*Hesperia dacotae*]) would not be needed for the Project in conjunction with ESA Section 7 coordination. The USFWS also provided recommendations for habitat assessments and acoustic surveys that could be conducted to

characterize the potential bat population in the Project area. Acoustic surveys and habitat assessments were completed, and although no NLEBs were identified during these survey efforts, the surveys were not designed to determine the presence or probable absence of NLEBs in the Project area. In accordance with USFWS interim guidance and survey guidelines released in March 2023, even though NLEB was not identified through surveys or assessments in the project area, the BLM assumed NLEB was present as survey efforts did not meet the requirements to assume probable absence.

During the initial coordination with the USFWS, the NLEB was listed as Threatened under the ESA; however, on March 31, 2023, the NLEB was reclassified as a federally Endangered species. The BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in this EA, would have *no effect* on the NLEB. However, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction *may affect* the NLEB, other listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA. See Section 1.7.4 above for additional information.

U.S. Environmental Protection Agency Region 8

The EPA is the permitting agency for Class VI injection wells. Under the SDWA of 1974, The UIC Class VI permitting process is a reiterative process that includes an extensive review of site-specific data and modeling for two different approvals, the construction (drilling) permit and the authorization to inject. The BLM MCFO and Denbury have been in close coordination with EPA Region 8 staff throughout 2022 and 2023 regarding the Project, UIC permit requirements, and the UIC permit review process. EPA Region 8 staff participated in the March 5 and 6, 2024 public meetings and April 30, 2024 with Carter County to address questions on the UIC program and regulatory requirements. The BLM would continue to coordinate with the EPA throughout the UIC permit review process and would provide comments on measures to protect federal minerals for each proposed Class VI injection well. See POD Appendix A for further details on the EPA permitting process and regulatory requirements.

U.S. Army Corps of Engineers

The USACE regulates the placement of dredged and fill material in Waters of the U.S., including jurisdictional wetlands under the CWA Section 404 (33 U.S.C § 1344). The BLM MCFO and Denbury met with USACE representatives on June 5, 2023 to introduce the Project and discuss potential permit requirements. A follow up meeting was held on November 2, 2023. The USACE confirmed that anticipated wetland and stream impacts would likely be eligible for verification under an NWP. See POD Section 5.4 for details on water, wetland, and riparian crossings and POD Appendix R for associated maps. Prior to construction, Denbury would be responsible for submitting a pre-construction notification, if required by the applicable NWP conditions or its regional condition, to the USACE for eligibility verification.

Pipeline and Hazardous Materials Safety Administration

PHMSA regulates the construction, operation, and maintenance of CO_2 pipelines (49 CFR Parts 190, 195, and 196). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. See POD Sections 4.2 and 7.1 for additional information on pipeline construction and safety standards. The BLM MCFO met with PHMSA on November 13, 2023 for a Project introduction and to discuss pipeline safety standards and regulations.

Montana Sage Grouse Habitat Conservation Program

The Montana Greater Sage Grouse Stewardship Act (87-5-901 – 97-5-918, MCA) and Montana EO 12-2015 together comprise the Montana Sage Grouse Conservation Strategy, which is implemented through the Program. Since 2021, the Program and BLM MCFO have worked with Denbury to achieve more effective conservation across affected lands to ensure compliance with the 2015 MCFO RMP and the State's EO 12-2015. In its letter dated September 11, 2023, the Program concluded that the proposed activities that are presented in Denbury's Greater Sage-Grouse Mitigation Plan are consistent with the Montana Sage Grouse Conservation Strategy. See POD Appendix I for a copy of the approved mitigation plan.

Montana Fish, Wildlife, and Parks

The MTFWP is responsible for managing resident wildlife populations in the state. The BLM engaged with MTFWP through various correspondence and meetings on the Project throughout 2022 and 2023. Staff from MTFWP and BLM coordinated on wildlife and associated habitat data, design features, and mitigation measures incorporated in the Project.

Montana Department of Natural Resources and Conservation

The Montana DNRC would be responsible for reviewing and issuing agreements for activities on State lands which may include leases, ROWs, and/or temporary use permits. The Montana BOGC is responsible for issuing drilling permits. The BLM MCFO and Denbury have been in close coordination with Montana DNRC and BOGC staff throughout 2022 and 2023 regarding the Project. The BLM would continue to coordinate with the Montana DNRC and BOGC during the permitting and execution of the stratigraphic test well. In spring 2025, the BLM Montana/Dakotas State Office conducted additional outreach with Montana DNRC to address their concerns associated with the stratigraphic test well location being on state lands.

Carter County

The BLM met with Carter County officials regarding the proposed action during the initial planning stages on April 19, 2022 and again on September 18, 2023, in advance of the scoping period. Denbury also met independently with Carter County Commissioners on March 14, 2022, and with the Missouri River Basin Grazing Association on August 23, 2022, upon request of Grazing Association. The BLM, EPA, and Denbury also participated in a Carter County Commissioner meeting on April 30, 2024. Upon request of the Northern Plains Resource Council (NPRC), the BLM met with NPRC, Carter County officials, and landowners on May 15, 2024 and June 25, 2024 to discuss their concerns. On June 9, 2025, the MCFO attended the Carter County Commissioner meeting to discuss letters previously submitted on February 10, 2025 and March 10, 2025 by Carter County requesting to be a cooperating agency on the MCFO land use plan and the rescinding of EOs. At the June 9, 2025 meeting, the BLM provided further clarification on cooperating agency regulatory requirements and application of new EOs. On July 10, 2025, the Commissioners submitted a third letter requesting to be a cooperating agency on this EA. Due to the Commissioner's request being made at the time the BLM had updated the EA, designating Carter County as a cooperating agency would not provide an adequate timeline to provide NEPA review for the County or continuity of the Project. As disclosed above, the BLM has had meaningful engagement with the Commissioners early and throughout the NEPA review process for this project.

Denbury would continue to coordinate with Carter County throughout the life of the Project. Emergency response officials would be provided with training on how to respond to Project-related emergencies and would be invited to participate in annual table-top drills with Denbury's operations personnel. See POD Section 7.1 and POD Appendix W for information about Denbury's public

outreach program and Emergency Response Plan that would follow the guidelines included in the *CO_2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and Initial Response to a Pipeline Release of Carbon Dioxide (CO_2)* (API 2023).

Appendix A: List of Document Preparers / Reviewers

Name	Title	Resource Area
BLM		
Irma Nansel	Planning and Environmental Coordinator	Project Lead/NEPA
Dan Brunkhorst	Planning and Environmental Specialist	NEPA/Reviewer
David Wood	Wildlife Biologist	Greater Sage-Grouse/Reviewer
Beth Klempel	Assistant Field Manager	Lands and Realty
Mark Peterson	Physical Scientist (Air Quality)	Air Resources
CJ Truesdale	Archaeologist	Paleontology, Cultural Resources, Tribal Consultation
Amy Stillings	Socioeconomic Specialist	Social and economic conditions
Fiona Petersen	Wildlife Biologist	Wildlife; Greater Sage-Grouse
Josh Buckmaster	Soil Scientist	Soils/Reclamation
Christopher Morris	Hydrologist	Water Resources
Christina Stuart	Fisheries Biologist	Aquatics/Fisheries
Dena Sprandel-Lang	Outdoor Recreation Planner	VRM, Recreation
Brenda Witkowski	Weed Supervisor	Noxious/Invasives
Matt Lewin	Range Management Specialist	Vegetation, Livestock Grazing
Carissa Shilling	Geologist	Solid Minerals
Paul Helland	Petroleum Engineer	Fluid Minerals
Contractor (Burns & McDonnell)		
Sarah Binckley	NEPA Specialist	NEPA

Name	Title	Resource Area
Taylor Volkers	Air Quality Specialist	Air Quality
Tess Fuller	Air Quality Specialist	Air Quality
Mary Hauner-Davis	Air Quality Specialist	Air Quality
Marcia Bender	Archaeologist	Archaeology, Tribal Consultation
Shari Cannon-Mackey	Socioeconomic Specialist	Social and economic conditions
Gabriel Weger	Noise Specialist	Noise Quality
Bryan Gasper	Wildlife Biologist	Wildlife; Greater Sage-Grouse

Appendix B: Acronyms and Abbreviations

AoR	Area of Review
APE	Area of Potential Effects
AQRV	Air Quality Related Value(s)
AUM	Animal Unit Months
AV-APE	Audio Visual - Area of Potential Effects
BLM	Bureau of Land Management
BMPs	best management practices
BOGC	Board of Oil and Gas Conservation
CA	Confirmed Active
CAA	Clean Air Act
CCA	Cedar Creek Anticline
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CH_4	methane
CI	Confirmed Inactive
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
Crow	Crow Nation
CWA	Clean Water Act
dBA	A-weighted decibel
DDCT	Density Disturbance Calculation Tool
Denbury	Denbury Carbon Solutions, LLC, a wholly owned subsidiary of Denbury Inc.
Department or DOI	Department of the Interior
DNRC	Department of Natural Resources & Conservation
dv	deciview
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act of 1973
FLPMA	Federal Land Policy and Management Act of 1976
FR	Federal Register
FTE	full-time equivalent(s)
GHG	greenhouse gas
GHGRP	Greenhouse Gas Reporting Program
GRSG	Greater Sage-Grouse
GWIC	Ground Water Information Center

GWP	global warming potential
HAP	hazardous air pollutants
HQT	habitat quantification tool
HUC	Hydrologic Unit Code
IMPROVE	Interagency Monitoring of Protected Visual Environments
IPCC	Intergovernmental Panel on Climate Change
IWG	Interagency Working Group on the Social Cost of Greenhouse Gas Emissions
L_{50}	sound pressure level exceeded 50% of the time
km	kilometers
Ksat	Saturated Hydraulic Conductivity
MAAQS	Montana Ambient Air Quality Standards
MCFO	Miles City Field Office
MD	management decision
MDEQ	Montana Department of Environmental Quality
mg/L	milligrams per liter
MOA	Minutes-Of-Angle
MRV	Monitoring, Reporting, and Verification
MTFWP	Montana Fish, Wildlife, and Parks
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NCA	Never Confirmed Active
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NLEB	northern long-eared bat
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOCH1	Northern Cheyenne Reservation
NOx	nitrogen oxides
NPRC	Northern Plains Resource Council
NPS	National Park Service
NRHP	National Register of Historic Places
NSPS	New Source Performance Standards
NWP	Nationwide Permit
O_3	ozone
PGM	Photochemical Grid Modeling
PHMA	Priority Habitat Management Area
PHMSA	Pipeline and Hazardous Materials Safety Administration
PM	particulate matter
PM_{10}	particulate matter with a diameter of less than 10 microns
$PM_{2.5}$	particulate matter with a diameter of less than 2.5 microns

POD	Plan of Development
Program	Montana Sage Grouse Habitat Conservation Program
Project	Snowy River Carbon Dioxide (CO_2) Sequestration Project
PSD	Prevention of Significant Deterioration
RMP	Resource Management Plan
Rosebud	Rosebud Sioux Tribe
ROW	right(s)-of-way
SAR	sodium adsorption ratio
SCADA	Supervisory Control and Data Acquisition
SDWA	Safe Drinking Water Act
SEIS	Supplemental Environmental Impact Statement
SF-299	SF-299 Application for Transportation and Utility Systems and Facilities on Federal Lands
SF_6	sulfur hexafluoride
SHPO	State Historic Preservation Office
SO_2	sulfur dioxide
SPCC	Spill Prevention, Control, and Countermeasure
Standing Rock	Standing Rock Sioux Tribe
TAWS	Targeted Annual Warning System
TCP	Traditional Cultural Property
TCS	Traditional Cultural Specialists
TDS	total dissolved solids
THPO	Tribal Historic Preservation Officer
T&M	Testing and Monitoring
UC	Unconfirmed
UDP	Unanticipated Discoveries Plan
UIC	Underground Injection Control
U.S.	United States
USACE	U.S. Army Corps of Engineers
U.S.C.	United States Code
USDW	underground sources of drinking water
USDOT	U.S. Department of Transportation
USFWS	U.S. Fish and Wildlife Service
USGCRP	U.S. Global Change Research Program
USGS	U.S. Geological Survey
VOC	volatile organic compounds
VRM	visual resource management
WNV	West Nile virus

Appendix C: List of References

40 Code of Federal Regulations (CFR) Part 98. Mandatory Greenhouse Gas Reporting.

Adams A., R. Byron, B. Maxwell, S. Higgins, M. Eggers, L. Byron, and C. Whitlock. Climate change and human health in Montana: a special report of the Montana Climate Assessment. Montana State University, Institute on Ecosystems, Center for American Indian and Rural Health Equity, Bozeman. 2021.

Alcalde J, Flude S, Wilkinson M, Johnson G, Edlmann K, Bond CE, Scott V, Gilfillan SMV, Ogaya X, Haszeldine RS. Estimating geological CO_2 storage security to deliver on climate mitigation. Nature Communications. 2018.

Almberg, E., M. Becker, J. Ramsey, and K. Smucker. Montana's 2022 Annual White-nose Syndrome Surveillance Report. 2022.

Ambrose, Skip, C. Florian, J. Olnes, J. MacDonald, T. Hartman. Sagebrush Soundscapes and the Effects of Gas-Field Sounds on Greater Sage-Grouse. Western Birds 52(1): 23-46. 2021.

American Petroleum Institute. Carbon Dioxide (CO_2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO_2). Washington, DC: API Publishing Services. November 2023.

Anthony, Robert G., and Mitchell J. Willis. Survival rates of female greater sage - grouse in autumn and winter in southeastern Oregon. The Journal of Wildlife Management 73(4): 538-545. 2009.

Avian Power Line Interaction Committee. Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006. Washington, D.C. and Sacramento, CA: Edison Electric Institute, APLIC, and the California Energy Commission. 2006.

Barnett, Kirk L., and Sarah L. Facey. Grasslands, invertebrates, and precipitation: a review of the effects of climate change. Frontiers in Plant Science 7:197607 2016.

Beaucham, C., King, B., Feldmann, K., Harper, M., & Dozier, A. Assessing occupational erionite and respirable crystalline silica exposure among outdoor workers in Wyoming, South Dakota, and Montana. Journal of Occupational and Environmental Hygiene. Abingdon-on-Thames, Oxfordshire, United Kingdom: Taylor & Francis Group. 2018.

Bender, Marcia, Christina Huling, Melinda McCarthy, Stuart Postiglione, Jacob Schaffer, and Shannon Spurgeon. Cultural Resource Inventory of the Snowy River CO_2 Sequestration Project, Carter County, MT. MT-020-22-38. Manuscript on file at BLM Miles City Field Office, Miles City, MT. 2023.

Bureau of Land Management (BLM). Miles City Field Office Final Supplemental Environmental Impact Statement and Resource Management Plan Amendment. 2024a.

Bureau of Land Management (BLM). 2023 BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends from Coal, Oil, and Gas Exploration and Development on the Federal Mineral Estate. 2024b.

Bureau of Land Management (BLM). Montana/Dakotas State Office PGM Modeling Study Air Resource Impact Assessment Report. 2016.

Bureau of Land Management (BLM). Miles City Field Office Approved Resource Management Plan. 2015.

Center for Disease Control. Historic Data (1999-2022). Centers for Disease Control and Prevention, National Center for Emerging and Zoonotic Infectious Diseases (NCEZID), Division of Vector-Borne Diseases (DVBD). Atlanta, GA. 2023

Coates, Peter S., et al. Range-wide population trend analysis for greater sage-grouse (*Centrocercus urophasianus*)—Updated 1960–2022. No. 1175. US Geological Survey, 2023.

Connelly J.W., C.A. Hagen, and M.A. Schroeder. Characteristics and Dynamics of Greater Sage-Grouse Populations. In Greater Sage-Grouse: Ecology and Conservation of a Landscape Species and Its Habitats, pp. 53–67, edited by S.T. Knick and J.W. Connelly. Studies in Avian Biology No. 38. Berkeley: University of California Press and Norman, Oklahoma: Cooper Ornithological Society. 2011.

Connelly, J.W., M.A. Schroeder, A.R. Sands, and C.E. Braun. Guidelines to Manage Sage Grouse Populations and Their Habitats. Wildlife Society Bulletin 28 (4):967–985. 2000.

Cornell Wildlife Health Lab. West Nile Virus. Retrieved from https://cwhl.vet.cornell.edu/disease/west-nile-virus. n.d.

Davidson, C. B. Aquifer Descriptions from the U.S. Geological Survey Regional Aquifer System Analysis Program, 1978-1993. Reston, Virginia: U.S. Geological Survey. 1994.

Denbury. Plan of Development Snowy River CO_2 Sequestration Project. Denbury Carbon Solutions, LLC. 2025.

Dinkins, Jonathan B., Michael R. Conover, Christopher P. Kirol and Jefferey Beck. Greater Sage-Grouse (*Centrocercus urophasianus*) select nest sites and brood sites away from avian predators. The Auk. 129(4);600-610. 2012.

Doherty, Kevin Eric. Sage-Grouse and Energy Development: Integrating Science with Conservation Planning to Reduce Impacts. University of Montana, 2008.

Downey, J. S. Geohydrology of Bedrock Aquifers in the Northern Great Plains in Parts of Montana, North Dakota, South Dakota, and Wyoming. Washington, DC: U.S. Geological Survey. 1986.

Federal Land Manager Environmental Database. Available at https://views.cira.colostate.edu/fed/. Accessed January 2024.

Fedy BC, Doherty KE. Population cycles are highly correlated over long time series and large spatial scales in two unrelated species: greater sage-grouse and cottontail rabbits. Oecologia. 165:915-24. 2011.

Foster, Melissa A., John T. Ensign, Windy N. Davis, and Dale C. Tribby. Greater Sage-Grouse in the Southeast Montana Sage-Grouse Core Area. Available at https://www.pinedaleonline.com/pdfs/sagegrousereport.pdf. Accessed on November 16, 2023.

Gibson, Daniel, Erik Blomberg, Michael Atamian, and James Sedinger. Weather, habitat composition, and female behavior interact to modify offspring survival in Greater Sage-Grouse. Ecological Applications 27(1): 168-181. 2017.

Grid United. North Plains Connector. Available at https://northplainsconnector.com/. Accessed on July 21, 2025.

Harju, Seth M., Matthew R. Dzialak, Renee C. Taylor, Larry D. Hayden-Wing and Jeffrey B. Winstead. Thresholds and Time Lags in Effects of Energy Development on Greater Sage-Grouse Populations. The Journal of Wildlife Management 74(3): 437-448. 2010.

Headwaters Economics. Bureau of Land Management Socioeconomic Profile Tool. Available at https://headwaterseconomics.org/tools/blm-profiles/. Accessed December 2023.

Holloran, M.J. Greater Sage-Grouse (*Centrocercus urophasianus*) Population Response to Natural Gas Development in Western Wyoming. Ph.D. dissertation, Department of Zoology and Physiology, University of Wyoming, Laramie. 2005.

Holloran, Matthew J. and Stanley H. Anderson. Spatial Distribution of Greater Sage-Grouse Nests in Relatively Contiguous Sagebrush Habitats. The Condor. 107(4):742-52. 2005.

Ingelfinger, Franz. The effects of natural gas development on sagebrush steppe passerines in Sublette County, Wyoming. M.S., Department of Zoology and Physiology, May, 2001.

Intergovernmental Panel on Climate Change (IPCC). Guidelines for National Greenhouse Gas Inventories Chapter 5: Carbon Dioxide Transport, Injection, and Geological Storage. 2006.

Intergovernmental Panel on Climate Change (IPCC). AR6 Synthesis Report: Climate Change 2023. 2023.

Johnson, D.H., J.J. Holloran, J.W. Connelly, S.E. Hanser, C.L. Amundson, and S.T. Knick. Influences of environmental and anthropogenic features on Greater Sage-Grouse populations, 1997–2007. In Greater Sage-Grouse: Ecology and Conservation of a Landscape Species and its Habitats, Studies in Avian Biology, Vol. 38, S.T. Knick, and J.W. Connelly (eds), pp.407–450, University of Californian Press, Berkeley, CA, USA. 2011.

Kaczor NW, Jensen KC, Klaver RW, Rumble MA, Herman-Brunson KM, Swanson CC. Nesting success and resource selection of greater sage-grouse. In: Sandercock, Brett K.; Martin, Kathy; Segelbacher, Gernot, editors. Ecology, conservation, and management of grouse. Studies in Avian Biology. 39:107-118. 2011.

Loeser, Matthew RR, Thomas D. Sisk, and Timothy E. Crews. Impact of Grazing Intensity during Drought in an Arizona Grassland. Conservation Biology 21(1): 87-97. 2007.

Manier, D.J,, Z. Bowen, M. Brooks, M. Casazza, P. Coates, P. Deibert, S. Hanser, and D. Johnson. Conservation Buffer Distance Estimates for Greater Sage-Grouse – A Review. U.S. Geological Survey Open-File Report 2014-1329. 2014.

Mennitt, Daniel, Kirk Sherrill, and Kurt Fristrup. A geospatial model of ambient sound pressure levels in the contiguous United States. Journal of the Acoustical Society of America. 135: 2746-2764. 2014.

Merrill, Mathew D., Benjamin M. Sleeter, Phillip A. Freeman, Jinxun Liu, Peter D. Warwick, and Bradley C. Reed. Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14. Scientific Investigations Report 2018-5131. U.S. Geological Survey, Reston, Virginia: 2018.

Montana Department of Environmental Quality (MDEQ). Montana Base Numeric Nutrient Standards and Nutrient Standards Variances. Circular DEQ-12, Parts A and B. Helena, Montana: Montana Department of Environmental Quality. 2013. Retrieved from https://deq.mt.gov/files/Water/WQPB/Standards/NutrientWorkGroup/PDFs/CircularDEQ12_v6.7.pdf.

Montana Department of Environmental Quality (MDEQ). Montana Numeric Water Quality Standards. Circular DEQ-7. Helena, Montana: Montana Department of Environmental Quality. 2019.

Montana Ground Water Information Center (GWIC). Carter County Well Data, Montana Bureau of Mines and Geology. Available at: https://mbmggwic.mtech.edu. 2024.

Montana Fish, Wildlife, and Parks. Montana Greater Sage-grouse Population Report. 2022.

Montana Natural Resource Information System (NRIS). Montana Ground-Water Atlas. Helena, Montana. 1997.

Montana Sage Grouse Habitat Conservation Program. 2024 Annual Report. Retrieved from https://sagegrouse.mt.gov/documents/2024AnnualReport.

Montana Sage Grouse Oversight Team. Montana Mitigation System Habitat Quantification Tool Technical Manual for Greater Sage-Grouse. Version 1.1. December 2023.

Montana Sage Grouse Work Group. Management Plan and Conservation Strategies for Sage Grouse in Montana – Final. Available at: https://fwp.mt.gov/binaries/content/assets/fwp/conservation/wildlife-reports/sage-grouse/sgfinalplan.pdf/. 2005.

Moynahan BJ, Lindberg MS, Thomas JW. Factors Contributing to Process Variance in Annual Survival of Female Greater Sage-Grouse in Montana. Ecological Applications. 16(4):1529-38. 2006.

National Oceanic and Atmospheric Agency. Date snapshot details: NOWData. National Weather Service. Department of the Interior. Billings, MT. Retrieved from https://www.weather.gov/wrh/Climate?wfo=byz. n.d.a.

National Oceanic and Atmospheric Agency. Date snapshot details: Drought Monitor. Department of the Interior. Washington, DC. Retrieved from https://www.climate.gov/maps-data/data-snapshots/data-source-drought-monitor. n.d.b.

Naugle, David E., ed. Energy Development and Wildlife Conservation in Western North America. Island Press. 2011.

Naugle DE, Aldridge CL, Walker BL, Cornish TE, Moynahan BJ, Holloran MJ, Brown K, Johnson GD, Schmidtmann ET, Mayer RT, Kato CY. West Nile virus: Pending crisis for greater sage-grouse. Ecology Letters. 7(8):704-13. 2004.

O'Neil, Shawn T., et al. Broad-scale occurrence of a subsidized avian predator: Reducing impacts of ravens on sage-grouse and other sensitive prey. Journal of Applied Ecology 55(6): 2641-2652. 2018.

Parsons LA. Greater Sage-Grouse Survival, Breeding Ecology, Resource Selection, and West Nile Virus Prevalence on the Eastern Fringe of their Range. South Dakota State University; 2019.

Robinson AC. Management Plan and Conservation Strategies for Greater Sage-Grouse in North Dakota. North Dakota Game and Fish Department; 2014.

Skone, Timothy, Robert James III, Greg Cooney, Matt Jamieson, James Littlefield, and Joe Marriott. Gate-to-Gate Life Cycle Analysis Model of Saline Aquifer Sequestration of Carbon Dioxide. United States. 2013.

South Dakota Department of Game, Fish and Parks, Division of Wildlife. South Dakota Greater Sage-Grouse Action Plan 2022–2026. Wildlife Division Report Number 2022-01. Pierre, South Dakota, USA. 2022.

Smith, Joseph T., Jason D. Tack, Lorelle I. Berkeley, Mark Szczypinksi, and David E. Naugle. Effects of Livestock Grazing on Nesting Sage-Grouse in Central Montana. The Journal of Wildlife Management 82(7): 1503-1515. 2018.

Swanson CC. Ecology of greater sage-grouse in the Dakotas. South Dakota State University; 2009.

Taylor, R. L., B. L. Walker, D. W. Naugle, and S. Mills. Managing Multiple Vital Rates to Maximize Greater Sage-Grouse Population Growth. Journal of Wildlife Management 76(2):336–347. 2012.

Truesdale, CJ. Snowy River Carbon Capture and Storage Project: BLM report on NHPA responsibilities, impacts analysis, and cultural environment, BLM Project Number: MT-020-22-38C, MT-SHPO Project Number: 2023102609. October 2023.

Truesdale, CJ. Minutes of Angle – A Visual Analysis of a Proposed Carbon Sequestration Project and the Viewshed of the Chalk Buttes TCP, BLM Project Number: MT-020-22-38B, MT-SHPO Project Number: 2023092715. October 2023.

U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). Montana Stockwater Pipeline Manual. Bozeman, Montana: U.S. Department of Agriculture Natural Resource Conservation Service. 2004 (with Chapter 2 updated in 2016).

U.S. Department of Commerce, Bureau of the Census. 2020. 2016-2021 American Community Survey 5-Year Estimates (DP02, Selected Social Characteristics; DP03, Economic Characteristics; DP04, Housing Characteristics; and DP05, Demographics and Housing). Available at: https://www.census.gov/data.html. Accessed September 2023.

U.S. Environmental Protection Agency (EPA). Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021. 2023a.

U.S. Environmental Protection Agency (EPA). U.S. Environmental Protection Agency. Greenhouse Gas Inventory Data Explorer. Online at: https://cfpub.epa.gov/ghgdata/inventoryexplorer/#iallsectors/allsectors/allgas/gas/all. 2023b.

U.S. Environmental Protection Agency (EPA). Clean Air Act Section 112 List of Hazardous Air Pollutants: Amendments to the list of Hazardous Air Pollutants (HAP). 2022a.

U.S. Environmental Protection Agency (EPA). National Recommended Water Quality Criteria Tables. Retrieved from EPA.gov: https://www.epa.gov/wqc/national-recommended-water-quality-criteria-tables. 2022b.

U.S. Environmental Protection Agency (EPA). Secondary Drinking Water Standards: Guidance for Nuisance Chemicals. Washington, DC: U.S. Environmental Protection Agency. 2022c.

U.S. Fish and Wildlife Service (USFWS). 2013. Greater Sage-grouse (Centrocercus urophasianus) Conservation Objectives: Final Report. Denver, Colorado: U.S. Fish and Wildlife Service. 2013.

U.S. Geological Survey (USGS). National Land Cover Database 2019 Land Cover Science Product version 2.0. 2021.

U.S. Global Change Research Program (USGCRP). Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II [Reidmiller, D. R., C. W. Avery, D. R. Easterling, K. E. Kunkel, K. L. M. Lewis, T. K. Maycock, and B. C. Stewart (eds.)]. Washington, DC, USA. 2018.

Walker, B. L., D. E. Naugle, and K. E. Doherty. Greater Sage-Grouse Population Response to Energy Development and Habitat Loss. Journal of Wildlife Management 71(8):2644–2654. 2007.

Wallestad, R. O., and Schladweiler, P. Breeding Season Movements \and Habitat Selection of Male Sage Grouse. Journal of Wildlife Management. 38(4): 634–637.1974.

White, C. M., Strazisar, B. R., Granite, E. J., Hoffman, J. S., & Pennline, H. W. Separation and Capture of CO_2 from Large Stationary Sources and Sequestration in Geological Formations—Coalbeds and Deep Saline Aquifers. Journal of the Air & Waste Management Association. 53(6), 645–715. 2003.

Whitehead, R. L. Ground Water Atlas of the United States: Segment 8, Montana, North Dakota, South Dakota, Wyoming. Hydrologic Atlas 730-I. U.S. Geological Survey. 1996.

Appendix D: Figures

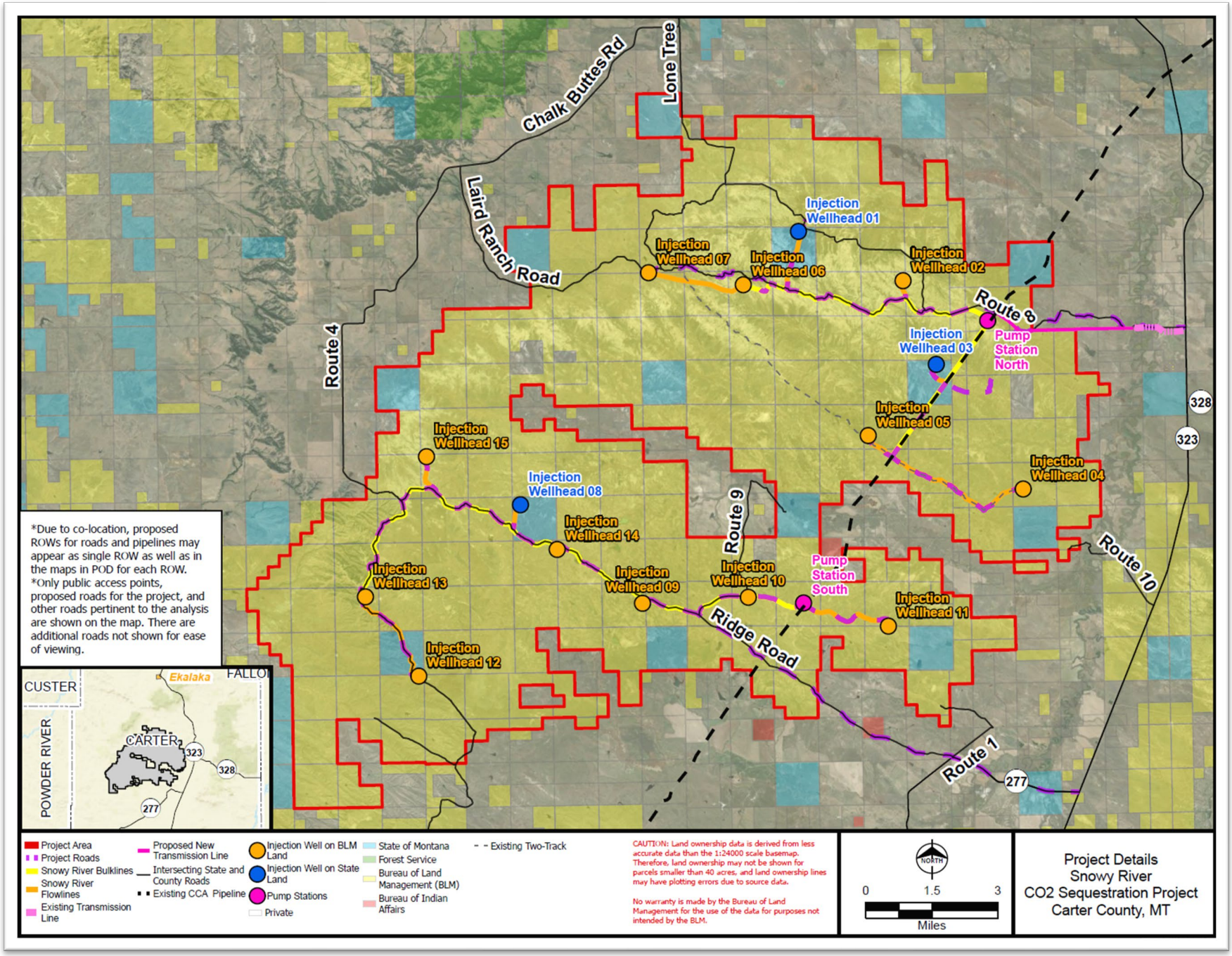


Figure 1: Snowy River CO_2 Sequestration Project Details

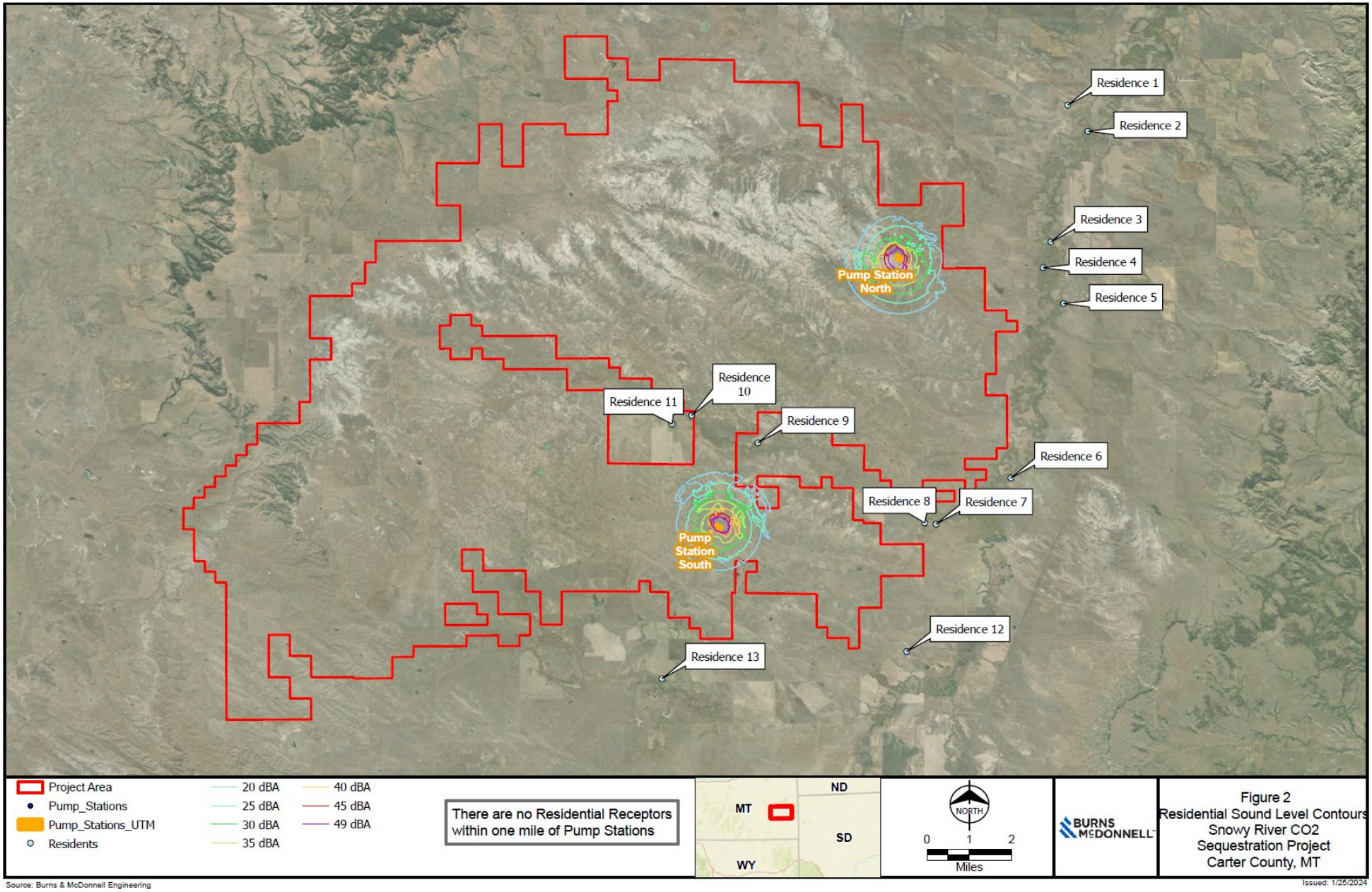


Figure 2: Residential Sound Level Contours

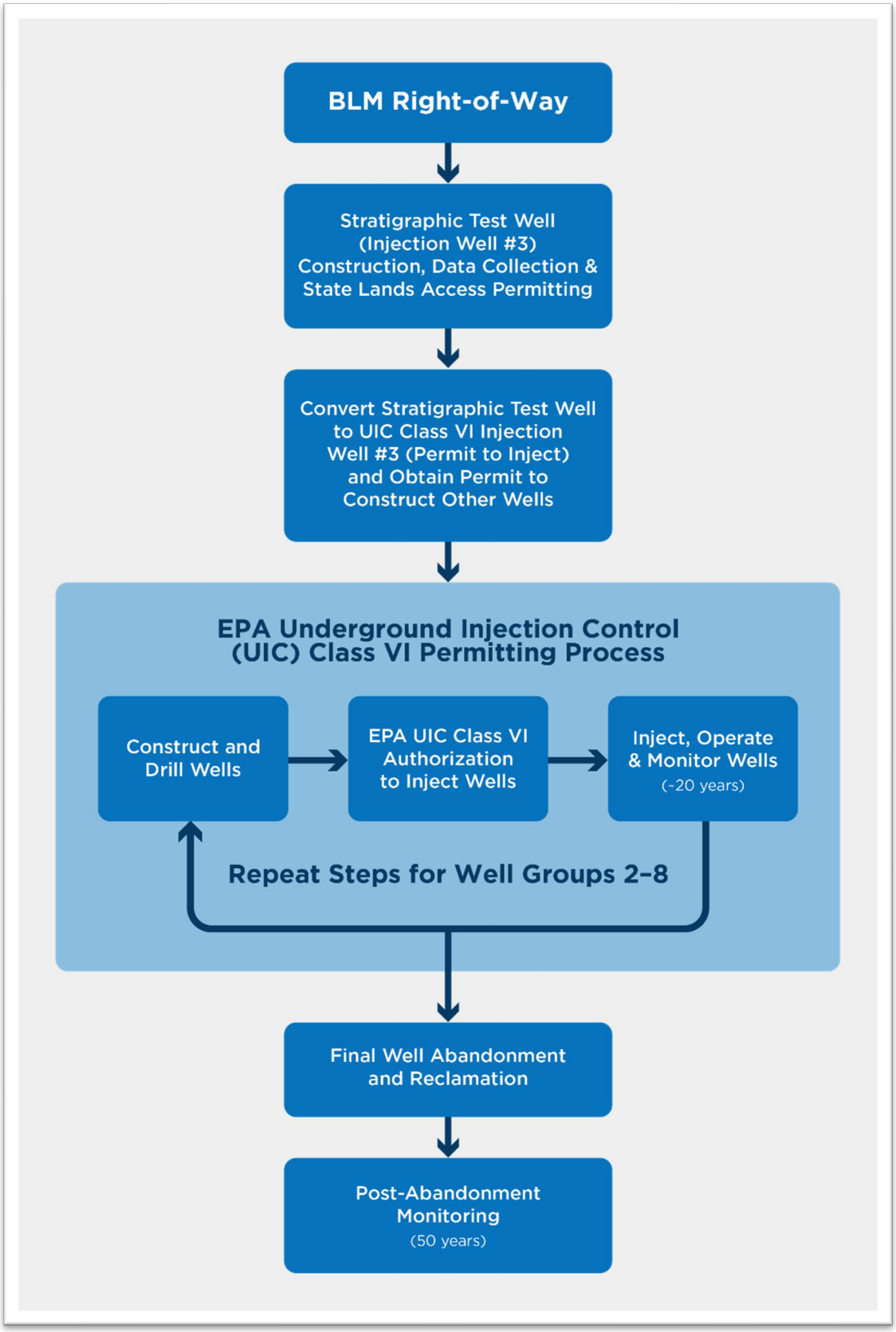


Figure 3: Project Sequence

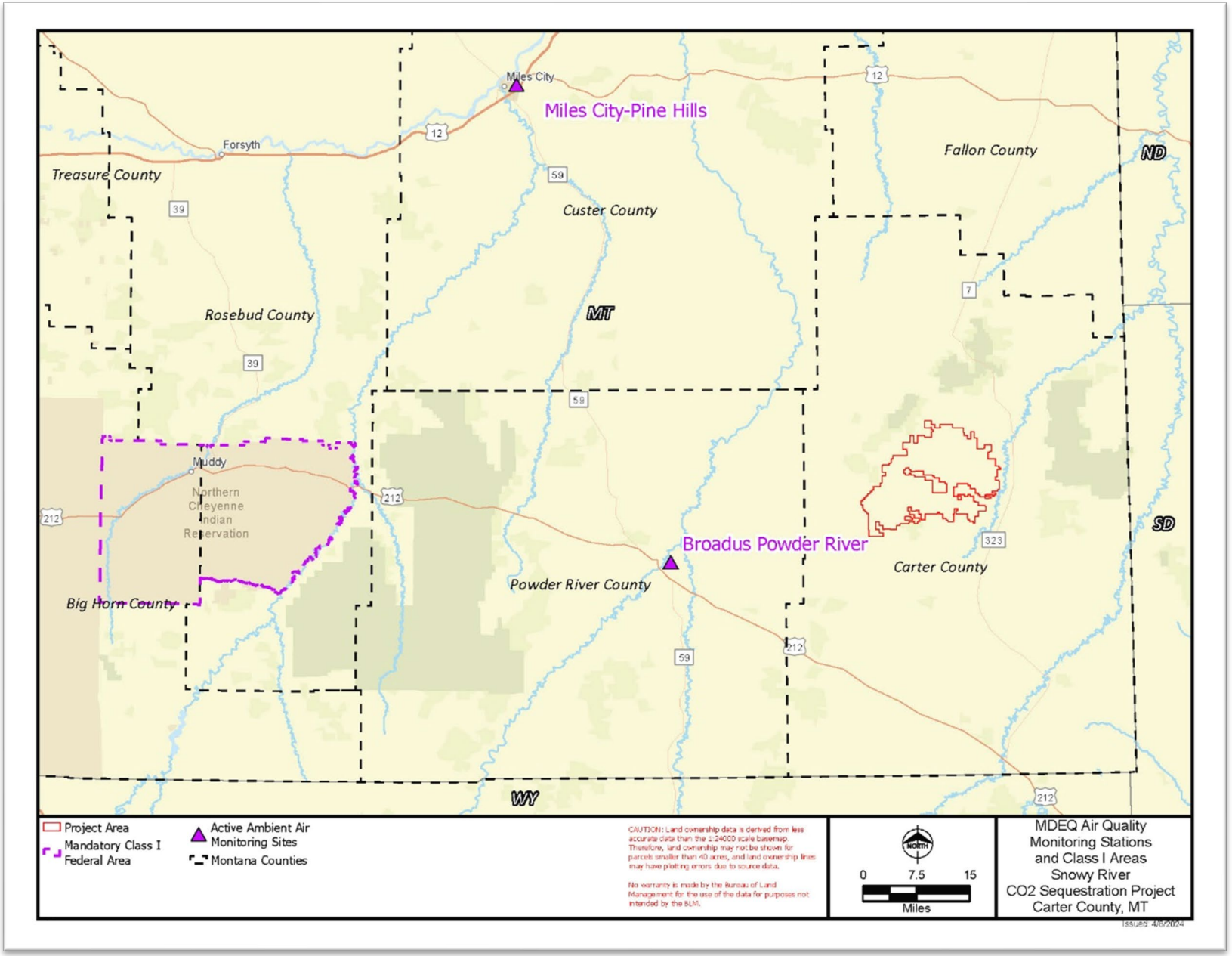


Figure 4: MDEQ Air Quality Monitoring Stations and Class I Areas

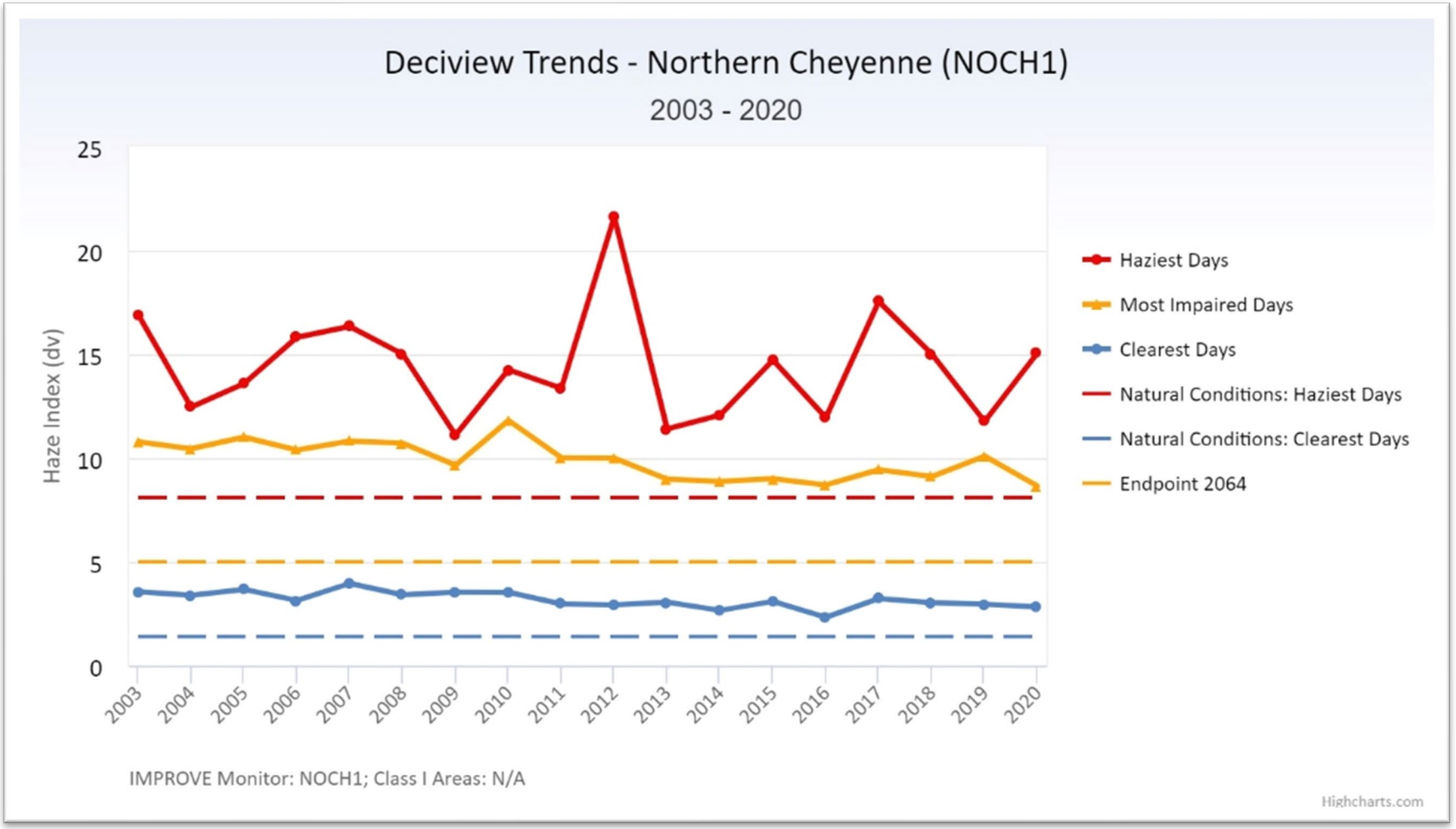


Figure 5: Visibility Trends at Northern Cheyenne (NOCH1) IMPROVE Monitor

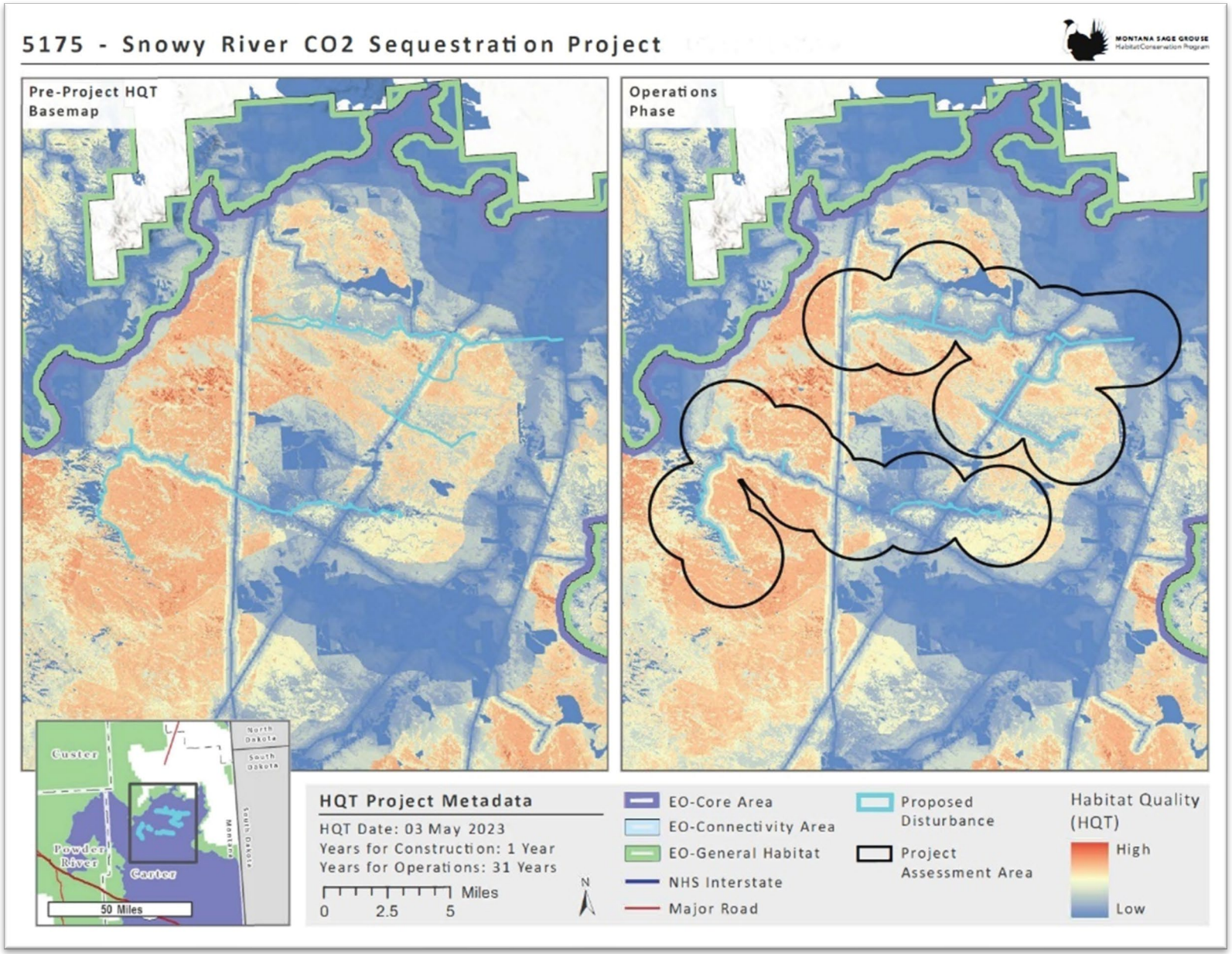


Figure 6: HQT Results for the Project Area
(provided by the Montana Sage Grouse Habitat Conservation Program)

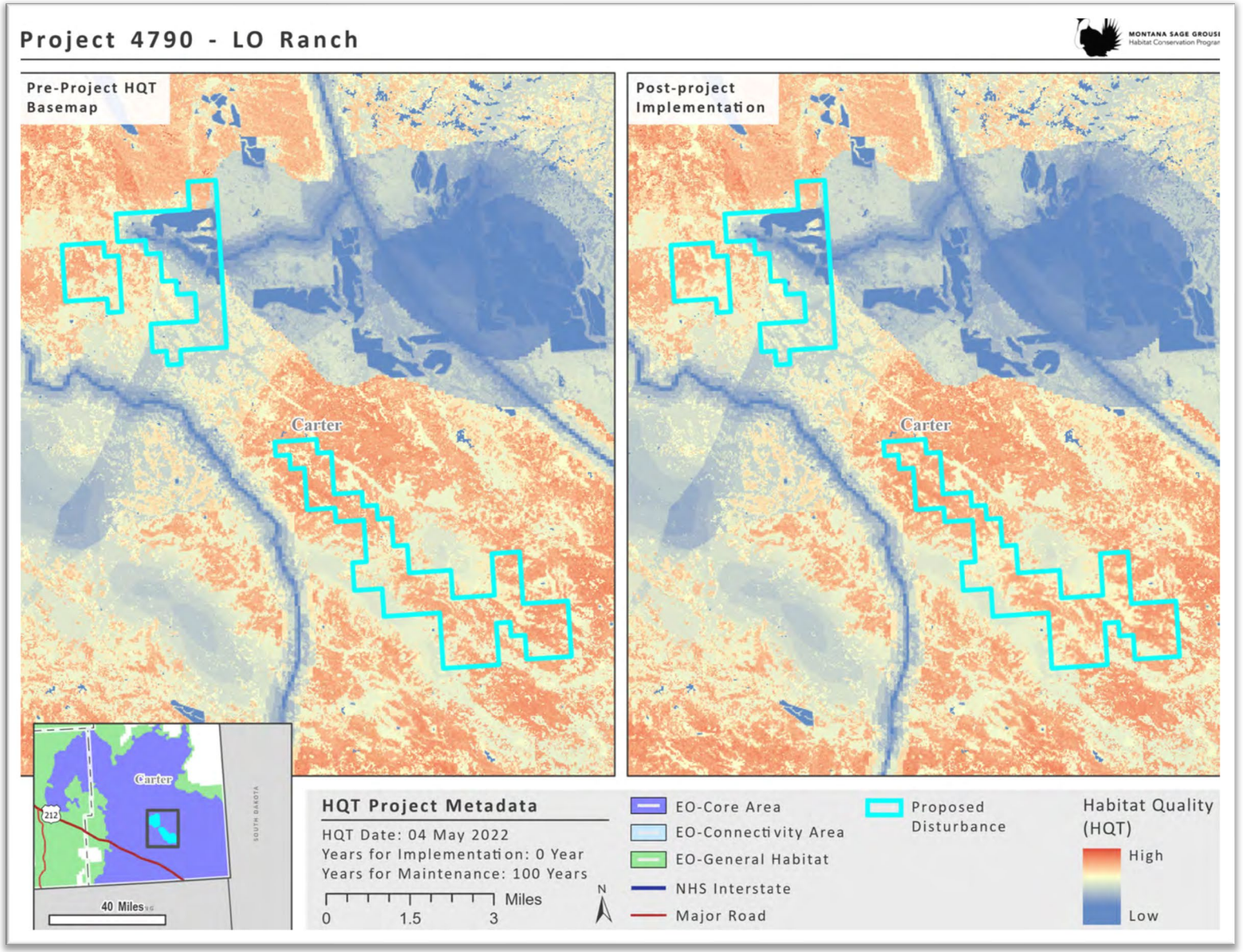
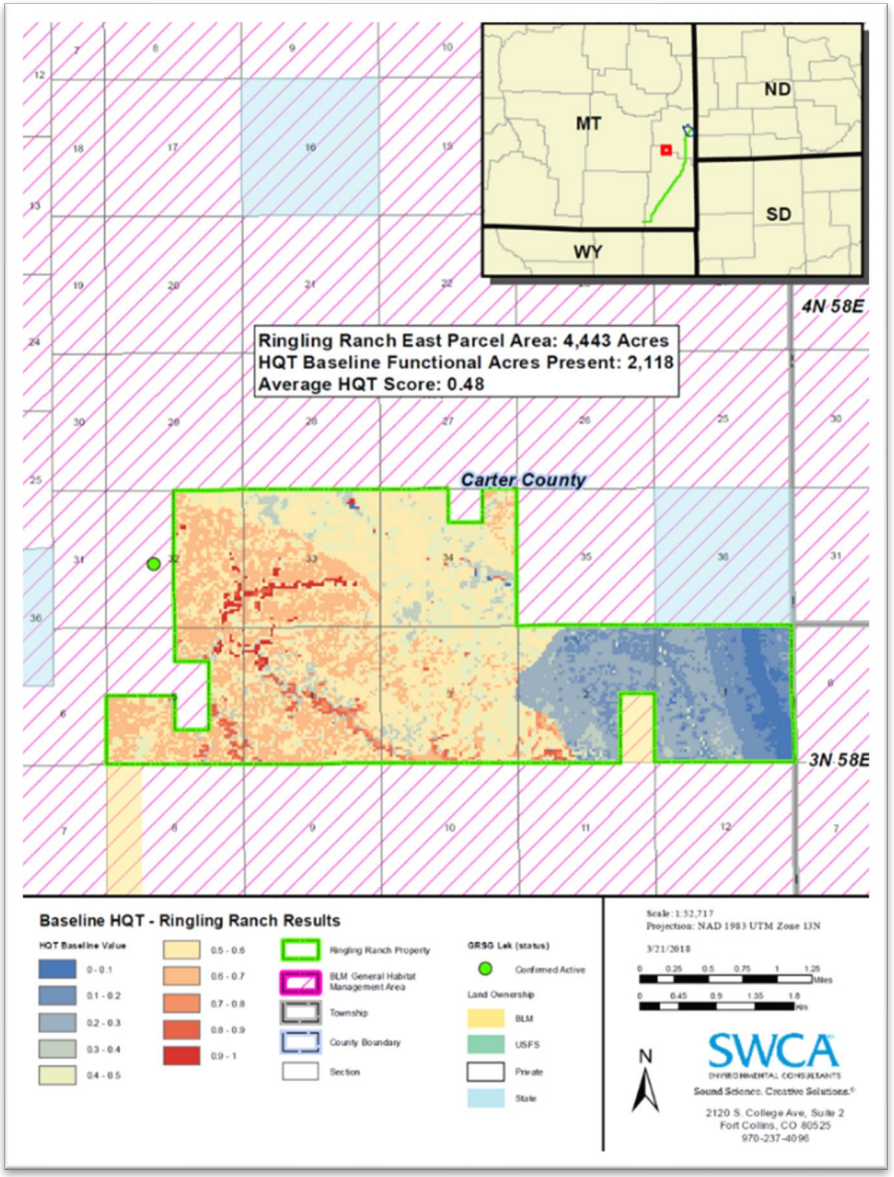


Figure 7: HQT Results for the LO Ranch
(provided by the Montana Sage Grouse Habitat Conservation Program)



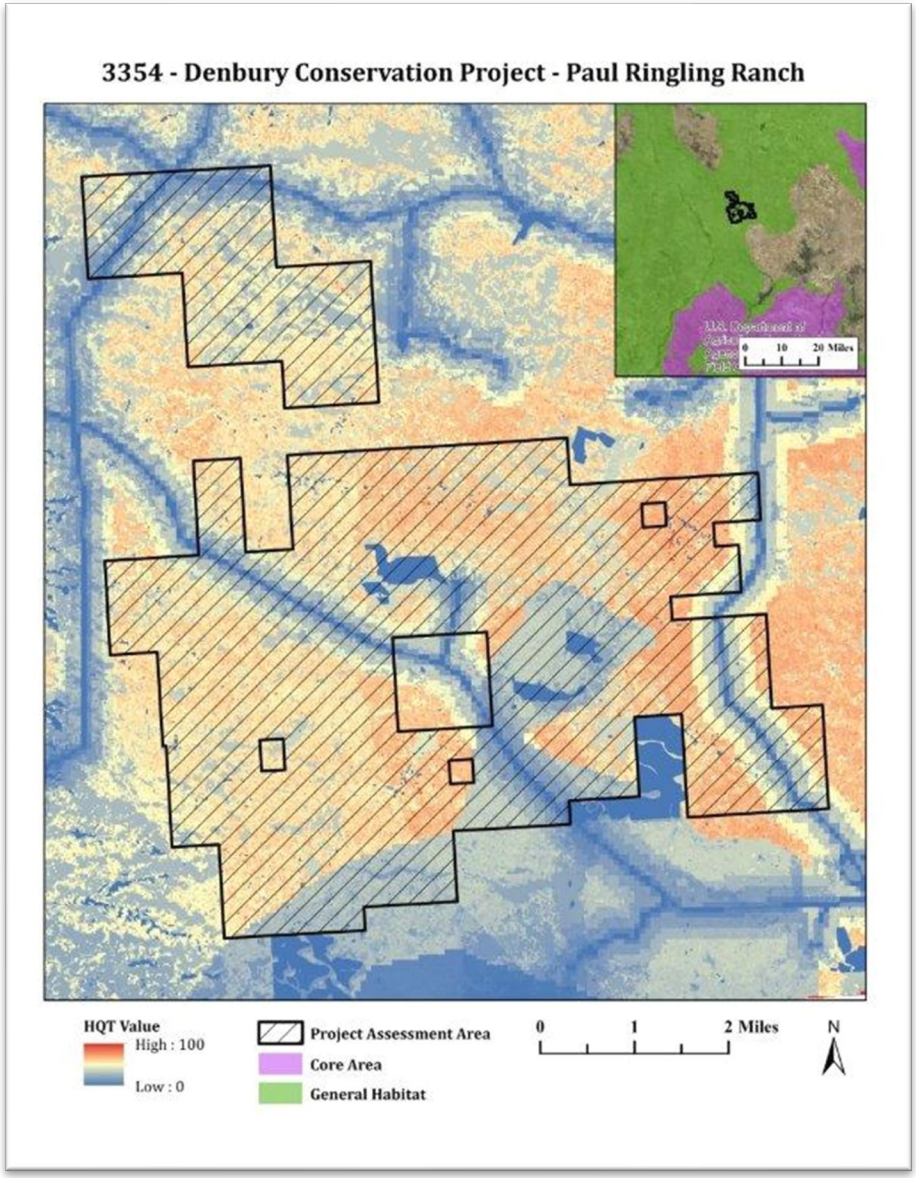


Figure 8: HQT Results for the Ringling Ranch II and Ringling Ranch III Sites (provided by the Montana Sage Grouse Habitat Conservation Program)

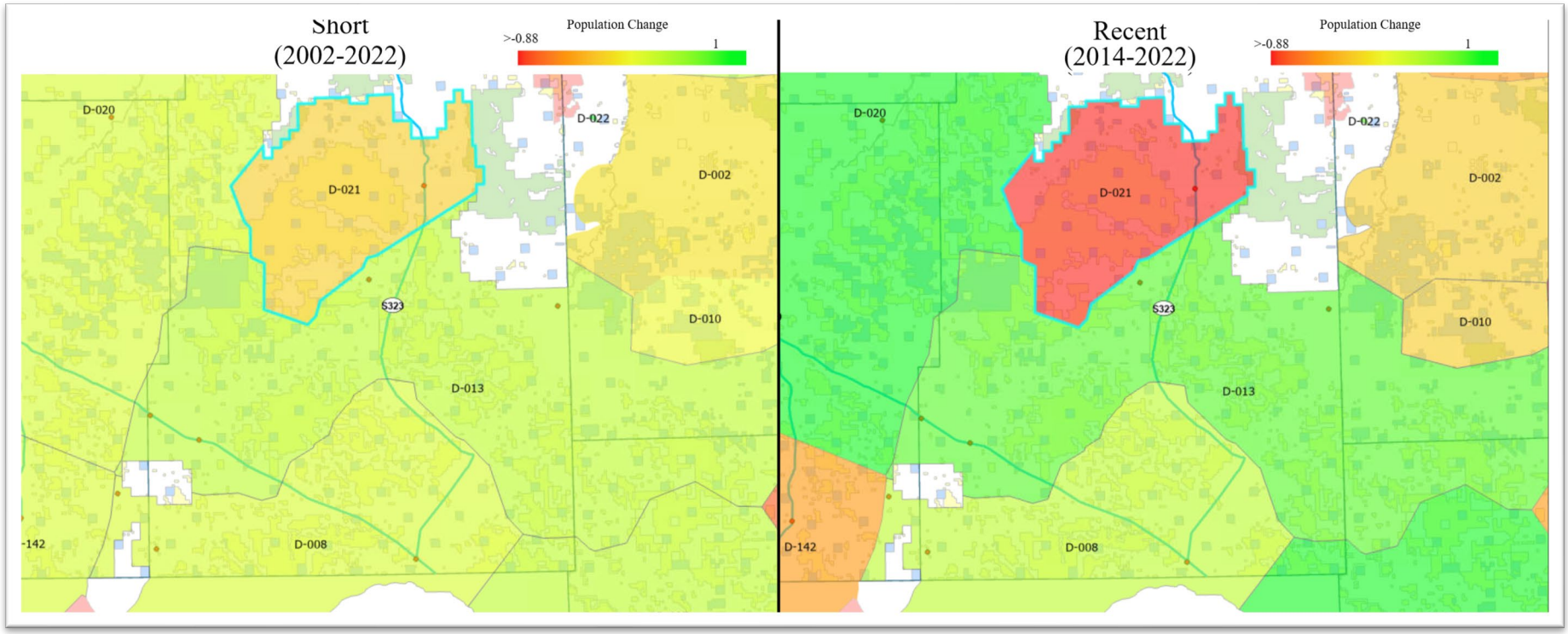


Figure 9: Population Changes from the USGS's TAWS Report for Sage-Grouse Cluster D-021 Compared to Neighboring Clusters on Short (using data from 2002 to 2022) and Recent (using only data from 2014-2022) Temporal Scales (Coates et al. 2023)

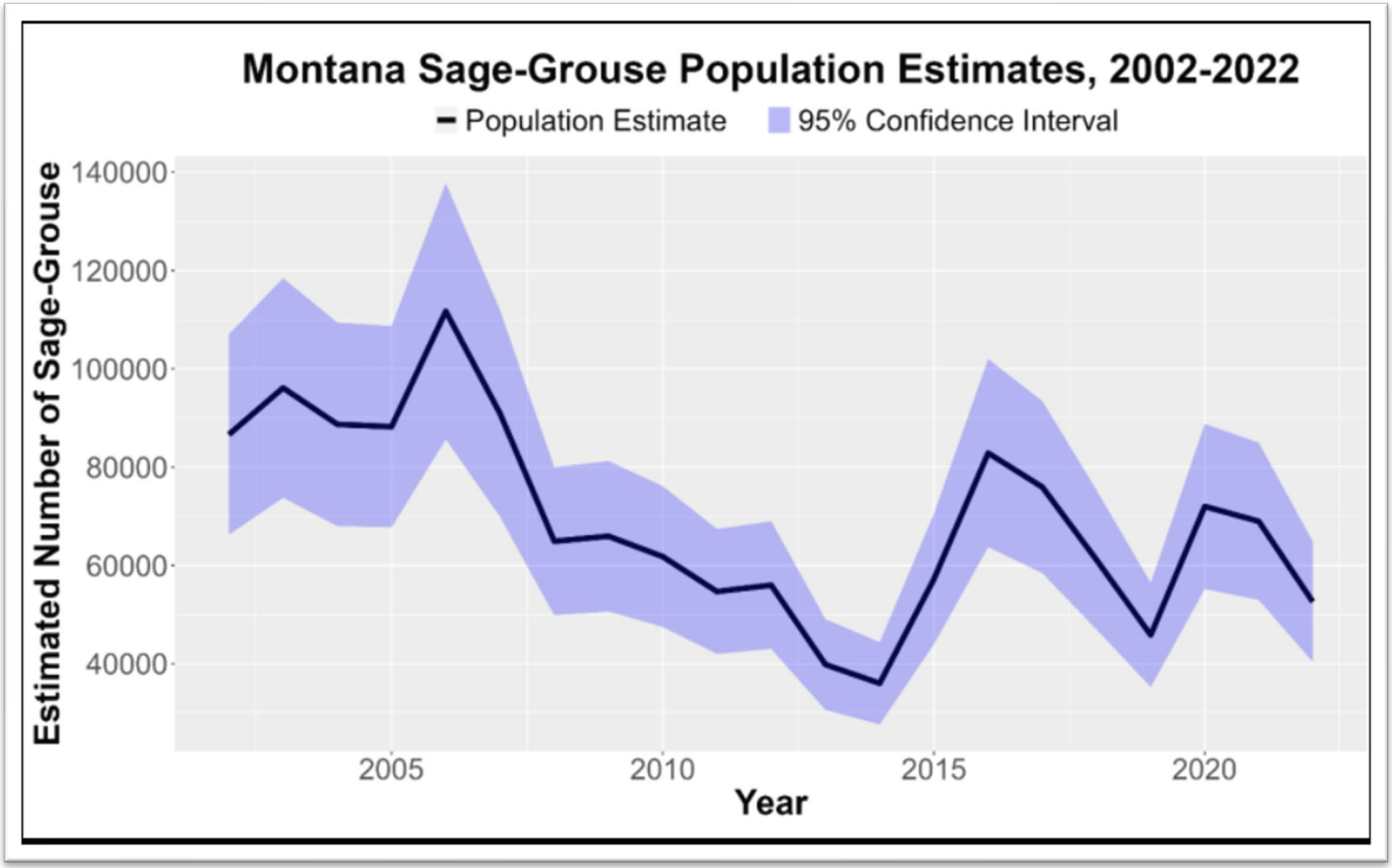


Figure 10: Overall Montana Sage-Grouse Population Estimates from 2002 to 2022 (MTFWP 2022)

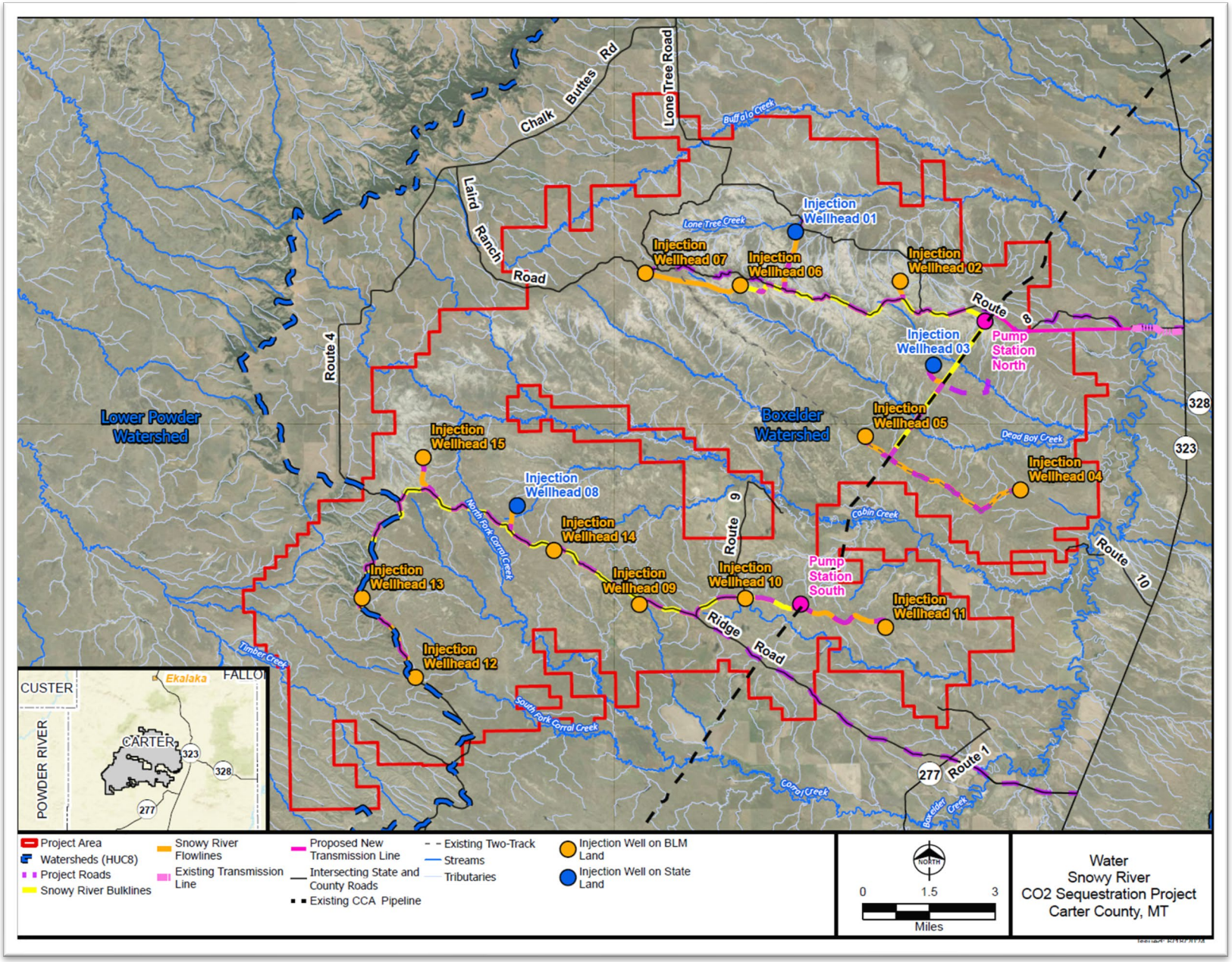


Figure 11: Watercourses and HUC-8 Watersheds in the Project Area

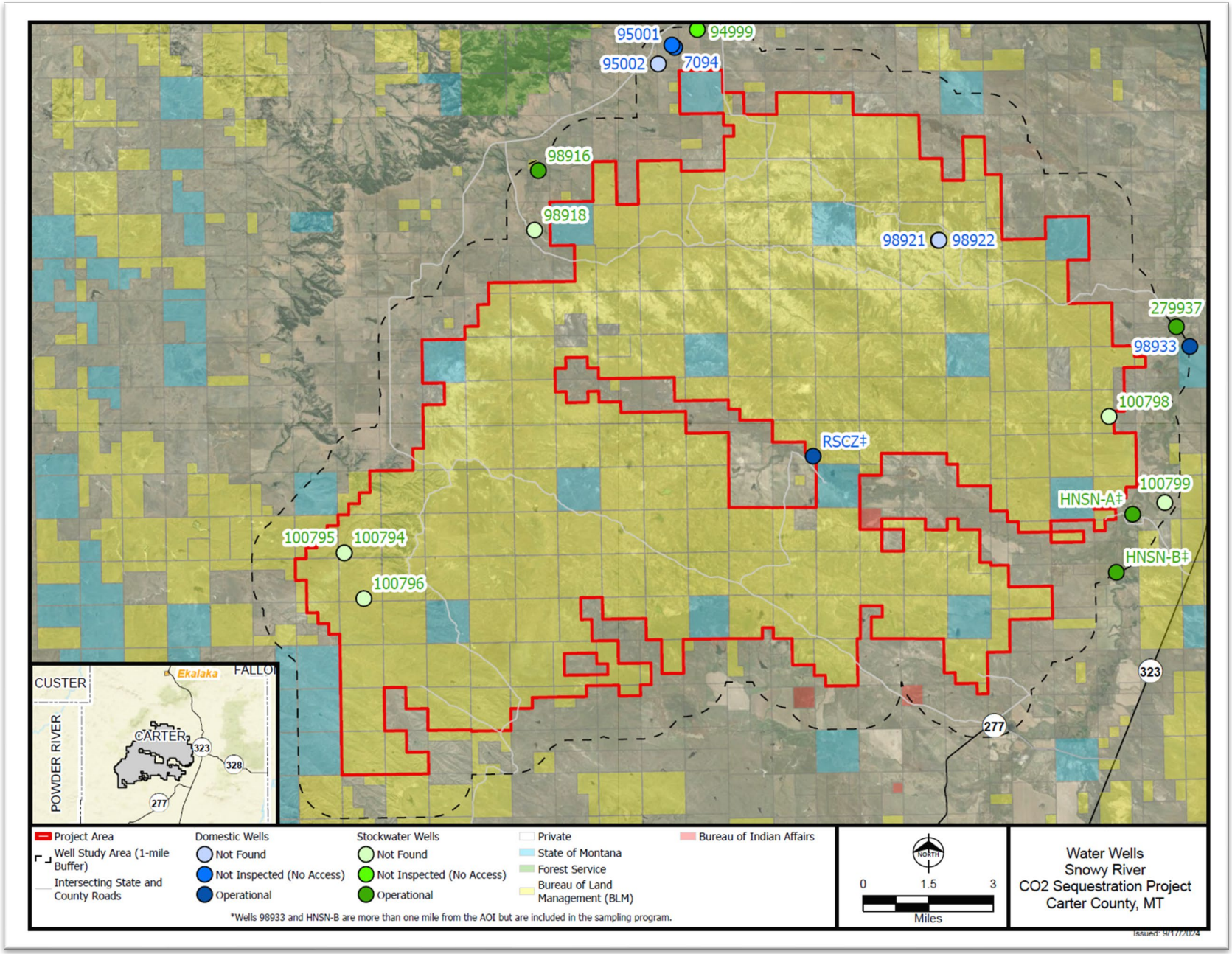


Figure 12: Domestic and Stockwater Wells within 1 Mile of the Project Area

Appendix E: Air Quality Analysis Calculations

Denbury Snowy River CO2 Project Emissions
Construction and Operational Emissions Summary

Construction Emissions Summary (U.S. Tons Total per Group)

	ROW Group	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-Year GWP CO_2e	100-Year GWP CO_2e	HAPS
Construction	Group 1	2.27	5.44E-03	0.05	343	7.53E-03	5.37E-03	345	345	6.59E-03
	Group 2	4.66	0.02	0.17	1,031	3.29E-02	1.07E-02	1,036	1,035	0.03
	Group 3	1.47	8.72E-03	0.08	498	2.18E-02	6.51E-03	502	501	0.01
	Group 4	2.34	0.01	0.09	516	2.26E-02	6.78E-03	519	518	0.01
	Group 5	7.57	0.02	0.18	1,166	3.43E-02	1.19E-02	1,172	1,170	0.03
	Group 6	1.12	6.35E-03	0.06	318	1.86E-02	5.37E-03	321	320	6.21E-03
	Group 7	1.50	7.25E-03	0.07	388	2.08E-02	5.81E-03	391	390	0.07
	Group 8	2.19	8.53E-03	0.08	453	2.09E-02	6.31E-03	456	455	0.01
	Construction Total	**23.11**	**0.09**	**0.80**	**4,712**	**0.18**	**0.06**	**4,743**	**4,734**	**0.19**

Operational Emissions Summary (U.S. Tons Annual)

	ROW Group	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-Year GWP CO_2e	100-Year GWP CO_2e	HAPS
Operational	Pipeline	0.02	4.42E-03	0.03	117	5.60E-03	7.70E-04	117	117	2.32E-04
	Pump Station (each)				17			17	17	
	Wellheads (each)				56			56	56	
	Monitoring	0.01	3.86E-03	0.02	7,515	2.43E-03	6.76E-04	7,515	7,515	1.85E-04

Emissions Summary (U.S. Tons Total per Project Year)

Construction Phase	Project Year	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-Year GWP CO_2e	100-Year GWP CO_2e	HAPS	CO_2e Sequestered	20-Year GWP NET CO_2e	20-Year GWP Cumulative Net CO_2e	100-Year GWP NET CO_2e	100-Year GWP Cumulative Net CO_2e
Start year	Year 1[a]	**2.27**	5.44E-03	0.05	343	7.53E-03	5.37E-03	345	345	6.59E-03	0	345	345	345	345
Pipeline is operational	Year 2[b,c]	**4.68**	0.03	0.19	1,203	0.04	0.01	1,210	1,208	0.03	500,000	-498,790	-498,445	-498,792	-498,448
	Year 3[d]	**1.48**	0.01	0.11	631	0.03	7.28E-03	636	634	0.01	1,500,000	-1,499,364	-1,997,810	-1,499,366	-1,997,814
	Year 4	**2.35**	0.01	0.12	929	0.03	7.55E-03	933	932	0.01	2,500,000	-2,499,067	-4,496,877	-2,499,068	-4,496,882
	Year 5	**7.58**	0.03	0.21	1,691	0.04	0.01	1,697	1,695	0.03	3,500,000	-3,498,303	-7,995,179	-3,498,305	-7,995,187
	Year 6[e]	**1.14**	0.01	0.09	971	0.02	6.14E-03	975	973	6.45E-03	4,500,000	-4,499,025	-12,494,205	-4,499,027	-12,494,213
	Year 7	**2.06**	0.57	0.63	389	0.58	0.57	392	391	7.35E-02	5,500,000	-5,499,608	-17,993,813	-5,499,609	-17,993,822
	Year 8[f]	**2.75**	0.57	0.64	454	0.58	0.57	457	456	1.07E-02	6,500,000	-6,499,543	-24,493,356	-6,499,544	-24,493,367
	Year 9[g]	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-31,992,382	-7,499,027	-31,992,394
	Year 10	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-39,491,409	-7,499,027	-39,491,421
	Year 11	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-46,990,436	-7,499,027	-46,990,448
	Year 12	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-54,489,463	-7,499,027	-54,489,475
	Year 13	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-61,988,490	-7,499,027	-61,988,502
	Year 14	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-69,487,517	-7,499,027	-69,487,530
	Year 15	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-76,986,544	-7,499,027	-76,986,557
	Year 16	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-84,485,571	-7,499,027	-84,485,584
	Year 17	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-91,984,597	-7,499,027	-91,984,611
	Year 18	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-99,483,624	-7,499,027	-99,483,638
	Year 19	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-106,982,651	-7,499,027	-106,982,665
	Year 20	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-114,481,678	-7,499,027	-114,481,693
	Year 21	**0.02**	4.42E-03	0.03	972	5.60E-03	7.70E-04	973	973	2.32E-04	7,500,000	-7,499,027	-121,980,705	-7,499,027	-121,980,720
	Year 22[h]	**0.02**	4.42E-03	0.03	917	5.60E-03	7.70E-04	917	917	2.32E-04	7,000,000	-6,999,083	-128,979,788	-6,999,083	-128,979,803
	Year 23	**0.02**	4.42E-03	0.03	788	5.60E-03	7.70E-04	789	788	2.32E-04	6,000,000	-5,999,211	-134,978,999	-5,999,212	-134,979,014
	Year 24	**0.02**	4.42E-03	0.03	693	5.60E-03	7.70E-04	693	693	2.32E-04	5,000,000	-4,999,307	-139,978,306	-4,999,307	-139,978,321
	Year 25	**0.02**	4.42E-03	0.03	581	5.60E-03	7.70E-04	581	581	2.32E-04	4,000,000	-3,999,419	-143,977,724	-3,999,419	-143,977,740
	Year 26	**0.02**	4.42E-03	0.03	469	5.60E-03	7.70E-04	470	469	2.32E-04	3,000,000	-2,999,530	-146,977,255	-2,999,531	-146,977,271
	Year 27	**0.02**	4.42E-03	0.03	357	5.60E-03	7.70E-04	358	357	2.32E-04	2,000,000	-1,999,642	-148,976,897	-1,999,643	-148,976,913
	Year 28[j]	**0.02**	4.42E-03	0.03	245	5.60E-03	7.70E-04	246	245	2.32E-04	1,000,000	-999,754	-149,976,651	-999,755	-149,976,668
Monitoring	Monitoring (Annual)[i]	**0.01**	3.86E-03	0.02	7,515	2.43E-03	6.76E-04	7,515	7,515	1.85E-04	0	7,515	-149,969,136	7,515	-149,969,153

[a] IPCC Sixth Assessment Report 100-year Global Warming Potential Values. 20-year GWP values are available in Appendix E

[b] Proposed Project start year. Group 1 construction emissions are the only emissions considered.

[c] Pipeline is assumed to become operational.

[d] The first wellhead (well 3) is assumed to become operational. Year 2 CO_2e is calculated as Group 2 construction emissions + operational emissions from the pipeline and wellhead. The tons CO_2e sequestered is then subtracted out to present a net value.

[e] Pump Station 1 assumed to become operational. Years 3-5 are calculated as the respective construction group + operation emissions from the pipeline, (1) Pump Station, and wellheads.

[f] Pump Station 2 assumed to become operational. Years 6-8 are calculated as the respective construction group + operational emissions from the pipeline, (2) pump stations, and wellheads.

[g] Year 8 is calculated as Constu presented as the final year with construction emissions based on the assumption that Construction Groups 1-8 will each take one year to complete.

[h] Years 9 through 28 show only expected operational emissions based on the pipeline, pump stations, and wellheads.

[i] Well 3 (the first operational well) decommissions. Years 23-28 will see a reduction in operational wells by a multiple of two for each additional year.

[j] Year 28 is the assumed last year of injection based on 150 million tons of CO_2 being sequestered in total.

Denbury Snowy River CO2 Project Emissions
Construction Groups and Equipment Summary

Construction Groups and Expected Construction Activites

ROW Group	Project Element	Calculations Spreadsheet	Amount	Units
Group 1	Injection Well 03 Construction Pad	Well Pad Construction	4.60	Acres
	BLM Two-Track Injection Well 03	Road Construction	3.36	Miles
	Lone Tree Road Existing	Road Construction	6.68	Miles
Group 2	Bulkline 1 Injection Wells 03 04 05	Flow/Bulk Line Construction	3.76	Miles
	Bulkline 1A Injection Wells 01 02 06 07	Flow/Bulk Line Construction	6.49	Miles
	New Road – Existing Pipeline Corridor	Road Construction	2.08	Miles
	Pump Station North	Pump Station Construction	5.00	Acres
	Pump Station North New Road	Road Construction	0.25	Miles
	Flowline Injection Well 03	Flow/Bulk Line Construction	0.60	Miles
	Injection Well 02 Construction Pad	Well Pad Construction	4.60	Acres
	Injection Well 01 Construction Pad	Well Pad Construction	4.60	Acres
	Flowline Injection Well 02	Flow/Bulk Line Construction	0.44	Miles
	Flowline Injection Well 01	Flow/Bulk Line Construction	1.44	Miles
	BLM Two-Track Injection Well 01	Road Construction	1.39	Miles
	New Road Injection Well 02	Road Construction	0.39	Miles
	New Road Injection Well 01	Road Construction	0.03	Miles
Group 3	Injection Well 06 Construction Pad	Well Pad Construction	4.60	Acres
	Injection Well 07 Construction Pad	Well Pad Construction	4.60	Acres
	Flowline Injection Well 07	Flow/Bulk Line Construction	2.25	Miles
	BLM Two-Track Injection Well 06	Road Construction	4.14	Miles
	BLM Two-Track Injection Well 07	Road Construction	3.22	Miles
	New Road Injection Well 06	Road Construction	0.78	Miles
	New Road Injection Well 07	Road Construction	0.03	Miles
Group4	Injection Well 04 Construction Pad	Well Pad Construction	4.60	Acres
	Injection Well 05 Construction Pad	Well Pad Construction	4.60	Acres
	Flowline Injection Well 04	Flow/Bulk Line Construction	3.60	Miles
	Flowline Injection Well 05	Flow/Bulk Line Construction	0.77	Miles
	BLM Two-Track Injection Well 04	Road Construction	3.56	Miles
	BLM Two-Track Injection Well 05	Road Construction	0.73	Miles
	New Road Injection Well 04	Road Construction	0.03	Miles
	New Road Injection Well 05	Road Construction	0.05	Miles
Group 5	Injection Well 10 Construction Pad	Well Pad Construction	4.60	Acres
	Injection Well 11 Construction Pad	Well Pad Construction	4.60	Acres
	Pump Station South	Pump Station Construction	5.00	Acres
	Flowline Injection Well 10	Flow/Bulk Line Construction	0.06	Miles
	Flowline Injection Well 11	Flow/Bulk Line Construction	2.37	Miles
	Bulkline 2 Injection Wells 08 09 10 11 12 13 14 15	Flow/Bulk Line Construction	13.49	Miles
	BLM Two-Track Injection Well 10	Road Construction	2.66	Miles
	BLM Two-Track Injection Well 11	Road Construction	2.11	Miles
	New Road Injection Well 10	Road Construction	0.07	Miles
	New Road Injection Well 11	Road Construction	0.16	Miles
	Ridge Road Existing Gravel Road on BLM	Road Construction	14.90	Miles
	Ridge Road Existing Gravel Road to Hammond Road	Road Construction	0.00	Miles
	Hammond Road Existing Gravel to Highway 323	Road Construction	3.09	Miles
Group 6	Injection Well 09 Construction Pad	Well Pad Construction	4.60	Acres
	Injection Well 14 Construction Pad	Well Pad Construction	4.60	Acres
	Flowline Injection Well 09	Flow/Bulk Line Construction	0.09	Miles
	Flowline Injection Well 14	Flow/Bulk Line Construction	0.09	Miles
	New Road Injection Well 09	Road Construction	0.10	Miles
	New Road Injection Well 14	Road Construction	0.10	Miles
Group 7	Injection Well 08 Construction Pad	Well Pad Construction	4.60	Acres
	Injection Well 15 Construction Pad	Well Pad Construction	4.60	Acres
	Flowline Injection Well 08	Flow/Bulk Line Construction	0.61	Miles
	Flowline Injection Well 15	Flow/Bulk Line Construction	0.96	Miles
	BLM Two-Track Injection Well 15	Road Construction	0.84	Miles
	New Road Injection Well 08	Road Construction	0.60	Miles
	New Road Injection Well 15	Road Construction	0.12	Miles
Group 8	Injection Well 13 Construction Pad	Well Pad Construction	4.60	Acres
	Injection Well 12 Construction Pad	Well Pad Construction	4.60	Acres
	Flowline Injection Well 12 and 13	Flow/Bulk Line Construction	2.57	Miles
	BLM Two-Track Injection Well 13	Road Construction	2.87	Miles
	BLM Two-Track Injection Well 12	Road Construction	2.50	Miles
	New Road Injection Well 13	Road Construction	0.06	Miles
	New Road Injection Well 12	Road Construction	0.04	Miles
Group 9	NO EXPECTED CONSTRUCTION ACTIVITIES			

Expected Equipment List

Equipment Type	Estimated Number of Each Equipment Type per Group							
	Group 1	Group 2	Group 3	Group 4	Group 5	Group 6	Group 7	Group 8
Air Compressor	1	4	3	3	4	3	3	3
Air Compressor/Dryer	0	2	2	2	2	2	2	2
Backhoe	1	9	8	8	9	8	8	8
Blade	10	16	12	12	16	12	12	12
Blade	0	8	8	8	8	8	8	8
Crane	1	2	1	1	2	1	1	1
RT Crane	0	2	2	2	2	2	2	2
Dozer	12	30	24	24	30	24	24	24
Dump Truck	8	8	8	8	8	8	8	8
Excavator	2	18	17	17	18	17	17	17
Excavator w/ Vacculift	0	2	2	2	2	2	2	2
Farm Tractor	0	4	4	4	4	4	4	4
Forklift	1	2	1	1	2	1	1	1
RT Forklift	0	6	6	6	6	6	6	6
Generator	7	17	14	14	17	14	14	14
Generator	0	5	5	5	5	5	5	5
Loader	0	0	0	0	0	0	0	0
Manlift	0	0	0	0	0	0	0	0
Paint Truck	0	2	2	2	2	2	2	2
Roller	0	2	2	2	2	2	2	2
Roller Compactor	1	1	1	1	1	1	1	1
Scraper	12	18	12	12	18	12	12	12
Sideboom	0	10	10	10	10	10	10	10
Skid Truck	0	4	4	4	4	4	4	4
Tack Rig	0	2	2	2	2	2	2	2
Trencher	1	5	4	4	5	4	4	4
Water Pump	0	0	0	0	0	0	0	0
Water Truck	0	10	10	10	10	10	10	10
Welding Machine	0	14	14	14	14	14	14	14
Welding Truck	0	10	10	10	10	10	10	10
X-Ray Truck	0	4	4	4	4	4	4	4

Denbury Snowy River CO2 Project Emissions Calculation Assumptions and Methodology

General Assumptions:

[1] Acreage and sizes of each well are the same.
[2] All equipment needs are the same for each project element of the same type.
[3] The Pump Stations are electric and have no quantifiable operational emissions
[4] Years of construction are 2026-2035. Actual construction schedule is not finalized at the time of this analysis.
Assume all equipment is purchased in 2026.
Non-Road Moves 4.0.0 utilized for construction equipment emission factors.
[5] Assume construction days are 12 hours.
[6] Construction activities will occur 7 days a week if necessary.
[7] Construction will occur between **July 16 and November 30th** of each year.
[8] Assume 100 miles round trip for a conservative commuting estimate.
Denbury field office in Baker to Ekalaka is 37 miles which was rounded to a 50 mile one way trip for conservativeness.
[9] Operating Emissions are commuting, fugitive loss from pipelines, and any leak rate from the wellhead and or storage.
[10] A **total** of 150 megatons of CO2 will be stored by all wells.
[11] Each well operates 20 years from the wells start up year.
[12] Monitoring will occur for 50 years after the final well ceases operation in alignment with EPA requirements.

Emission Factors:

[1] **Non-Road Moves 4.0.0** utilized for construction equipment emission factors. Ran 9/19/23.
[2] Transportation Emissions were sources from the following:
(a) Updated Emission Factors of Air Pollutants from Vehicle Operations in GREET using MOVES (Sept 2013). Table A6 & Table A22. Accessed 9/25/23
(b) Table 1 EPA Final Industry Fleet Wide CO2 Compliance Targets - Light Duty Trucks 2026: Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards 40 CFR 86 / 40 CFR 600 accessed 9/22/23 at https://www.federalregister.gov/d/2021-27854
(c) 40 CFR Part 98
[3] Global Warming Potentials as cited in Intergovernmental Panel on Climate Change Sixth Assessment Report Chapter 7

20-year GWP Values	
CO_2	1
CH_4	82.5
N_2O	273

100-year GWP Values	
CO_2	1
CH_4	29.8
N_2O	273

Transportation Calculations:

Commuting (light duty trucks):
Assumptions:
[1] assume 1 round trip per day per operator.
[2] The number of operators assumed to be equal to the number of equipment for that construction activity.
[3] If a construction activity is not predicted to take greater than 1 day the amount of round trips remains 1.

Equation: *# of Personnel x 1 Round Trip x Max of 1 or # of days on site x Miles per Round Trip x Emission Factor (g/mile)*

Equipment Mobilization (heavy duty trucks)
Assumptions:
[1] Each piece of equipment will require 2 round trips: one for delivering to the site and one for returning form the site.
[2] Each piece of equipment only needs to be delivered to the site once.

Equation: *# of Equipment x 2 Round Trips X Miles per Roundtrip X Emission Factor (g/mile)*

Denbury Snowy River CO2 Project Emissions
Calculation Assumptions and Methodology

Fugitive Road Emissions:

Assumptions:
[1] Commuting Light Duty trucks for the purpose of this analysis were assumed to be the equivalent of a 1/2 Ton Truck.
[2] Mobilization equipment referred to as "Heavy-Duty Trucks" in calculations are assumed to be Tractor-Trailers.

Paved Roads Fugitive PM Emissions

Includes Commuting and Equipment Mobilization activities from:
(1) Well Pad Construction
(2) Flow / Bulk Line Construction
(3) Pump Station Construction
(4) Road Construction Subcategories : Existing Road and Two Tracks

Paved Roads emission factor from AP-42, Section 13.2.1: *Paved Roads* (01/11)

$$E = k(sL)^{0.91}(W)^{1.02}(1-P/(4*365))$$

where:

sL =	0.6	road surface silt loading silt loading (g/m2) [Table 13.2.1-2, for Ubiquitous Baseline, <500]
W_{LDT} =	4	tons [Average vehicle weight 1/2 Ton Truck]
$W_{Tractor}$ =	25	tons [Average vehicle weight Tractor Trailer]
k =	0.0022	lb/VMT [Table 13.2.1-1, for PM_{10}]
k =	0.00054	lb/VMT [Table 13.2.1-1, for $PM_{2.5}$]
P =	100	days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.1-2]

Example Calculations: Well Pad Construction

VMT (commuter)= (Duration, days) * (VMT per day) * (Quantity, vehicles/day)
VMT (commuter)= (120.52 days) * (100 VMT per day) * (22 vehicles)
VMT (commuter)= 265,144 VMT

PM10= (VMT total for Well Pad Construction) * (Emission Factor, lb/VMT) * (1 ton/2000 lb)
PM10= ((269,344 VMT) * (0.00529 lb/VMT) * (1 ton/2000 lb))
PM10= 0.8 tons

Denbury Snowy River CO2 Project Emissions
Calculation Assumptions and Methodology

Unpaved Roads Fugitive PM Emissions

Assumes that there are two time periods of road usage for construction equipment utilization and commuter use that do not overlap.

Includes Commuting and Equipment Mobilization activities from:
(1) New Roads

Unpaved Roads emission factor from AP-42, Section 13.2.2: *Unpaved Roads* (11/06); Equations a1 and 2

$$E = k\,(s/12)^a (W/3)^b \qquad (1a)$$

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight

Table 13.2.2-2 - Constants for Equation 1a

Constant	PM2.5	PM10
k (lb/VMT)	0.15	1.5
a	0.9	0.9
b	0.45	0.45

Surface Silt (s) content based on Table 13.2.2-1 - construction sites
s = 8.50

$$E_{ext} = E\,[(365 - P)/365] \qquad (2)$$

E_{ext} = annual size-specific emisison factor extrapolated for natural mitigation, lb/VMT
E = emisison factor from Equation 1a
P = days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.2-1
P = 100

1/11 Miscellaneous Sources 13.2.1.2

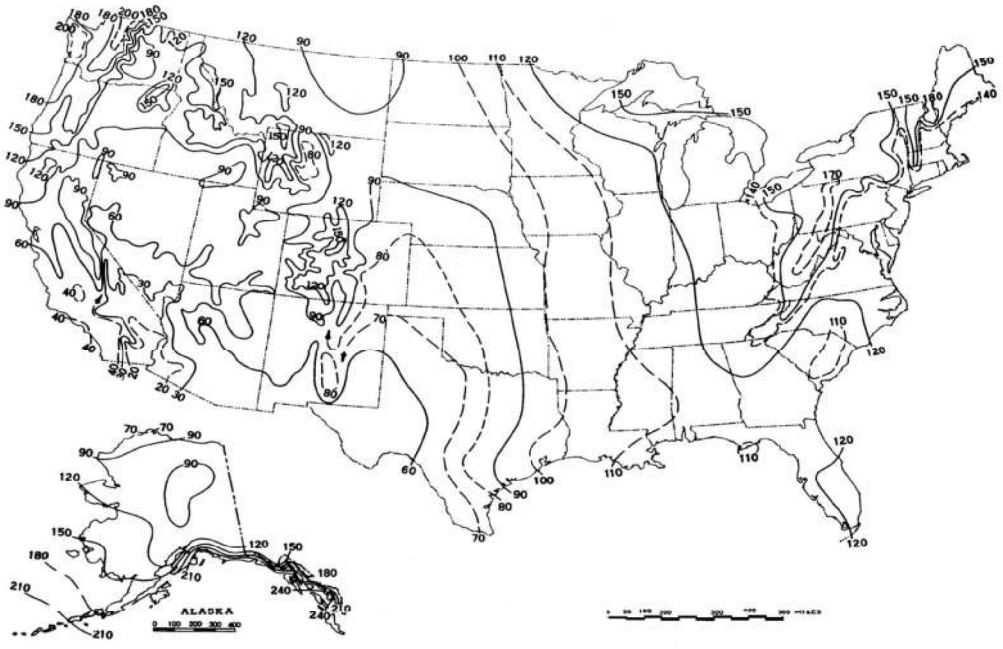


Figure 13.2.1-2. Mean number of days with 0.01 inch or more of precipitation in the United States.

Denbury Snowy River CO2 Project Emissions
Operational Emissions Calculation

Summary of Operation Activity Emissions

Criteria Pollutants	lbs	U.S. tons
CO	1,123	0.56
NOx	136.96	0.07
PM10	32.16	0.02
PM2.5	32.16	0.02
SO2	8.84	4.42E-03
VOC	57.84	0.03
HAPS	0.46	2.32E-04

GHGs	lbs	U.S. tons
CO2	233,307	116.65
CH4	11.21	5.60E-03
N2O	1.54	7.70E-04
20-year CO2e	234,652	117.33
100-year CO2e	234,061	117.03

Summary of Pump Station Operation Activity Emissions (each)

Criteria Pollutants	lbs	U.S. tons
CO		
NOx		
PM10		
PM2.5		
SO2		
VOC		
HAPS		

GHGs	lbs	U.S. tons
CO2	33,105	16.55
CH4		
N2O		
20-year CO2e	33,105	16.55
100-year CO2e	33,105	16.55

Summary of Wellhead Operation Activity Emissions (each)

Criteria Pollutants	lbs	U.S. tons
CO		
NOx		
PM10		
PM2.5		
SO2		
VOC		
HAPS		

GHGs	lbs	U.S. tons
CO2	111,900	55.95
CH4		
N2O		
20-year CO2e	111,900	55.95
100-year CO2e	111,900	55.95

Summary of Monitoring Activity Emissions

Criteria Pollutants	lbs	U.S. tons
CO	983.46	0.49
NOx	68.22	0.03
PM10	27.03	0.01
PM2.5	22.13	0.01
SO2	7.72	3.86E-03
VOC	46.90	0.02
HAPS	0.37	1.85E-04

GHGs	lbs	U.S. tons
CO2	15,030,095	7,515
CH4	4.86	2.43E-03
N2O	1.35	6.76E-04
20-year CO2e	15,030,865	7,515
100-year CO2e	15,030,609	7,515

Denbury Snowy River CO2 Project Emissions
Operational Emissions Calculation

Operational Traffic

Active Sequestration

ANNUAL Commuter Traffic Drill Pads - Sequestion (20 Years)					CO			NOx			PM10		
Equipment Type	Activity	# of personnel	# of Round Trips per Year	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	1.00	365.00	100.00	6.11	223,044	491.73	0.42	15,472	34.11	0.17	6,129	13.51
Heavy Duty Truck	Move equipment												
Heavy Duty Truck	Deliver materials												

ANNUAL Commuter Traffic to Pipelines -Sequestration (20 Years)					CO			NOx			PM10		
Equipment Type	Activity	# of personnel	# of Round Trips per Year	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	1.00	200.00	200.00	6.11	244,432	538.88	0.42	16,956	37.38	0.17	6,717	14.81
Heavy Duty Truck	Move equipment	1.00	18.00	200.00	1.65	5,944	13.10	4.58	16,495	36.36	0.14	521.17	1.15
Heavy Duty Truck	Deliver materials	1.00	12.00	200.00	1.65	3,963	8.74	4.58	10,997	24.24	0.14	347.45	0.77

ANNUAL Commuter Traffic to Pump Stations -Sequestration (20 Years)					CO			NOx			PM10		
Equipment Type	Activity	# of personnel	# of Round Trips per Year	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	1.00	52.00	100.00	6.11	31,776	70.05	0.42	2,204	4.86	0.17	873.24	1.93
Heavy Duty Truck	Move equipment												
Heavy Duty Truck	Deliver materials												

Monitoring

ANNUAL Commuter Traffic Drill Pads - (Well Monitoring 50 Years)					CO			NOx			PM10		
Equipment Type	Activity	# of personnel	# of Round Trips per Year	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	1.00	365.00	100.00	6.11	223,044	491.73	0.42	15,472	34.11	0.17	6,129	13.51
Heavy Duty Truck	Move equipment												
Heavy Duty Truck	Deliver materials												

ANNUAL Commuter Traffic to Pump Stations -Well Monitoring (50 Years)					CO			NOx			PM10		
Equipment Type	Activity	# of personnel	# of Round Trips per Year	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	1.00	365.00	100.00	6.11	223,044	491.73	0.42	15,472	34.11	0.17	6,129	13.51
Heavy Duty Truck	Move equipment												
Heavy Duty Truck	Deliver materials												

Denbury Snowy River CO2 Project Emissions
Operational Emissions Calculation

Operational Traffic

Active Sequestration

ANNUAL Commuter Traffic Drill Pads - Sequestion (20		PM2.5			SO2			VOC			CO2		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.14	5,020	11.07	0.05	1,752	3.86	0.29	10,636	23.45	187.00	6,825,500	15,048
Heavy Duty Truck	Move equipment												
Heavy Duty Truck	Deliver materials												

ANNUAL Commuter Traffic to Pipelines -Sequestratio		PM2.5			SO2			VOC			CO2		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.14	5,501	12.13	0.05	1,920	4.23	0.29	11,656	25.70	187.00	7,480,000	16,491
Heavy Duty Truck	Move equipment	0.09	309.02	0.68	0.01	53.64	0.12	0.41	1,458	3.22	217.46	782,844	1,726
Heavy Duty Truck	Deliver materials	0.09	206.02	0.45	0.01	35.76	0.08	0.41	972.24	2.14	217.46	521,896	1,151

ANNUAL Commuter Traffic to Pump Stations -Sequestration (20		PM2.5			SO2			VOC			CO2		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.14	715.16	1.58	0.05	249.60	0.55	0.29	1,515	3.34	187.00	972,400	2,144
Heavy Duty Truck	Move equipment												
Heavy Duty Truck	Deliver materials												

Monitoring

ANNUAL Commuter Traffic Drill Pads - (Well Monitoring 50 Year		PM2.5			SO2			VOC			CO2		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.14	5,020	11.07	0.05	1,752	3.86	0.29	10,636	23.45	187.00	6,825,500	15,048
Heavy Duty Truck	Move equipment												
Heavy Duty Truck	Deliver materials												

ANNUAL Commuter Traffic to Pump Stations -Well Monitoring (		PM2.5			SO2			VOC			CO2		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.14	5,020	11.07	0.05	1,752	3.86	0.29	10,636	23.45	187.00	6,825,500	15,048
Heavy Duty Truck	Move equipment												
Heavy Duty Truck	Deliver materials												

Denbury Snowy River CO2 Project Emissions
Operational Emissions Calculation

Operational Traffic

Active Sequestration

ANNUAL Commuter Traffic Drill Pads - Sequestion (20		CH4			N2O			HAPS		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.03	1,029	2.27	8.40E-03	306.60	0.68	2.30E-03	84.11	0.19
Heavy Duty Truck	Move equipment									
Heavy Duty Truck	Deliver materials									

ANNUAL Commuter Traffic to Pipelines -Sequestratio		CH4			N2O			HAPS		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.03	1,128	2.49	8.40E-03	336.00	0.74	2.30E-03	92.17	0.20
Heavy Duty Truck	Move equipment	0.46	1,668	3.68	2.00E-03	7.20	0.02	3.77E-03	13.59	0.03
Heavy Duty Truck	Deliver materials	0.46	1,112	2.45	2.00E-03	4.80	0.01	3.77E-03	9.06	0.02

ANNUAL Commuter Traffic to Pump Stations -Sequestration (20		CH4			N2O			HAPS		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.03	146.64	0.32	8.40E-03	43.68	0.10	2.30E-03	11.98	0.03
Heavy Duty Truck	Move equipment									
Heavy Duty Truck	Deliver materials									

Monitoring

ANNUAL Commuter Traffic Drill Pads - (Well Monitoring 50 Year		CH4			N2O			HAPS		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.03	1,029	2.27	8.40E-03	306.60	0.68	2.30E-03	84.11	0.19
Heavy Duty Truck	Move equipment									
Heavy Duty Truck	Deliver materials									

ANNUAL Commuter Traffic to Pump Stations -Well Monitoring (		CH4			N2O			HAPS		
Equipment Type	Activity	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Light Duty Truck	Employee traffic	0.03	1,029	2.27	8.40E-03	306.60	0.68	2.30E-03	84.11	0.19
Heavy Duty Truck	Move equipment									
Heavy Duty Truck	Deliver materials									

Denbury Snowy River CO2 Project Emissions
Operational Emissions Calculation

Operational Emissions

Emissions Source	loss rate annual (CO_2)	Units	Source
Pipeline	1.40E-03	Gg per km of pipeline	2006 IPCC Guidelines for National Greenhouse Gas Inventories Chapter 5: Carbon Dioxide Transport,
Underground Storage	0.5%	over 100 years	NETL's Gate-to-Grave Life Cycle Analysis Model of Saline Aquifer Sequestration of Carbon Dioxide Published 11-30-2013 accessed 8/31/2023
Valves	4.90	scf/hour/component	Leaker Emission Factos - All Compnents, Gas Service. Table W-1E to Subpart W of Part 98, Title 40, in accordance with 40 CFR 98.445(e) assuming survey methods 98.234(a)(1-6) for conservativeness.
Connectors	1.30	scf/hour/component	
Open-ended Lines	2.80	scf/hour/component	

Pump Station Maintenance	**ANNUAL Pump Station Fugitives* (each)**		
		14.96	metric tons per year
	Emissions	32,982	lbs per year
	ANNUAL Pump Station Venting (each)		
		0.06	metric tons per year
	Emissions	122.72	lbs per year

*leaks due to valves, flanges, connectors, and PRV located at the pump station

Active Sequestration	**ANNUAL CO2 Pipeline Fugitives**		
	Total Pipeline Distance	39.61	miles
		63.75	km
	Emission Factor	1.40E-03	Gg per km pipeline
		0.09	Gg
	Emissions	196,749	lbs/year

Monitoring	**ANNUAL Underground Storage Fugitives**		
	Total CO2 Injected	150.00	million tons
		7.50E-03	million tons per year
	Emissions	15,000,000	lbs per year

Well Head [1] Fugitive Emissions (each)	Component	Amount[2]	CO_2 (lbs/hour)
	Valves	11.00	58,274
	Connectors	36.00	50,598
	Open-ended Lines	1.00	3,027
	Total		111,900

[1]Calculated in accordance with 40 CFR 98.445(e)

[2]Table W-1B to Subpart W of Part 98, Title 40, Western U.S. as identified in Table W-1C.

Conversion Factors			
CO_2 gas density at STP	1.98	kg/m^3	<i>Table 3.2. Useful Properties of Some
1 m^3	35.31	cubic feet	https://apps.cer-
1 kg	2.20	lbs	

Denbury Snowy River CO2 Project Emisions

CO2 Sequestration Overview

Overview			Well 03				Wells 01 and 02			
Year	CO2 Sequestered Annual (Million Tons)	CO2 Sequestered Total (Million Tons)	Well(s)	Operation Year	Annual CO2 Sequestered	Total CO2 Sequestered	Well(s)	Operation Year	Annual CO2 Sequestered	Total CO2 Sequestered
1	0.00	0.00								
2	0.50	0.50	Well 03	Year 1	0.50	0.50				
3	1.50	2.00		Year 2	0.50	1.00	Wells 01 and 02	Year 1	1.00	1.00
4	2.50	4.50		Year 3	0.50	1.50		Year 2	1.00	2.00
5	3.50	8.00		Year 4	0.50	2.00		Year 3	1.00	3.00
6	4.50	12.50		Year 5	0.50	2.50		Year 4	1.00	4.00
7	5.50	18.00		Year 6	0.50	3.00		Year 5	1.00	5.00
8	6.50	24.50		Year 7	0.50	3.50		Year 6	1.00	6.00
9	7.50	32.00		Year 8	0.50	4.00		Year 7	1.00	7.00
10	7.50	39.50		Year 9	0.50	4.50		Year 8	1.00	8.00
11	7.50	47.00		Year 10	0.50	5.00		Year 9	1.00	9.00
12	7.50	54.50		Year 11	0.50	5.50		Year 10	1.00	10.00
13	7.50	62.00		Year 12	0.50	6.00		Year 11	1.00	11.00
14	7.50	69.50		Year 13	0.50	6.50		Year 12	1.00	12.00
15	7.50	77.00		Year 14	0.50	7.00		Year 13	1.00	13.00
16	7.50	84.50		Year 15	0.50	7.50		Year 14	1.00	14.00
17	7.50	92.00		Year 16	0.50	8.00		Year 15	1.00	15.00
18	7.50	99.50		Year 17	0.50	8.50		Year 16	1.00	16.00
19	7.50	107.00		Year 18	0.50	9.00		Year 17	1.00	17.00
20	7.50	114.50		Year 19	0.50	9.50		Year 18	1.00	18.00
21	7.50	122.00		Year 20	0.50	10.00		Year 19	1.00	19.00
22	7.00	129.00						Year 20	1.00	20.00
23	6.00	135.00								
24	5.00	140.00								
25	4.00	144.00								
26	3.00	147.00								
27	2.00	149.00								
28	1.00	150.00								

Denbury Snowy River CO2 Project Emisions

CO2 Sequestration Overview

	Wells 06 and 07				Wells 04 and 05				Wells 10 and 11			
Year	Well(s)	Operation Year	Annual CO2 Sequestered	Total CO2 Sequestered	Well(s)	Operation Year	Annual CO2 Sequestered	Total CO2 Sequestered	Well(s)	Operation Year	Annual CO2 Sequestered	Total CO2 Sequestered
1												
2												
3												
4	Wells 06 and 07	Year 1	1.00	1.00								
5		Year 2	1.00	2.00	Wells 04 and 05	Year 1	1.00	1.00				
6		Year 3	1.00	3.00		Year 2	1.00	2.00	Wells 10 and 11	Year 1	1.00	1.00
7		Year 4	1.00	4.00		Year 3	1.00	3.00		Year 2	1.00	2.00
8		Year 5	1.00	5.00		Year 4	1.00	4.00		Year 3	1.00	3.00
9		Year 6	1.00	6.00		Year 5	1.00	5.00		Year 4	1.00	4.00
10		Year 7	1.00	7.00		Year 6	1.00	6.00		Year 5	1.00	5.00
11		Year 8	1.00	8.00		Year 7	1.00	7.00		Year 6	1.00	6.00
12		Year 9	1.00	9.00		Year 8	1.00	8.00		Year 7	1.00	7.00
13		Year 10	1.00	10.00		Year 9	1.00	9.00		Year 8	1.00	8.00
14		Year 11	1.00	11.00		Year 10	1.00	10.00		Year 9	1.00	9.00
15		Year 12	1.00	12.00		Year 11	1.00	11.00		Year 10	1.00	10.00
16		Year 13	1.00	13.00		Year 12	1.00	12.00		Year 11	1.00	11.00
17		Year 14	1.00	14.00		Year 13	1.00	13.00		Year 12	1.00	12.00
18		Year 15	1.00	15.00		Year 14	1.00	14.00		Year 13	1.00	13.00
19		Year 16	1.00	16.00		Year 15	1.00	15.00		Year 14	1.00	14.00
20		Year 17	1.00	17.00		Year 16	1.00	16.00		Year 15	1.00	15.00
21		Year 18	1.00	18.00		Year 17	1.00	17.00		Year 16	1.00	16.00
22		Year 19	1.00	19.00		Year 18	1.00	18.00		Year 17	1.00	17.00
23		Year 20	1.00	20.00		Year 19	1.00	19.00		Year 18	1.00	18.00
24						Year 20	1.00	20.00		Year 19	1.00	19.00
25										Year 20	1.00	20.00
26												
27												
28												

Denbury Snowy River CO2 Project Emisions

CO2 Sequestration Overview

	Wells 09 and 14				Wells 08 and 15				Wells 13 and 12			
Year	Well(s)	Operation Year	Annual CO2 Sequestered	Total CO2 Sequestered	Well(s)	Operation Year	Annual CO2 Sequestered	Total CO2 Sequestered	Well(s)	Operation Year	Annual CO2 Sequestered	Total CO2 Sequestered
1												
2												
3												
4												
5												
6												
7	Wells 09 and 14	Year 1	1.00	1.00								
8		Year 2	1.00	2.00	Wells 08 and 15	Year 1	1.00	1.00				
9		Year 3	1.00	3.00		Year 2	1.00	2.00	Wells 13 and 12	Year 1	1.00	1.00
10		Year 4	1.00	4.00		Year 3	1.00	3.00		Year 2	1.00	2.00
11		Year 5	1.00	5.00		Year 4	1.00	4.00		Year 3	1.00	3.00
12		Year 6	1.00	6.00		Year 5	1.00	5.00		Year 4	1.00	4.00
13		Year 7	1.00	7.00		Year 6	1.00	6.00		Year 5	1.00	5.00
14		Year 8	1.00	8.00		Year 7	1.00	7.00		Year 6	1.00	6.00
15		Year 9	1.00	9.00		Year 8	1.00	8.00		Year 7	1.00	7.00
16		Year 10	1.00	10.00		Year 9	1.00	9.00		Year 8	1.00	8.00
17		Year 11	1.00	11.00		Year 10	1.00	10.00		Year 9	1.00	9.00
18		Year 12	1.00	12.00		Year 11	1.00	11.00		Year 10	1.00	10.00
19		Year 13	1.00	13.00		Year 12	1.00	12.00		Year 11	1.00	11.00
20		Year 14	1.00	14.00		Year 13	1.00	13.00		Year 12	1.00	12.00
21		Year 15	1.00	15.00		Year 14	1.00	14.00		Year 13	1.00	13.00
22		Year 16	1.00	16.00		Year 15	1.00	15.00		Year 14	1.00	14.00
23		Year 17	1.00	17.00		Year 16	1.00	16.00		Year 15	1.00	15.00
24		Year 18	1.00	18.00		Year 17	1.00	17.00		Year 16	1.00	16.00
25		Year 19	1.00	19.00		Year 18	1.00	18.00		Year 17	1.00	17.00
26		Year 20	1.00	20.00		Year 19	1.00	19.00		Year 18	1.00	18.00
27						Year 20	1.00	20.00		Year 19	1.00	19.00
28										Year 20	1.00	20.00

Denbury Snowy River CO2 Project Emissions
Construction Group 1 Emissions Summary

Uncontrolled Emissions Summary (U.S. Tons Total)

Category	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-year GWP CO_2e	100- year GWP CO_2e	HAPS
Well Construction	0.63	0.40	0.03	0.03	4.69E-03	0.05	285.16	6.05E-03	4.99E-03	287.02	286.70	5.32E-03
Road Construction	0.09	0.04	4.24E-03	3.70E-03	7.49E-04	6.30E-03	57.83	1.48E-03	3.82E-04	58.05	57.98	1.27E-03
Paved Roads			0.88	0.22								
Unpaved Roads			—	—								
Earthmoving			19.46	4.05								
Uncontrolled Total	0.71	0.45	20.37	4.30	5.44E-03	0.05	342.99	7.53E-03	5.37E-03	345.07	344.68	6.59E-03

Controlled Emissions Summary (U.S. Tons Total)

Category	PM_{10}	$PM_{2.5}$
Well Construction	0.03	0.03
Road Construction	4.24E-03	3.70E-03
Paved Roads	0.88	0.22
Unpaved Roads	—	—
Earthmoving	9.73	2.02
Controlled Total	10.65	2.27

Denbury Snowy River CO2 Project Emissions
Group 1 Wellpad Construction

Total Disturbed Acres 4.60

Activity 1: Drill Pad Clearing										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						3.0	1.0	100.0	6.11	1,833	4.04	0.42	127.17	0.28
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						3.0	2.0	100.0	1.65	990.66	2.18	4.58	2,749	6.06
Construction Equipment	Backhoe														
	Dozer	153.00	2.00	0.20	0.92	11.04				6.06	66.94	0.15	19.27	212.77	0.47
	Excavator	160.00	1.00	0.20	0.92	11.04				5.28	58.33	0.13	17.08	188.61	0.42

Activity 2: Drill Pad Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6.0	1.0	100.0	6.11	16,866	37.18	0.42	1,170	2.58
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						5.0	2.0	100.0	1.65	1,651	3.64	4.58	4,582	10.10
Construction Equipment	Blade	140.00	1.00	0.25	1.15	13.80				6.09	83.99	0.19	19.47	268.68	0.59
	Dozer	153.00	1.00	1.00	4.60	55.20				6.06	334.71	0.74	19.27	1,064	2.35
	Roller Compactor	156.00	1.00	0.25	1.15	13.80				10.67	147.25	0.32	25.19	347.63	0.77
	Scraper	400.00	3.00	1.00	4.60	55.20				43.35	2,393	5.28	102.59	5,663	12.48

Activity 3: Drill Pad Drilling										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						4	1	100	6.11	224,051	493.95	0.42	15,542	34.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment (Drill Rig)	Generator	3,000	4	60	60	720				88.22	63,515	140.03	234.63	168,931	372.43

Activity 4: Drill Pad Construction										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	205,380	452.79	0.42	14,247	31.41
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5.34	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22.17	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7.29	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26.24	12,594	27.77	65.08	31,241	68.87
	Forklift	115.00	1.00	55.00	55.00	660.00				3.94	2,598	5.73	13.47	8,887	19.59
	Generator	25.00	3.00	55.00	55.00	660.00				14.43	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				25.84	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 1 Wellpad Construction

Total Disturbed Acres 4.60

Activity 1: Drill Pad Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	50.38	0.11	0.14	41.26	0.09	0.05	14.40	0.03	0.29	87.42	0.19
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	86.86	0.19	0.09	51.50	0.11	0.01	8.94	0.02	0.41	243.06	0.54
Construction Equipment	Backhoe												
	Dozer	1.45	15.99	0.04	1.40	15.51	0.03	0.11	1.26	2.78E-03	0.96	10.62	0.02
	Excavator	1.24	13.64	0.03	1.20	13.23	0.03	0.12	1.27	2.80E-03	0.85	9.40	0.02

Activity 2: Drill Pad Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	463.49	1.02	0.14	379.58	0.84	0.05	132.48	0.29	0.29	804.26	1.77
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	144.77	0.32	0.09	85.84	0.19	0.01	14.90	0.03	0.41	405.10	0.89
Construction Equipment	Blade	1.45	19.98	0.04	1.40	19.38	0.04	0.12	1.63	3.60E-03	0.97	13.36	0.03
	Dozer	1.45	79.95	0.18	1.40	77.55	0.17	0.11	6.31	0.01	0.96	53.08	0.12
	Roller Compactor	2.72	37.53	0.08	2.64	36.40	0.08	0.11	1.56	3.43E-03	1.67	23.04	0.05
	Scraper	8.06	444.69	0.98	7.81	431.35	0.95	0.37	20.26	0.04	7.34	405.19	0.89

Activity 3: Drill Pad Drilling		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	6,157	13.57	0.14	3,301	7.28	0.05	1,760	3.88	0.29	10,684	23.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment (Drill Rig)	Generator	10.64	7,661	16.89	10.32	7,431	16.38	0.42	302.18	0.67	13.21	9,510	20.97

Activity 4: Drill Pad Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	5,644	12.44	0.14	6,808	15.01	0.05	1,613	3.56	0.29	9,794	21.59
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Forklift	0.88	578.98	1.28	0.85	561.61	1.24	0.11	74.64	0.16	0.66	432.85	0.95
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66	1,754	3.87	0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 1 Wellpad Construction

Total Disturbed Acres 4.60

Activity 1: Drill Pad Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	56,100	123.68	0.03	8.46	0.02	8.40E-03	2.52	5.56E-03	2.30E-03	0.69	1.52E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	130,474	287.65	0.46	278.04	0.61	2.00E-03	1.20	2.65E-03	3.77E-03	2.26	4.99E-03
Construction Equipment	Backhoe												
	Dozer	43,104	475,869	1,049	0.07	0.83	1.82E-03	0.23	2.58	5.69E-03	1.89	20.87	0.05
	Excavator	43,580	481,119	1,061	0.06	0.71	1.56E-03	0.24	2.70	5.95E-03	0.82	9.07	0.02

Activity 2: Drill Pad Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	516,120	1,138	0.03	77.83	0.17	8.40E-03	23.18	0.05	2.30E-03	6.36	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	217,457	479.41	0.46	463.40	1.02	2.00E-03	2.00	4.41E-03	3.77E-03	3.77	8.32E-03
Construction Equipment	Blade	44,593	615,381	1,357	0.07	1.03	2.28E-03	0.21	2.95	6.50E-03	0.74	10.17	0.02
	Dozer	43,104	2,379,347	5,246	0.07	4.13	0.01	0.23	12.89	0.03	1.89	104.34	0.23
	Roller Compactor	41,867	577,764	1,274	0.13	1.84	4.06E-03	0.24	3.29	7.25E-03	1.19	16.41	0.04
	Scraper	133,797	7,385,609	16,282	0.53	29.29	0.06	0.61	33.71	0.07	3.04	167.94	0.37

Activity 3: Drill Pad Drilling		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,856,318	15,116	0.03	1,034	2.28	8.40E-03	307.98	0.68	2.30E-03	84.48	0.19
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	1.25	2.75E-03
Construction Equipment (Drill Rig)	Generator	148,388	106,839,491	235,541	1.00	722.78	1.59	4.58	3,298	7.27	0.89	639.77	1.41

Activity 4: Drill Pad Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,284,958	13,856	0.03	947.79	2.09	8.40E-03	282.32	0.62	2.30E-03	77.44	0.17
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	1.25	2.75E-03
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89	586.46	1.29
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Forklift	42,947	28,344,784	62,490	0.05	30.16	0.07	0.18	115.87	0.26	0.57	373.49	0.82
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 1 Road Maintenance and Construction

New Roads:

Miles —

Activity 1: Road Clear										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	—	—	0.42	—	—
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	—	—	4.58	—	—
Construction Equipment	Air Compressor/Dryer				—	—									
	Blade	300.00	3.00	2.00	—	—				4.95	—	—	20.71	—	—
	Dozer	400.00	3.00	2.00	—	—				41.39	—	—	98.38	—	—
	Scraper	400.00	3.00	2.00	—	—				43.35	—	—	102.59	—	—

Activity 2: Road Grading										CO			NOx		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	—	—	0.42	—	—
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						12	2	100	1.65	—	—	4.58	—	—
Construction Equipment	Blade	300.00	2.00	2.00	—	—				4.95	—	—	20.71	—	—
	Dozer	400.00	3.00	2.00	—	—				41.39	—	—	98.38	—	—
	Dump Truck	350.00	4.00	2.00	—	—				7.76	—	—	33.63	—	—
	Scraper	400.00	3.00	2.00	—	—				43.35	—	—	102.59	—	—

Two-Tracks Road Modifications:

Miles 3.36

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	49,277	108.64	0.42	3,418	7.54
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Blade	300.00	2.00	2.00	6.72	80.64				4.95	399.16	0.88	20.71	1,670	3.68
	Dozer	400.00	3.00	2.00	6.72	80.64				41.39	3,337	7.36	98.38	7,933	17.49
	Dump Truck	350.00	4.00	2.00	6.72	80.64				7.76	625.91	1.38	33.63	2,712	5.98
	Scraper	400.00	3.00	2.00	6.72	80.64				43.35	3,495	7.71	102.59	8,273	18.24

Existing Roads:

Miles 6.68

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						2	1	100	6.11	16,328	36.00	0.42	1,133	2.50
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04
Construction Equipment	Blade	300.00	2.00	2.00	13.36	160.32				4.95	793.58	1.75	20.71	3,320	7.32

Denbury Snowy River CO2 Project Emissions
Group 1 Road Maintenance and Construction

New Roads:

Miles —

Activity 1: Road Clear			PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**Size (hp)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)		0.17	—	—	0.14	—	—	0.05	—	—	0.29	—	—
	Heavy Duty Truck (Other listed activities)													
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck		0.14	—	—	0.09	—	—	0.01	—	—	0.41	—	—
Construction Equipment	Air Compressor/Dryer													
	Blade	300.00	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—
	Dozer	400.00	7.76	—	—	7.53	—	—	0.37	—	—	7.10	—	—
	Scraper	400.00	8.06	—	—	7.81	—	—	0.37	—	—	7.34	—	—

Activity 2: Road Grading			PM10			PM2.5			SO2			VOC		
Construction Phases	**Equipment**	**Size (hp)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)		0.17	—	—	0.14	—	—	0.05	—	—	0.29	—	—
	Heavy Duty Truck (Other listed activities)													
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck		0.14	—	—	0.09	—	—	0.01	—	—	0.41	—	—
Construction Equipment	Blade	300.00	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—
	Dozer	400.00	7.76	—	—	7.53	—	—	0.37	—	—	7.10	—	—
	Dump Truck	350.00	2.08	—	—	2.01	—	—	0.35	—	—	2.72	—	—
	Scraper	400.00	8.06	—	—	7.81	—	—	0.37	—	—	7.34	—	—

Two-Tracks Road Modifications:

Miles 3.36

Activity 1: Road Grading			PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**Size (hp)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)		0.17	1,354	2.99	0.14	1,109	2.45	0.05	387.07	0.85	0.29	2,350	5.18
	Heavy Duty Truck (Other listed activities)													
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck		0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Blade	300.00	1.30	105.11	0.23	1.26	101.95	0.22	0.19	15.62	0.03	1.65	133.04	0.29
	Dozer	400.00	7.76	626.01	1.38	7.53	607.23	1.34	0.37	29.72	0.07	7.10	572.37	1.26
	Dump Truck	350.00	2.08	167.44	0.37	2.01	162.42	0.36	0.35	28.33	0.06	2.72	219.24	0.48
	Scraper	400.00	8.06	649.64	1.43	7.81	630.15	1.39	0.37	29.60	0.07	7.34	591.93	1.30

Existing Roads:

Miles 6.68

Activity 1: Road Grading			PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**Size (hp)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)		0.17	448.71	0.99	0.14	367.48	0.81	0.05	128.26	0.28	0.29	778.62	1.72
	Heavy Duty Truck (Other listed activities)													
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck		0.14	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36
Construction Equipment	Blade	300.00	1.30	208.96	0.46	1.26	202.69	0.45	0.19	31.06	0.07	1.65	264.49	0.58

Denbury Snowy River CO2 Project Emissions
Group 1 Road Maintenance and Construction

New Roads:

Miles —

Activity 1: Road Clear			CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	Size (hp)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)		187.00	—	—	0.03	—	—	8.40E-03	—	—	2.30E-03	—	—
	Heavy Duty Truck (Other listed activities)													
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck		217.46	—	—	0.46	—	—	2.00E-03	—	—	3.77E-03	—	—
Construction Equipment	Air Compressor/Dryer								—	—	—	—	—	—
	Blade	300.00	73,223	—	—	0.09	—	—	0.46	—	—	0.74	—	—
	Dozer	400.00	134,685	—	—	0.51	—	—	0.61	—	—	1.89	—	—
	Scraper	400.00	133,797	—	—	0.53	—	—	0.61	—	—	3.04	—	—

Activity 2: Road Grading			CO2			CH4			N2O			HAPS		
Construction Phases	Equipment	Size (hp)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)		187.00	—	—	0.03	—	—	8.40E-03	—	—	2.30E-03	—	—
	Heavy Duty Truck (Other listed activities)													
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck		217.46	—	—	0.46	—	—	2.00E-03	—	—	3.77E-03	—	—
Construction Equipment	Blade	300.00	73,223	—	—	0.09	—	—	0.46	—	—	0.74	—	—
	Dozer	400.00	134,685	—	—	0.51	—	—	0.61	—	—	1.89	—	—
	Dump Truck	350.00	132,987	—	—	0.13	—	—	0.53	—	—	6.73	—	—
	Scraper	400.00	133,797	—	—	0.53	—	—	0.61	—	—	3.04	—	—

Two-Tracks Road Modifications:

Miles 3.36

Activity 1: Road Grading			CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	Size (hp)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)		187.00	1,507,968	3,325	0.03	227.40	0.50	8.40E-03	67.74	0.15	2.30E-03	18.58	0.04
	Heavy Duty Truck (Other listed activities)													
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck		217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Blade	300.00	73,223	5,904,702	13,018	0.09	7.10	0.02	0.46	36.93	0.08	0.74	59.41	0.13
	Dozer	400.00	134,685	10,861,008	23,944	0.51	41.06	0.09	0.61	49.24	0.11	1.89	152.43	0.34
	Dump Truck	350.00	132,987	10,724,032	23,642	0.13	10.43	0.02	0.53	43.09	0.09	6.73	542.75	1.20
	Scraper	400.00	133,797	10,789,411	23,787	0.53	42.79	0.09	0.61	49.24	0.11	3.04	245.34	0.54

Existing Roads:

Miles 6.68

Activity 1: Road Grading			CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	Size (hp)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)		187.00	499,664	1,102	0.03	75.35	0.17	8.40E-03	22.44	0.05	2.30E-03	6.16	0.01
	Heavy Duty Truck (Other listed activities)													
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck		217.46	86,983	191.76	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Blade	300.00	73,223	11,739,109	25,880	0.09	14.12	0.03	0.46	73.43	0.16	0.74	118.12	0.26

Denbury Snowy River CO2 Project Emissions
Group 1 Fugitive Dust Emissions from Paved Roads

Summary of Fugitive Emissions

Paved Roads emission factor from AP-42, Section 13.2.1: *Paved Roads* (01/11)

$$E = k(sL)^{0.91}(W)^{1.02}(1-P/(4*365))$$

where:

sL =	0.6	road surface silt loading silt loading (g/m2) [Table 13.2.1-2, for Ubiquitous Baseline, <500]
W_{LDT} =	4	tons [Average vehicle weight]
$W_{Tractor}$ =	25	tons [Average vehicle weight]
k =	0.0022	lb/VMT [Table 13.2.1-1, for PM_{10}]
k =	0.00054	lb/VMT [Table 13.2.1-1, for $PM_{2.5}$]
P =	100	days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.1-2]

1/2 Ton Trucks (light-duty trucks)

$E_{(PM10)}$ = 5.29E-03 lb/VMT

$E_{(PM2.5)}$ = 1.30E-03 lb/VMT

121	Duration of Construction (days)-Well Pad Construction
0	Duration of Construction (days)-Flow/Bulk Line Construction
0	Duration of Construction (days)-Pump Station Construction
20	Duration of Construction (days)-Road Construction (existing and two-track roads)

Tractor Trailers

$E_{(PM10)}$ = 3.43E-02 lb/VMT

$E_{(PM2.5)}$ = 8.43E-03 lb/VMT

2	Equipment Delivery (days) -Well Pad Construction
0	Equipment Delivery (days) -Flow/Bulk Line Construction
0	Equipment Delivery (days) -Pump Station Construction
2	Equipment Delivery (days) -Road Construction (existing and two-track roads)

Project Segment

Equipment Type	Average Vehicle Weight (tons)[a]	Well Pad Construction			Flow/Bulk Line Construction			Pump Station Construction			Road Construction		
		VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]
Light Duty Trucks	4	100	22	265144	100	0	0	100	120	0	100	14	28112
Tractor Trailers	25	100	21	4200	100	0	0	100	0	0	100	10	2000
Total VMT				269344			0			0			30112
a - Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.													
PM10 (tons)				**0.77**			**0.00**			**0.00**			**0.11**
PM2.5 (tons)				**0.19**			**0.00**			**0.00**			**0.03**

Project Totals

Total Paved Road Emissions	
Pollutant	**tons**
PM_{10}	**0.88**
$PM_{2.5}$	**0.22**

[a] *Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.*

[b] VMT per day are projected based on experience from previous construction projects.

[c] Vehicle Miles Traveled (VMT) are based on the vehicle quantity , project duration, and experience from previous construction projects.

Denbury Snowy River CO2 Project Emissions
Group 1 Fugitive Dust Emissions from Unpaved Roads

Summary of Fugitive Emissions

Unpaved Roads emission factor from AP-42, Section 13.2.2: *Unpaved Roads* (11/06); Equations a1 and 2

$$E = k\,(s/12)^a (W/3)^b \qquad (1a)$$

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight

Table 13.2.2-2 - Constants for Equation 1a

Constant	PM2.5	PM10
k (lb/VMT)	0.15	1.5
a	0.9	0.9
b	0.45	0.45

Surface Silt (s) content based on Table 13.2.2-1 - construction sites

s = 8.50

$$E_{ext} = E\,[(365 - P)/365] \qquad (2)$$

E_{ext} = annual size-specific emisison factor extrapolated for natural mitigation, lb/VMT
E = emisison factor from Equation 1a
P = days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.2-1

P = 100

Equipment	Construction Duration (days)	Miles per Day	Quantity	Total Vehicle Miles Traveled[a] (VMT)	W: Mean Vehicle Weight (tons)[b]	Emission Factors (lb/VMT)[c]		Emissions (tons)		Controlled Emissions (tons)	
						PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Well Pad Construction											
Average Fleet Vehicle	0	100	0	0	14.5	1.622	0.162	0.00	0.00	0.0	0.0
							Total (tons)	**0.00**	**0.00**	**0.0**	**0.0**

(a) VMT per day are projected based on experience from previous construction projects
(b) Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.
(c) AP 42 Section 13.2.2 Unpaved Roads, dated November 2006, Equations 1a and 2

Denbury Snowy River CO2 Project Emissions
Group 1 Fugitive Dust Emissions from Earthmoving Activities

Construction Activity	Activity Type	Approximate Pipeline Length or Road Length (mi)	Excavation Volume[a] (ft^3)	Temporary Workspace for Construction (acres)[b]
Injection Well 03 Construction Pad	Well Pad Construction	--	601,128	4.6
BLM Two-Track Injection Well 03	Access Roads	3.36	532,224	12.22
Lone Tree Road Existing	Access Roads	6.68	1,058,112	24.29

Project Construction Activity Particulate Matter Emissions

Construction Activity	Excavation[a] (tons)	Excavation PM_{10} Emission Factor[c] (lb/ton)	Pipeline Excavation PM_{10} Emissions (tons)	Backfilling[a] (tons)	Backfilling PM_{10} Emission Factor[b] (lb/ton)	Backfilling PM10 Emissions (tpy)	Windblown Dust Area (acre)	PM_{10} Windblown Dust Emission Factor[d,e] (tons/acre)	Windblown Dust PM_{10} Emissions - Uncontrolled (tons)	Total Construction Activity PM_{10} emissions (tons)	Total Controlled Construction Activity PM_{10} emissions[g] (tons)	Total Construction Activity $PM_{2.5}$ emissions[f] (tons)	Total Controlled Construction Activity $PM_{2.5}$ emissions[g] (tons)
Injection Well 03 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
BLM Two-Track Injection Well 03	26,611	0.058	0.772	26,611	0.012	0.160	12.2	3.80E-01	4.64	5.574	2.787	1.159	0.580
Lone Tree Road Existing	52,906	0.058	1.534	52,906	0.012	0.317	24.3	3.80E-01	9.23	11.082	5.541	2.305	1.153
									Total	**19.457**	**9.728**	**4.047**	**2.023**

(a) Excavation of well pad sites assumed to be 3 feet deep. Excavation and backfilling assumes pipeline will be 6 ft x 3 ft x approximate length (ft) for the Project component. Excavation for road construction assumes road excavation is 30 ft width x 1 ft deep x approximate road length (ft). Soil density is assumed to be 100 lb/ft^3

(b) Temporary workspace acres for roadways assumed to be 30 ft width x approximate road length (mi).

(c) Excavation and backfilling factors from AP-42, Table 11.9-4 (dated 7/98), assuming 100% of TSP is PM_{10}

(d) Windblown dust factor from AP-42 Table 11.9-4 Uncontroled Particulate Emission Factors for Open Dust Sources

(e) PM_{10} emissions are conservatively assumed to be 100% of TSP.

(f) $PM_{2.5}$ emissions were calculated following the SCAQMD Particulate Matter $PM_{2.5}$ Significance Thresholds and Calculation Methodology (2006). For construction and demolition fugitive dust sources, 20.8% of the PM_{10} would be $PM_{2.5}$

(g) Controls are conservatively assumed to have a 50% reducton factor based on Emission Factors for Paved and Unpaved Roads (1/2015) Utah DEQ

Note: Pipeyards/wareyards are assumed to have negligible particulate emissions because of no construction activities.

Denbury Snowy River CO2 Project Emissions
Construction Group 2 Emissions Summary

Uncontrolled Emissions Summary (U.S. Tons Total)

Category	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-year GWP CO_2e	100- year GWP CO_2e	HAPS
Well Construction	0.65	0.41	0.03	0.03	4.89E-03	0.05	298.91	6.18E-03	5.08E-03	300.81	300.48	5.69E-03
Flow/Bulk Line Construction	1.40	0.47	0.06	0.05	0.01	0.09	449.65	0.02	3.74E-03	452.16	451.21	0.02
Pump Station Construction	0.46	0.23	0.02	0.02	3.65E-03	0.02	200.68	4.50E-03	1.40E-03	201.43	201.20	5.05E-03
Road Construction	0.13	0.08	7.16E-03	6.20E-03	1.10E-03	0.01	81.50	4.05E-03	5.17E-04	81.98	81.76	1.84E-03
Paved Roads			5.70	1.40								
Unpaved Roads			**19.17**	**1.92**								
Earthmoving			21.15	10.58								
Total	2.65	1.20	**46.14**	**13.99**	0.02	0.17	1,030.74	0.03	0.01	1,036.39	1,034.65	0.03

Controlled Emissions Summary (U.S. Tons Total)

Category	PM_{10}	$PM_{2.5}$
Well Construction	0.03	0.03
Flow/Bulk Line Construction	0.06	0.05
Pump Station Construction	0.02	0.02
Road Construction	7.16E-03	6.20E-03
Paved Roads	5.70	1.40
Unpaved Roads	9.58	0.96
Earthmoving	10.58	2.20
Controlled Total	25.98	4.66

Denbury Snowy River CO2 Project Emissions
Group 2 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						3	1	100	6.11	3,373	7.44	0.42	233.99	0.52
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						3	2	100	1.65	990.66	2.18	4.58	2,749	6.06
Construction Equipment	Air Compressor/Dryer														
	Dozer	153.00	2.00	0.20	1.84	22.08				6.06	133.89	0.30	19.27	425.53	0.94
	Excavator	160.00	1.00	0.20	1.84	22.08				5.28	116.67	0.26	17.08	377.21	0.83

Activity 2: Drill Pad Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	33,732	74.37	0.42	2,340	5.16
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						5	2	100	1.65	1,651	3.64	4.58	4,582	10.10
Construction Equipment	Blade	140.00	1.00	0.25	2.30	27.60				6.09	167.98	0.37	19.47	537.36	1.18
	Dozer	153.00	1.00	1.00	9.20	110.40				6.06	669.43	1.48	19.27	2,128	4.69
	Roller Compactor	156.00	1.00	0.25	2.30	27.60				10.67	294.50	0.65	25.19	695.26	1.53
	Scraper	400.00	3.00	1.00	9.20	110.40				43.35	4,785	10.55	102.59	11,326	24.97

Activity 3: Drill Pad Drilling

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						4.00	1	100	6	224,051	493.95	0.42	15,542	34.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4.00	2	100	2	1,321	2.91	4.58	3,666	8.08
Construction Equipment (Drill Rig)	Generator	3,000	4.00	60.00	60.00	720.00				88	63,515	140.03	234.63	168,931	372.43

Activity 4: Drill Pad Construction

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9.00	1	100	6	205,380	452.79	0.42	14,247	31.41
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9.00	2	100	2	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26	12,594	27.77	65.08	31,241	68.87
	Generator	25.00	3.00	55.00	55.00	660.00				14	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				26	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 2 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	92.70	0.20	0.14	75.92	0.17	0.05	26.50	0.06	0.29	160.85	0.35
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	86.86	0.19	0.09	51.50	0.11	0.01	8.94	0.02	0.41	243.06	0.54
Construction Equipment	Air Compressor/Dryer												
	Dozer	1.45	31.98	0.07	1.40	31.02	0.07	0.11	2.52	5.56E-03	0.96	21.23	0.05
	Excavator	1.24	27.28	0.06	1.20	26.46	0.06	0.12	2.54	5.61E-03	0.85	18.80	0.04

Activity 2: Drill Pad Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	926.97	2.04	0.14	759.17	1.67	0.05	264.96	0.58	0.29	1,609	3.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	144.77	0.32	0.09	85.84	0.19	0.01	14.90	0.03	0.41	405.10	0.89
Construction Equipment	Blade	1.45	39.96	0.09	1.40	38.76	0.09	0.12	3.26	7.19E-03	0.97	26.71	0.06
	Dozer	1.45	159.90	0.35	1.40	155.10	0.34	0.11	12.62	0.03	0.96	106.15	0.23
	Roller Compactor	2.72	75.06	0.17	2.64	72.81	0.16	0.11	3.11	6.87E-03	1.67	46.07	0.10
	Scraper	8.06	889.39	1.96	7.81	862.70	1.90	0.37	40.52	0.09	7.34	810.38	1.79

Activity 3: Drill Pad Drilling		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	6,157	13.57	0.14	3,301	7.28	0.05	1,760	3.88	0.29	10,684	23.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment (Drill Rig)	Generator	10.64	7,661	16.89	10.32	7,431	16.38	0.42	302.18	0.67	13.21	9,510	20.97

Activity 4: Drill Pad Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	5,644	12.44	0.14	6,808	15.01	0.05	1,613	3.56	0.29	9,794	21.59
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66			0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 2 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	103,224	227.57	0.03	15.57	0.03	8.40E-03	4.64	0.01	2.30E-03	1.27	2.80E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	130,474	287.65	0.46	278.04	0.61	2.00E-03	1.20	2.65E-03	3.77E-03	2.26	4.99E-03
Construction Equipment	Air Compressor/Dryer												
	Dozer	43,104	951,739	2,098	0.07	1.65	3.64E-03	0.23	5.16	0.01	1.89	41.74	0.09
	Excavator	43,580	962,237	2,121	0.06	1.41	3.11E-03	0.24	5.39	0.01	0.82	18.15	0.04

Activity 2: Drill Pad Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,032,240	2,276	0.03	155.66	0.34	8.40E-03	46.37	0.10	2.30E-03	12.72	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	217,457	479.41	0.46	463.40	1.02	2.00E-03	2.00	4.41E-03	3.77E-03	3.77	8.32E-03
Construction Equipment	Blade	44,593	1,230,761	2,713	0.07	2.06	4.55E-03	0.21	5.90	0.01	0.74	20.33	0.04
	Dozer	43,104	4,758,694	10,491	0.07	8.25	0.02	0.23	25.79	0.06	1.89	208.68	0.46
	Roller Compactor	41,867	1,155,529	2,548	0.13	3.68	8.11E-03	0.24	6.57	0.01	1.19	32.82	0.07
	Scraper	133,797	14,771,217	32,565	0.53	58.58	0.13	0.61	67.42	0.15	3.04	335.88	0.74

Activity 3: Drill Pad Drilling		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,856,318	15,116	0.03	1,034	2.28	8.40E-03	307.98	0.68	2.30E-03	84.48	0.19
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	1.25	2.75E-03
Construction Equipment (Drill Rig)	Generator	148,388	106,839,491	235,541	1.00	722.78	1.59	4.58	3,298	7.27	0.89	639.77	1.41

Activity 4: Drill Pad Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,284,958	13,856	0.03	947.79	2.09	8.40E-03	282.32	0.62	2.30E-03	77.44	0.17
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	1.25	2.75E-03
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89	586.46	1.29
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 2 Flowline Construction

Total Miles **12.74**

Activity 1: Clearing ROW

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						16	1	100	6.11	249,109	549.19	0.42	17,280	38.10	0.17
	Heavy Duty Truck (Other listed activities)															
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						16	2	100	1.65	5,284	11.65	4.58	14,662	32.32	0.14
Construction Equipment	Backhoe				0.00E+00	0.00E+00										
	Blade	260.00	2.0	2.00	25.48	305.74				4.95	1,513	3.34	20.71	6,331	13.96	1.30
	Dozer	240.00	8.0	2.00	25.48	305.74				5.30	1,620	3.57	21.66	6,621	14.60	1.38
	Water Truck	185.00	6.0	2.00	25.48	305.74				2.80	857.50	1.89	16.14	4,935	10.88	0.92

Activity 2: Trenching

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						15	1	100	6.11	116,770	257.43	0.42	8,100	17.86	0.17
	Heavy Duty Truck (Other listed activities)															
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						15	2	100	1.65	4,953	10.92	4.58	13,746	30.30	0.14
Construction Equipment	Backhoe	110.00	1.0	1.00	12.74	152.87				27.40	4,189	9.23	41.31	6,314	13.92	6.46
	Excavator	236.00	11.0	1.00	12.74	152.87				4.15	633.73	1.40	18.73	2,864	6.31	1.16
	Trencher	420.00	3.0	1.00	12.74	152.87				167.78	25,649	56.55	342.02	52,284	115.27	27.66

Activity 3: Stringing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						10	1	100	6.11	77,847	171.62	0.42	5,400	11.91	0.17
	Heavy Duty Truck (Other listed activities)															
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16	0.14
Construction Equipment	Excavator w/ Vacculift	428.00	2.0	1.00	12.74	152.87				26.24	4,011	8.84	65.08	9,950	21.94	5.40
	RT Forklift	65.00	2.0	1.00	12.74	152.87				12.90	1,971	4.35	95.48	14,597	32.18	1.43
	Generator	50.00	2.0	1.00	12.74	152.87				5.34	815.96	1.80	48.26	7,378	16.27	0.40
	Skid Truck	185.00	2.0	1.00	12.74	152.87				2.80	428.75	0.95	16.14	2,467	5.44	0.92
	Water Truck	185.00	2.0	1.00	12.74	152.87				2.80	428.75	0.95	16.14	2,467	5.44	0.92

Activity 4: Welding and Lower In

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						54	1	100	6.11	420,372	926.76	0.42	29,161	64.29	0.17
	Heavy Duty Truck (Other listed activities)															
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						41	2	100	1.65	13,539	29.85	4.58	37,572	82.83	0.14
Construction Equipment	Backhoe	110.00	2.0	1.00	12.74	152.87				27.40	4,189	9.23	41.31	6,314	13.92	6.46
	Blade	200.00	2.0	1.00	12.74	152.87				4.95	756.70	1.67	20.71	3,166	6.98	1.30
	RT Crane	185.00	2.0	1.00	12.74	152.87				7.29	1,115	2.46	27.67	4,229	9.32	1.70
	Dozer	240.00	2.0	1.00	12.74	152.87				5.30	810.11	1.79	21.66	3,310	7.30	1.38
	Excavator	236.00	2.0	1.00	12.74	152.87				4.15	633.73	1.40	18.73	2,864	6.31	1.16
	RT Forklift	65.00	2.0	1.00	12.74	152.87				12.90	1,971	4.35	95.48	14,597	32.18	1.43
	Generator	50.00	2.0	1.00	12.74	152.87				5.34	815.96	1.80	48.26	7,378	16.27	0.40
	Sideboom	305.00	10.0	1.00	12.74	152.87				38.89	5,945	13.11	129.26	19,761	43.56	6.83
	Skid Truck	185.00	2.0	1.00	12.74	152.87				2.80	428.75	0.95	16.14	2,467	5.44	0.92
	Tack Rig	255.00	2.0	1.00	12.74	152.87				5.30	810.11	1.79	21.66	3,310	7.30	1.38
	Water Truck	185.00	2.0	1.00	12.74	152.87				2.80	428.75	0.95	16.14	2,467	5.44	0.92
	Welding Machine	35.00	14.0	1.00	12.74	152.87				5.79	885.18	1.95	51.09	7,810	17.22	0.45
	Welding Truck	300.00	10.0	1.00	12.74	152.87				2.80	428.75	0.95	16.14	2,467	5.44	0.92

Denbury Snowy River CO2 Project Emissions
Group 2 Flowline Construction

Total Miles 12.74

Activity 1: Clearing ROW		PM_{10}		$PM_{2.5}$			SO_2			VOC			CO_2		
Construction Phases	Equipment	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	6,846	15.09	0.14	5,606	12.36	0.05	1,957	4.31	0.29	11,879	26.19	187.00	7,623,134	16,806
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	463.26	1.02	0.09	274.69	0.61	0.01	47.68	0.11	0.41	1,296	2.86	217.46	695,862	1,534
Construction Equipment	Backhoe														
	Blade	398.51	0.88	1.26	386.55	0.85	0.19	59.24	0.13	1.65	504.40	1.11	73,223	22,387,246	49,355
	Dozer	421.33	0.93	1.34	408.69	0.90	0.20	60.37	0.13	1.72	526.15	1.16	74,585	22,803,605	50,273
	Water Truck	282.09	0.62	0.89	273.63	0.60	0.20	62.30	0.14	1.37	419.85	0.93	77,373	23,656,088	52,153

Activity 2: Trenching		PM_{10}		$PM_{2.5}$			SO_2			VOC			CO_2		
Construction Phases	Equipment	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	3,209	7.07	0.14	2,628	5.79	0.05	917.22	2.02	0.29	5,568	12.28	187.00	3,573,344	7,878
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	434.31	0.96	0.09	257.52	0.57	0.01	44.70	0.10	0.41	1,215	2.68	217.46	652,370	1,438
Construction Equipment	Backhoe	987.76	2.18	6.27	958.12	2.11	0.05	7.33	0.02	6.65	1,017	2.24	15,862	2,424,843	5,346
	Excavator	177.09	0.39	1.12	171.78	0.38	0.20	29.84	0.07	1.54	235.41	0.52	73,888	11,295,356	24,902
	Trencher	4,228	9.32	26.83	4,101	9.04	0.40	61.21	0.13	23.86	3,647	8.04	131,248	20,063,969	44,233

Activity 3: Stringing		PM_{10}		$PM_{2.5}$			SO_2			VOC			CO_2		
Construction Phases	Equipment	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	2,139	4.72	0.14	1,752	3.86	0.05	611.48	1.35	0.29	3,712	8.18	187.00	2,382,229	5,252
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43	217.46	347,931	767.06
Construction Equipment	Excavator w/ Vacculift	825.47	1.82	5.24	800.70	1.77	0.35	53.60	0.12	5.07	774.68	1.71	130,035	19,878,473	43,825
	RT Forklift	218.16	0.48	1.38	211.61	0.47	0.06	8.94	0.02	2.57	393.10	0.87	21,596	3,301,326	7,278
	Generator	61.30	0.14	0.39	59.46	0.13	0.03	4.53	0.01	1.77	270.30	0.60	11,243	1,718,748	3,789
	Skid Truck	141.05	0.31	0.89	136.82	0.30	0.20	31.15	0.07	1.37	209.93	0.46	77,373	11,828,044	26,076
	Water Truck	141.05	0.31	0.89	136.82	0.30	0.20	31.15	0.07	1.37	209.93	0.46	77,373	11,828,044	26,076

Activity 4: Welding and Lower In		PM_{10}		$PM_{2.5}$			SO_2			VOC			CO_2		
Construction Phases	Equipment	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	11,552	25.47	0.14	9,461	20.86	0.05	3,302	7.28	0.29	20,046	44.19	187.00	12,864,039	28,360
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	1,187	2.62	0.09	703.89	1.55	0.01	122.18	0.27	0.41	3,322	7.32	217.46	1,783,145	3,931
Construction Equipment	Backhoe	987.76	2.18	6.27	958.12	2.11	0.05	7.33	0.02	6.65	1,017	2.24	15,862	2,424,843	5,346
	Blade	199.25	0.44	1.26	193.28	0.43	0.19	29.62	0.07	1.65	252.20	0.56	73,223	11,193,623	24,678
	RT Crane	259.81	0.57	1.65	252.02	0.56	0.15	22.38	0.05	2.29	349.72	0.77	54,272	8,296,547	18,291
	Dozer	210.67	0.46	1.34	204.35	0.45	0.20	30.19	0.07	1.72	263.07	0.58	74,585	11,401,803	25,137
	Excavator	177.09	0.39	1.12	171.78	0.38	0.20	29.84	0.07	1.54	235.41	0.52	73,888	11,295,356	24,902
	RT Forklift	218.16	0.48	1.38	211.61	0.47	0.06	8.94	0.02	2.57	393.10	0.87	21,596	3,301,326	7,278
	Generator	61.30	0.14	0.39	59.46	0.13	0.03	4.53	0.01	1.77	270.30	0.60	11,243	1,718,748	3,789
	Sideboom	1,044	2.30	6.62	1,012	2.23	0.27	40.89	0.09	8.67	1,325	2.92	94,055	14,378,191	31,698
	Skid Truck	141.05	0.31	0.89	136.82	0.30	0.20	31.15	0.07	1.37	209.93	0.46	77,373	11,828,044	26,076
	Tack Rig	210.67	0.46	1.34	204.35	0.45	0.20	30.19	0.07	1.72	263.07	0.58	74,585	11,401,803	25,137
	Water Truck	141.05	0.31	0.89	136.82	0.30	0.20	31.15	0.07	1.37	209.93	0.46	77,373	11,828,044	26,076
	Welding Machine	69.38	0.15	0.44	67.30	0.15	0.03	4.84	0.01	1.88	287.20	0.63	12,003	1,834,827	4,045
	Welding Truck	141.05	0.31	0.89	136.82	0.30	0.20	31.15	0.07	1.37	209.93	0.46	77,373	11,828,044	26,076

Denbury Snowy River CO2 Project Emissions
Group 2 Flowline Construction

Total Miles 12.74

Activity 1: Clearing ROW		CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.03	1,150	2.53	8.40E-03	342.43	0.75	2.30E-03	93.93	0.21
	Heavy Duty Truck (Other listed activities)									
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.46	1,483	3.27	2.00E-03	6.40	0.01	3.77E-03	12.08	0.03
Construction Equipment	Backhoe				0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	0.09	26.92	0.06	0.40	121.36	0.27	0.74	225.25	0.50
	Dozer	0.09	28.66	0.06	0.37	112.02	0.25	1.89	577.91	1.27
	Water Truck	0.05	16.14	0.04	0.28	86.35	0.19	6.73	2,058	4.54

Activity 2: Trenching		CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.03	538.87	1.19	8.40E-03	160.51	0.35	2.30E-03	44.03	0.10
	Heavy Duty Truck (Other listed activities)									
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.46	1,390	3.06	2.00E-03	6.00	0.01	3.77E-03	11.32	0.02
Construction Equipment	Backhoe	0.44	67.81	0.15	0.17	25.67	0.06	3.02	461.22	1.02
	Excavator	0.07	11.35	0.03	0.36	55.08	0.12	0.82	125.65	0.28
	Trencher	1.60	244.34	0.54	0.64	98.02	0.22	1.68	257.44	0.57

Activity 3: Stringing		CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.03	359.25	0.79	8.40E-03	107.01	0.24	2.30E-03	29.35	0.06
	Heavy Duty Truck (Other listed activities)									
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Excavator w/ Vacculift	0.34	51.85	0.11	0.65	99.89	0.22	0.82	125.65	0.28
	RT Forklift	0.37	56.14	0.12	0.10	15.17	0.03	1.22	186.43	0.41
	Generator	0.24	36.12	0.08	0.08	11.67	0.03	0.89	135.84	0.30
	Skid Truck	0.05	8.07	0.02	0.28	43.18	0.10	6.73	1,029	2.27
	Water Truck	0.05	8.07	0.02	0.28	43.18	0.10	6.73	1,029	2.27

Activity 4: Welding and Lower In		CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.03	1,940	4.28	8.40E-03	577.85	1.27	2.30E-03	158.51	0.35
	Heavy Duty Truck (Other listed activities)									
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.46	3,800	8.38	2.00E-03	16.40	0.04	3.77E-03	30.95	0.07
Construction Equipment	Backhoe	0.44	67.81	0.15	0.17	25.67	0.06	3.02	461.22	1.02
	Blade	0.09	13.46	0.03	0.31	46.68	0.10	0.74	112.63	0.25
	RT Crane	0.15	23.18	0.05	0.28	43.18	0.10	1.75	266.96	0.59
	Dozer	0.09	14.33	0.03	0.37	56.01	0.12	1.89	288.96	0.64
	Excavator	0.07	11.35	0.03	0.36	55.08	0.12	0.82	125.65	0.28
	RT Forklift	0.37	56.14	0.12	0.10	15.17	0.03	1.22	186.43	0.41
	Generator	0.24	36.12	0.08	0.08	11.67	0.03	0.89	135.84	0.30
	Sideboom	0.64	97.20	0.21	0.47	71.18	0.16	1.75	266.96	0.59
	Skid Truck	0.05	8.07	0.02	0.28	43.18	0.10	6.73	1,029	2.27
	Tack Rig	0.09	14.33	0.03	0.39	59.51	0.13	1.89	288.96	0.64
	Water Truck	0.05	8.07	0.02	0.28	43.18	0.10	6.73	1,029	2.27
	Welding Machine	0.25	38.31	0.08	0.05	8.17	0.02	7.84	1,199	2.64
	Welding Truck	0.05	8.07	0.02	0.46	70.02	0.15	6.73	1,029	2.27

Denbury Snowy River CO2 Project Emissions
Group 2 Flowline Construction

Activity 5: X Ray

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x			
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	20,552	45.31	0.42	1,426	3.14	0.17
	Heavy Duty Truck (Other listed activities)															
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16	0.14
Construction Equipment	Generator	10.00	4.0	0.33	4.20	50.45				10.10	509.63	1.12	17.23	869.22	1.92	0.98
	X-Ray Truck	100.00	4.0	0.33	4.20	50.45				2.80	141.49	0.31	16.14	814.26	1.80	0.92

Activity 6: Testing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x			
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	4,671	10.30	0.42	324.01	0.71	0.17
	Heavy Duty Truck (Other listed activities)															
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04	0.14
Construction Equipment	Air Compressor/Dryer	400.00	2.0	0.10	1.27	15.29				37.95	580.12	1.28	140.25	2,144	4.73	6.17
	RT Forklift	65.00	2.0	0.10	1.27	15.29				12.90	197.14	0.43	95.48	1,460	3.22	1.43
	Generator	50.00	2.0	0.10	1.27	15.29				5.34	81.60	0.18	48.26	737.78	1.63	0.40

Activity 7: Backfill

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x			
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	70,062	154.46	0.42	4,860	10.71	0.17
	Heavy Duty Truck (Other listed activities)															
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08	0.14
Construction Equipment	Blade	260.00	2.0	1.00	12.74	152.87				4.95	756.70	1.67	20.71	3,166	6.98	1.30
	Dozer	240.00	2.0	1.00	12.74	152.87				5.30	810.11	1.79	21.66	3,310	7.30	1.38
	Excavator	236.00	2.0	1.00	12.74	152.87				4.15	633.73	1.40	18.73	2,864	6.31	1.16
	Generator	50.00	1.0	1.00	12.74	152.87				5.34	815.96	1.80	48.26	7,378	16.27	0.40
	Roller	145.00	2.0	1.00	12.74	152.87				10.67	1,631	3.60	25.19	3,851	8.49	2.72

Activity 8: Corrosion Protection

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x			
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						5	1	100	6.11	12,845	28.32	0.42	891.02	1.96	0.17
	Heavy Duty Truck (Other listed activities)															
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08	0.14
Construction Equipment	Air Compressor	85.00	2.0	0.33	4.20	50.45				9.84	496.45	1.09	43.11	2,175	4.79	1.74
	Generator	10.00	1.0	0.33	4.20	50.45				10.10	509.63	1.12	17.23	869.22	1.92	0.98
	Paint Truck	185.00	2.0	0.33	4.20	50.45				2.80	141.49	0.31	16.14	814.26	1.80	0.92

Activity 9: Reclaim

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x			
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	186,832	411.89	0.42	12,960	28.57	0.17
	Heavy Duty Truck (Other listed activities)															
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16	0.14
Construction Equipment	Backhoe	110.00	4.0	2.00	25.48	305.74				27.40	8,377	18.47	41.31	12,629	27.84	6.46
	Blade	200.00	4.0	2.00	25.48	305.74				4.95	1,513	3.34	20.71	6,331	13.96	1.30
	Farm Tractor	190.00	4.0	2.00	25.48	305.74				2.80	857.50	1.89	16.14	4,935	10.88	0.92

Denbury Snowy River CO2 Project Emissions
Group 2 Flowline Construction

Activity 5: X Ray		PM_{10}		$PM_{2.5}$			SO_2			VOC			CO_2		
Construction Phases	Equipment	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	564.77	1.25	0.14	462.53	1.02	0.05	161.43	0.36	0.29	980.02	2.16	187.00	628,909	1,387
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43	217.46	347,931	767.06
Construction Equipment	Generator	49.21	0.11	0.95	47.73	0.11	8.91E-03	0.45	9.90E-04	3.45	173.98	0.38	2,422	122,187	269.38
	X-Ray Truck	46.55	0.10	0.89	45.15	0.10	0.20	10.28	0.02	1.37	69.28	0.15	77,373	3,903,254	8,605

Activity 6: Testing		PM_{10}		$PM_{2.5}$			SO_2			VOC			CO_2		
Construction Phases	Equipment	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	128.36	0.28	0.14	105.12	0.23	0.05	36.69	0.08	0.29	222.73	0.49	187.00	142,934	315.12
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36	217.46	86,983	191.76
Construction Equipment	Air Compressor/Dryer	94.39	0.21	5.99	91.56	0.20	0.25	3.84	8.47E-03	8.14	124.44	0.27	88,895	1,358,946	2,996
	RT Forklift	21.82	0.05	1.38	21.16	0.05	0.06	0.89	1.97E-03	2.57	39.31	0.09	21,596	330,133	727.82
	Generator	6.13	0.01	0.39	5.95	0.01	0.03	0.45	9.99E-04	1.77	27.03	0.06	11,243	171,875	378.92

Activity 7: Backfill		PM_{10}		$PM_{2.5}$			SO_2			VOC			CO_2		
Construction Phases	Equipment	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	1,925	4.24	0.14	1,577	3.48	0.05	550.33	1.21	0.29	3,341	7.37	187.00	2,144,007	4,727
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71	217.46	173,965	383.53
Construction Equipment	Blade	199.25	0.44	1.26	193.28	0.43	0.19	29.62	0.07	1.65	252.20	0.56	73,223	11,193,623	24,678
	Dozer	210.67	0.46	1.34	204.35	0.45	0.20	30.19	0.07	1.72	263.07	0.58	74,585	11,401,803	25,137
	Excavator	177.09	0.39	1.12	171.78	0.38	0.20	29.84	0.07	1.54	235.41	0.52	73,888	11,295,356	24,902
	Generator	61.30	0.14	0.39	59.46	0.13	0.03	4.53	0.01	1.77	270.30	0.60	11,243	1,718,748	3,789
	Roller	415.74	0.92	2.64	403.27	0.89	0.11	17.25	0.04	1.67	255.18	0.56	41,867	6,400,219	14,110

Activity 8: Corrosion Protection		PM_{10}		$PM_{2.5}$			SO_2			VOC			CO_2		
Construction Phases	Equipment	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	352.98	0.78	0.14	289.08	0.64	0.05	100.89	0.22	0.29	612.51	1.35	187.00	393,068	866.57
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71	217.46	173,965	383.53
Construction Equipment	Air Compressor	87.73	0.19	1.69	85.10	0.19	0.06	2.99	6.59E-03	1.14	57.61	0.13	21,856	1,102,599	2,431
	Generator	49.21	0.11	0.95	47.73	0.11	8.91E-03	0.45	9.90E-04	3.45	173.98	0.38	2,422	122,187	269.38
	Paint Truck	46.55	0.10	0.89	45.15	0.10	0.20	10.28	0.02	1.37	69.28	0.15	77,373	3,903,254	8,605

Activity 9: Reclaim		PM_{10}		$PM_{2.5}$			SO_2			VOC			CO_2		
Construction Phases	Equipment	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	5,134	11.32	0.14	4,205	9.27	0.05	1,468	3.24	0.29	8,909	19.64	187.00	5,717,351	12,605
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43	217.46	347,931	767.06
Construction Equipment	Backhoe	1,976	4.36	6.27	1,916	4.22	0.05	14.66	0.03	6.65	2,034	4.48	15,862	4,849,686	10,692
	Blade	398.51	0.88	1.26	386.55	0.85	0.19	59.24	0.13	1.65	504.40	1.11	73,223	22,387,246	49,355
	Farm Tractor	282.09	0.62	0.89	273.63	0.60	0.20	62.30	0.14	1.37	419.85	0.93	77,373	23,656,088	52,153

Denbury Snowy River CO2 Project Emissions
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Activity 5: X Ray		CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.03	94.84	0.21	8.40E-03	28.25	0.06	2.30E-03	7.75	0.02
	Heavy Duty Truck (Other listed activities)									
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Generator	0.30	15.33	0.03	0.02	0.77	1.70E-03	0.89	44.83	0.10
	X-Ray Truck	0.05	2.66	5.87E-03	0.15	7.70	0.02	6.73	339.53	0.75

Activity 6: Testing		CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.03	21.55	0.05	8.40E-03	6.42	0.01	2.30E-03	1.76	3.88E-03
	Heavy Duty Truck (Other listed activities)									
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Air Compressor/Dryer	0.62	9.49	0.02	0.61	9.34	0.02	0.89	13.58	0.03
	RT Forklift	0.37	5.61	0.01	0.10	1.52	3.34E-03	1.22	18.64	0.04
	Generator	0.24	3.61	7.96E-03	0.08	1.17	2.57E-03	0.89	13.58	0.03

Activity 7: Backfill		CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.03	323.32	0.71	8.40E-03	96.31	0.21	2.30E-03	26.42	0.06
	Heavy Duty Truck (Other listed activities)									
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	0.09	13.46	0.03	0.40	60.68	0.13	0.74	112.63	0.25
	Dozer	0.09	14.33	0.03	0.37	56.01	0.12	1.89	288.96	0.64
	Excavator	0.07	11.35	0.03	0.36	55.08	0.12	0.82	125.65	0.28
	Generator	0.24	36.12	0.08	0.08	11.67	0.03	0.89	135.84	0.30
	Roller	0.13	20.38	0.04	0.22	33.84	0.07	1.19	181.76	0.40

Activity 8: Corrosion Protection		CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.03	59.28	0.13	8.40E-03	17.66	0.04	2.30E-03	4.84	0.01
	Heavy Duty Truck (Other listed activities)									
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Air Compressor	0.10	4.83	0.01	0.13	6.55	0.01	0.89	44.83	0.10
	Generator	0.30	15.33	0.03	0.02	0.77	1.70E-03	0.89	44.83	0.10
	Paint Truck	0.05	2.66	5.87E-03	0.28	14.25	0.03	6.73	339.53	0.75

Activity 9: Reclaim		CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.03	862.19	1.90	8.40E-03	256.82	0.57	2.30E-03	70.45	0.16
	Heavy Duty Truck (Other listed activities)									
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Backhoe	0.44	135.63	0.30	0.17	51.34	0.11	3.02	922.45	2.03
	Blade	0.09	26.92	0.06	0.31	93.35	0.21	0.74	225.25	0.50
	Farm Tractor	0.05	16.14	0.04	0.29	88.69	0.20	6.73	2,058	4.54

Denbury Snowy River CO2 Project Emissions
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Total Disturbed Acres **5.00**

Activity 1: Clearing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	4,889	10.78	0.42	339.12	0.75
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Backhoe				0.00E+00	0.00E+00									
	Blade	300.00	2.00	0.20	1.00	12.00				4.95	59.40	0.13	20.71	248.50	0.55
	Dozer	400.00	3.00	0.20	1.00	12.00				41.39	496.62	1.09	98.38	1,181	2.60
	Scraper	400.00	3.00	0.20	1.00	12.00				43.35	520.16	1.15	102.59	1,231	2.71

Activity 2: Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	48,886	107.78	0.42	3,391	7.48
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						0.00E+00	2	100	1.65	0.00E+00	0.00E+00	4.58	0.00E+00	0.00E+00
Construction Equipment	Blade	300.00	2.00	2.00	10.00	120.00				4.95	594.00	1.31	20.71	2,485	5.48
	Dozer	400.00	3.00	2.00	10.00	120.00				41.39	4,966	10.95	98.38	11,805	26.03
	Scraper	400.00	3.00	2.00	10.00	120.00				43.35	5,202	11.47	102.59	12,310	27.14

Activity 3: Pump Station Construction

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days total)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	302,485	666.86	0.42	20,983	46.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5.34	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22.17	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7.29	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26.24	12,594	27.77	65.08	31,241	68.87
	Forklift	115.00	1.00	55.00	55.00	660.00				3.94	2,598	5.73	13.47	8,887	19.59
	Generator	25.00	3.00	55.00	55.00	660.00				14.43	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				25.84	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 2 Flowline Construction

Total Disturbed Acres **5.00**

Activity 1: Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	134.34	0.30	0.14	110.02	0.24	0.05	38.40	0.08	0.29	233.12	0.51
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Backhoe												
	Blade	1.30	15.64	0.03	1.26	15.17	0.03	0.19	2.33	5.13E-03	1.65	19.80	0.04
	Dozer	7.76	93.16	0.21	7.53	90.36	0.20	0.37	4.42	0.01	7.10	85.17	0.19
	Scraper	8.06	96.67	0.21	7.81	93.77	0.21	0.37	4.40	0.01	7.34	88.09	0.19

Activity 2: Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,343	2.96	0.14	1,100	2.43	0.05	384.00	0.85	0.29	2,331	5.14
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	0.00E+00	0.00E+00	0.09	0.00E+00	0.00E+00	0.01	0.00E+00	0.00E+00	0.41	0.00E+00	0.00E+00
Construction Equipment	Blade	1.30	156.41	0.34	1.26	151.72	0.33	0.19	23.25	0.05	1.65	197.97	0.44
	Dozer	7.76	931.56	2.05	7.53	903.61	1.99	0.37	44.23	0.10	7.10	851.74	1.88
	Scraper	8.06	966.72	2.13	7.81	937.72	2.07	0.37	44.04	0.10	7.34	880.85	1.94

Activity 3: Pump Station Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	8,313	18.33	0.14	6,808	15.01	0.05	2,376	5.24	0.29	14,424	31.80
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Forklift	0.88	578.98	1.28	0.85	561.61	1.24	0.11	74.64	0.16	0.66	432.85	0.95
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66	1,754	3.87	0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 2 Flowline Construction

Total Disturbed Acres 5.00

Activity 1: Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	149,600	329.81	0.03	22.56	0.05	8.40E-03	6.72	0.01	2.30E-03	1.84	4.06E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	73,223	878,676	1,937	0.09	1.06	2.33E-03	0.46	5.50	0.01	0.74	8.84	0.02
	Dozer	134,685	1,616,221	3,563	0.51	6.11	0.01	0.61	7.33	0.02	1.89	22.68	0.05
	Scraper	133,797	1,605,567	3,540	0.53	6.37	0.01	0.61	7.33	0.02	3.04	36.51	0.08

Activity 2: Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,496,000	3,298	0.03	225.60	0.50	8.40E-03	67.20	0.15	2.30E-03	18.43	0.04
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	0.00E+00	0.00E+00	0.46	0.00E+00	0.00E+00	2.00E-03	0.00E+00	0.00E+00	3.77E-03	0.00E+00	0.00E+00
Construction Equipment	Blade	73,223	8,786,758	19,371	0.09	10.57	0.02	0.46	54.96	0.12	0.74	88.41	0.19
	Dozer	134,685	16,162,214	35,632	0.51	61.10	0.13	0.61	73.28	0.16	1.89	226.83	0.50
	Scraper	133,797	16,055,671	35,397	0.53	63.68	0.14	0.61	73.28	0.16	3.04	365.09	0.80

Activity 3: Pump Station Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	9,256,500	20,407	0.03	1,396	3.08	8.40E-03	415.80	0.92	2.30E-03	114.06	0.25
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	6.79	0.01
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89	586.46	1.29
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Forklift	42,947	28,344,784	62,490	0.05	30.16	0.07	0.18	115.87	0.26	0.57	373.49	0.82
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 2 Road Maintenance and Construction

New Roads

Miles 2.75

Activity 1: Road Clear										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	30,248	66.69	0.42	2,098	4.63
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor/Dryer				–	–									
	Blade	300.00	3.00	2.00	5.50	66.00				4.95	326.70	0.72	20.71	1,367	3.01
	Dozer	400.00	3.00	2.00	5.50	66.00				41.39	2,731	6.02	98.38	6,493	14.31
	Scraper	400.00	3.00	2.00	5.50	66.00				43.35	2,861	6.31	102.59	6,771	14.93

Activity 2: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	40,331	88.92	0.42	2,798	6.17
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	150	1.65	1,981	4.37	4.58	5,498	12.12
Construction Equipment	Blade	300.00	2.00	2.00	5.50	66.00				4.95	326.70	0.72	20.71	1,367	3.01
	Dozer	400.00	3.00	2.00	5.50	66.00				41.39	2,731	6.02	98.38	6,493	14.31
	Dump Truck	350.00	4.00	2.00	5.50	66.00				7.76	512.28	1.13	33.63	2,220	4.89
	Scraper	400.00	3.00	2.00	5.50	66.00				43.35	2,861	6.31	102.59	6,771	14.93

Two-Tracks Road Modifications

Miles 1.39

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	20,386	44.94	0.42	1,414	3.12
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						12	2	150	1.65	5,944	13.10	4.58	16,495	36.36
Construction Equipment	Blade	300.00	2.00	2.00	2.78	33.36				4.95	165.13	0.36	20.71	690.83	1.52
	Dozer	400.00	3.00	2.00	2.78	33.36				41.39	1,381	3.04	98.38	3,282	7.24
	Dump Truck	350.00	4.00	2.00	2.78	33.36				7.76	258.93	0.57	33.63	1,122	2.47
	Scraper	400.00	3.00	2.00	2.78	33.36				43.35	1,446	3.19	102.59	3,422	7.54

Existing Roads

Miles –

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						2	1	100	6.11	–	–	0.42	–	–
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	–	–	4.58	–	–
Construction Equipment	Blade	300.00	2.00	2.00	–	–				4.95	–	–	20.71	–	–

Denbury Snowy River CO2 Project Emissions
Group 2 Road Maintenance and Construction

New Roads

Miles 2.75

Activity 1: Road Clear		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	831.25	1.83	0.14	680.77	1.50	0.05	237.60	0.52	0.29	1,442	3.18
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor/Dryer												
	Blade	1.30	86.03	0.19	1.26	83.44	0.18	0.19	12.79	0.03	1.65	108.88	0.24
	Dozer	7.76	512.36	1.13	7.53	496.99	1.10	0.37	24.33	0.05	7.10	468.46	1.03
	Scraper	8.06	531.70	1.17	7.81	515.75	1.14	0.37	24.22	0.05	7.34	484.47	1.07

Activity 2: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,108	2.44	0.14	907.70	2.00	0.05	316.80	0.70	0.29	1,923	4.24
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	173.72	0.38	0.09	103.01	0.23	0.01	17.88	0.04	0.41	486.12	1.07
Construction Equipment	Blade	1.30	86.03	0.19	1.26	83.44	0.18	0.19	12.79	0.03	1.65	108.88	0.24
	Dozer	7.76	512.36	1.13	7.53	496.99	1.10	0.37	24.33	0.05	7.10	468.46	1.03
	Dump Truck	2.08	137.05	0.30	2.01	132.93	0.29	0.35	23.19	0.05	2.72	179.44	0.40
	Scraper	8.06	531.70	1.17	7.81	515.75	1.14	0.37	24.22	0.05	7.34	484.47	1.07

Two-Tracks Road Modifications

Miles 1.39

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	560.21	1.24	0.14	458.80	1.01	0.05	160.13	0.35	0.29	972.11	2.14
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	521.17	1.15	0.09	309.02	0.68	0.01	53.64	0.12	0.41	1,458	3.22
Construction Equipment	Blade	1.30	43.48	0.10	1.26	42.18	0.09	0.19	6.46	0.01	1.65	55.04	0.12
	Dozer	7.76	258.97	0.57	7.53	251.20	0.55	0.37	12.30	0.03	7.10	236.78	0.52
	Dump Truck	2.08	69.27	0.15	2.01	67.19	0.15	0.35	11.72	0.03	2.72	90.70	0.20
	Scraper	8.06	268.75	0.59	7.81	260.69	0.57	0.37	12.24	0.03	7.34	244.88	0.54

Existing Roads

Miles —

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	—	—	0.14	27.51	0.06	0.05	—	—	0.29	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	—	—	0.09	34.34	0.08	0.01	—	—	0.41	—	—
Construction Equipment	Blade	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—

Denbury Snowy River CO2 Project Emissions
Group 2 Road Maintenance and Construction

New Roads

Miles 2.75

Activity 1: Road Clear		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	925,650	2,041	0.03	139.59	0.31	8.40E-03	41.58	0.09	2.30E-03	11.41	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	6.79	0.01
Construction Equipment	Air Compressor/Dryer							—	—	—	—	—	—
	Blade	73,223	4,832,717	10,654	0.09	5.81	0.01	0.46	30.23	0.07	0.74	48.63	0.11
	Dozer	134,685	8,889,218	19,597	0.51	33.61	0.07	0.61	40.30	0.09	1.89	124.75	0.28
	Scraper	133,797	8,830,619	19,468	0.53	35.02	0.08	0.61	40.30	0.09	3.04	200.80	0.44

Activity 2: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,234,200	2,721	0.03	186.12	0.41	8.40E-03	55.44	0.12	2.30E-03	15.21	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	260,948	575.29	0.46	556.08	1.23	2.00E-03	2.40	5.29E-03	3.77E-03	4.53	0.01
Construction Equipment	Blade	73,223	4,832,717	10,654	0.09	5.81	0.01	0.46	30.23	0.07	0.74	48.63	0.11
	Dozer	134,685	8,889,218	19,597	0.51	33.61	0.07	0.61	40.30	0.09	1.89	124.75	0.28
	Dump Truck	132,987	8,777,110	19,350	0.13	8.53	0.02	0.53	35.27	0.08	6.73	444.21	0.98
	Scraper	133,797	8,830,619	19,468	0.53	35.02	0.08	0.61	40.30	0.09	3.04	200.80	0.44

Two-Tracks Road Modifications

Miles 1.39

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	623,832	1,375	0.03	94.08	0.21	8.40E-03	28.02	0.06	2.30E-03	7.69	0.02
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	782,844	1,726	0.46	1,668	3.68	2.00E-03	7.20	0.02	3.77E-03	13.59	0.03
Construction Equipment	Blade	73,223	2,442,719	5,385	0.09	2.94	6.48E-03	0.45	15.28	0.03	0.74	24.58	0.05
	Dozer	134,685	4,493,096	9,906	0.51	16.99	0.04	0.61	20.37	0.04	1.89	63.06	0.14
	Dump Truck	132,987	4,436,430	9,781	0.13	4.31	0.01	0.53	17.83	0.04	6.73	224.53	0.50
	Scraper	133,797	4,463,476	9,840	0.53	17.70	0.04	0.61	20.37	0.04	3.04	101.50	0.22

Existing Roads

Miles —

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	—	—	0.03	—	—	8.40E-03	—	—	2.30E-03	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	—	—	0.46	—	—	2.00E-03	—	—	3.77E-03	—	—
Construction Equipment	Blade	73,223	—	—	0.09	—	—	0.45	—	—	0.74	—	—

Denbury Snowy River CO2 Project Emissions
Group 2 Fugitive Dust Emissions from Paved Roads

Summary of Fugitive Emissions

Paved Roads emission factor from AP-42, Section 13.2.1: *Paved Roads* (01/11)

$$E = k(sL)^{0.91}(W)^{1.02}(1-P/(4*365))$$

where:

sL =	0.6	road surface silt loading silt loading (g/m2) [Table 13.2.1-2, for Ubiquitous Baseline, <500]
W_{LDT} =	4	tons [Average vehicle weight]
$W_{Tractor}$ =	25	tons [Average vehicle weight]
k =	0.0022	lb/VMT [Table 13.2.1-1, for PM_{10}]
k =	0.00054	lb/VMT [Table 13.2.1-1, for $PM_{2.5}$]
P =	100	days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.1-2]

1/2 Ton Trucks (light-duty trucks)

$E_{(PM10)}$ = 5.29E-03 lb/VMT

$E_{(PM2.5)}$ = 1.30E-03 lb/VMT

126	Duration of Construction (days)-Well Pad Construction
112	Duration of Construction (days)-Flow/Bulk Line Construction
66	Duration of Construction (days)-Pump Station Construction
3	Duration of Construction (days)-Road Construction (existing and two-track roads)

Tractor Trailers

$E_{(PM10)}$ = 3.43E-02 lb/VMT

$E_{(PM2.5)}$ = 8.43E-03 lb/VMT

2	Equipment Delivery (days) -Well Pad Construction
2	Equipment Delivery (days) -Flow/Bulk Line Construction
2	Equipment Delivery (days) -Pump Station Construction
2	Equipment Delivery (days) -Road Construction (existing and two-track roads)

Project Segment

Equipment Type	Average Vehicle Weight (tons)[a]	Well Pad Construction			Flow/Bulk Line Construction			Pump Station Construction			Road Construction		
		VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]
Light Duty Trucks	4	100	22	277288	100	135	1506537	100	25	165000	100	12	3336
Tractor Trailers	25	100	21	4200	100	106	21200	100	17	3400	100	12	2400
Total VMT				281488			1527737			168400			5736
a - Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.													
PM10 (tons)				**0.81**			**4.35**			**0.50**			**0.05**
PM2.5 (tons)				**0.20**			**1.07**			**0.12**			**0.01**

Project Totals

Total Paved Road Emissions	
Pollutant	**tons**
PM_{10}	**5.70**
$PM_{2.5}$	**1.40**

[a] *Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.*

[b] VMT per day are projected based on experience from previous construction projects.

[c] Vehicle Miles Traveled (VMT) are based on the vehicle quantity , project duration, and experience from previous construction projects.

Denbury Snowy River CO2 Project Emissions
Group 2 Fugitive Dust Emissions from Unpaved Roads

Summary of Fugitive Emissions

Unpaved Roads emission factor from AP-42, Section 13.2.2: *Unpaved Roads* (11/06); Equations a1 and 2

$$E = k\,(s/12)^a (W/3)^b \qquad (1a)$$

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight

Table 13.2.2-2 - Constants for Equation 1a

Constant	PM2.5	PM10
k (lb/VMT)	0.15	1.5
a	0.9	0.9
b	0.45	0.45

Surface Silt (s) content based on Table 13.2.2-1 - construction sites

s = 8.50

$$E_{ext} = E\,[(365 - P)/365] \qquad (2)$$

E_{ext} = annual size-specific emisison factor extrapolated for natural mitigation, lb/VMT

E = emisison factor from Equation 1a

P = days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.2-1

P = 100

Equipment	Construction Duration (days)	Miles per Day	Quantity	Total Vehicle Miles Traveled[a] (VMT)	W: Mean Vehicle Weight (tons)[b]	Emission Factors (lb/VMT)[c]		Emissions (tons)		Controlled Emissions (tons)	
						PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Well Pad Construction											
1/2 Ton Trucks	13	100	0	25,700	12.02941176	1.492	0.149	19.168	1.917	9.6	1.0
							Total (tons)	**19.168**	**1.917**	**9.6**	**1.0**

(a) VMT per day are projected based on experience from previous construction projects
(b) Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.
(c) AP 42 Section 13.2.2 Unpaved Roads, dated November 2006, Equations 1a and 2

Denbury Snowy River CO2 Project Emissions
Group 2 Fugitive Dust Emissions from Earthmoving Activities

Construction Activity	Activity Type	Approximate Pipeline Length or Road Length (mi)	Excavation Volume[a] (ft^3)	Temporary Workspace for Construction (acres)[b]
Bulkline 1 Injection Wells 03 04 05	Pipeline	3.76	357,816	2.74
Bulkline 1A Injection Wells 01 02 06 07	Pipeline	6.49	616,860	4.72
Flowline Injection Well 03	Pipeline	0.60	57,390	0.44
Flowline Injection Well 02	Pipeline	0.44	41,985	0.32
Flowline Injection Well 01	Pipeline	1.44	136,682	1.05
New Road – Existing Pipeline Corridor	Access Roads	2.08	329,472	7.56
Pump Station North New Road	Access Roads	0.25	39,600	0.91
BLM Two-Track Injection Well 01	Access Roads	1.39	220,176	5.05
New Road Injection Well 02	Access Roads	0.39	61,776	1.42
New Road Injection Well 01	Access Roads	0.03	4,752	0.11
Pump Station North	Pump Station Construction	--	653,400	5
Injection Well 02 Construction Pad	Well Pad Construction	--	601128	4.6
Injection Well 01 Construction Pad	Well Pad Construction	--	601128	4.6

Project Construction Activity Particulate Matter Emissions

Construction Activity	Excavation[a] (tons)	Excavation PM_{10} Emission Factor[c] (lb/ton)	Pipeline Excavation PM_{10} Emissions (tons)	Backfilling[a] (tons)	Backfilling PM_{10} Emission Factor[b] (lb/ton)	Backfilling PM10 Emissions (tpy)	Windblown Dust Area (acre)	PM_{10} Windblown Dust Emission Factor[d,e] (tons/acre)	Windblown Dust PM_{10} Emissions - Uncontrolled (tons)	Total Construction Activity PM_{10} emissions (tons)	Total Controlled Construction Activity PM_{10} emissions[g] (tons)	Total Construction Activity $PM_{2.5}$ emissions[f] (tons)	Total Controlled Construction Activity $PM_{2.5}$ emissions[g] (tons)
Bulkline 1 Injection Wells 03 04 05	17,891	0.058	0.519	17,891	0.012	0.107	2.7	3.80E-01	1.04	1.667	0.833	0.347	0.173
Bulkline 1A Injection Wells 01 02 06 07	30,843	0.058	0.894	30,843	0.012	0.185	4.7	3.80E-01	1.79	2.873	1.437	0.598	0.299
Flowline Injection Well 03	2,870	0.058	0.083	2,870	0.012	0.017	0.4	3.80E-01	0.17	0.267	0.134	0.056	0.028
Flowline Injection Well 02	2,099	0.058	0.061	2,099	0.012	0.013	0.3	3.80E-01	0.12	0.196	0.098	0.041	0.020
Flowline Injection Well 01	6,834	0.058	0.198	6,834	0.012	0.041	1.0	3.80E-01	0.40	0.637	0.318	0.132	0.066
New Road – Existing Pipeline Corridor	16,474	0.058	0.478	16,474	0.012	0.099	7.6	3.80E-01	2.87	3.451	1.725	0.718	0.359
Pump Station North New Road	1,980	0.058	0.057	1,980	0.012	0.012	0.9	3.80E-01	0.35	0.415	0.207	0.086	0.043
BLM Two-Track Injection Well 01	11,009	0.058	0.319	11,009	0.012	0.066	5.1	3.80E-01	1.92	2.306	1.153	0.480	0.240
New Road Injection Well 02	3,089	0.058	0.090	3,089	0.012	0.019	1.4	3.80E-01	0.54	0.647	0.324	0.135	0.067
New Road Injection Well 01	238	0.058	0.007	238	0.012	0.001	0.1	3.80E-01	0.04	0.050	0.025	0.010	0.005
Pump Station North	32,670	0.058	0.947	32,670	0.012	0.196	5.0	3.80E-01	1.90	3.043	1.522	0.633	0.317
Injection Well 02 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
Injection Well 01 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
									Total	**21.151**	**10.576**	**4.399**	**2.200**

(a) Excavation of well pad sites assumed to be 3 feet deep. Excavation and backfilling assumes pipeline will be 6 ft x 3 ft x approximate length (ft) for the Project component. Excavation for road construction assumes road excavation is 30 ft width x 1 ft deep x approximate road length (ft). Soil density is assumed to be 100 lb/ft^3

(b) Temporary workspace acres for roadways assumed to be 30 ft width x approximate road length (mi).

(c) Excavation and backfilling factors from AP-42, Table 11.9-4 (dated 7/98), assuming 100% of TSP is PM_{10}

(d) Windblown dust factor from AP-42 Table 11.9-4 Uncontrolled Particulate Emission Factors for Open Dust Sources

(e) PM_{10} emissions are conservatively assumed to be 100% of TSP.

(f) $PM_{2.5}$ emissions were calculated following the SCAQMD Particulate Matter $PM_{2.5}$ Significance Thresholds and Calculation Methodology (2006). For construction and demolition fugitive dust sources, 20.8% of the PM_{10} would be $PM_{2.5}$

(g) Controls are conservatively assumed to have a 50% reduction factor based on Emission Factors for Paved and Unpaved Roads (1/2015) Utah DEQ

Denbury Snowy River CO2 Project Emissions
Construction Group 3 Emissions Summary

Uncontrolled Emissions Summary (U.S. Tons Total)

Category	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-year GWP CO_2e	100- year GWP CO_2e	HAPS
Well Construction	0.65	0.41	0.03	0.03	4.89E-03	0.05	298.91	6.18E-03	5.08E-03	300.81	300.48	5.59E-03
Flow/Bulk Line Construction	0.28	0.17	0.01	0.01	2.34E-03	0.02	83.80	0.01	7.06E-04	85.00	84.36	2.89E-03
Road Construction	0.17	0.10	0.01	8.05E-03	1.49E-03	0.01	115.46	3.50E-03	7.21E-04	115.95	115.76	2.88E-03
Paved Roads			1.96	0.48								
Unpaved Roads			**7.01**	**0.70**								
Earthmoving			5.65	1.18								
Total	1.11	0.68	**14.68**	**2.41**	8.72E-03	0.08	498.18	0.02	6.51E-03	501.76	500.60	0.01

Controlled Emissions Summary (U.S. Tons Total)

Category	PM_{10}	$PM_{2.5}$
Well Construction	0.03	0.03
Flow/Bulk Line Construction	0.01	0.01
Road Construction	0.01	8.05E-03
Paved Roads	1.96	0.48
Unpaved Roads	3.51	0.35
Earthmoving	1.40	0.59
Controlled Total	6.92	1.47

Denbury Snowy River CO2 Project Emissions
Group 3 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						3	1	100	6.11	3,373	7.44	0.42	233.99	0.52
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						3	2	100	1.65	990.66	2.18	4.58	2,749	6.06
Construction Equipment	Backhoe					0.00E+00									
	Dozer	153.00	2.00	0.20	1.84	22.08				6.06	133.89	0.30	19.27	425.53	0.94
	Excavator	160.00	1.00	0.20	1.84	22.08				5.28	116.67	0.26	17.08	377.21	0.83

Activity 2: Drill Pad Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	33,732	74.37	0.42	2,340	5.16
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						5	2	100	1.65	1,651	3.64	4.58	4,582	10.10
Construction Equipment	Blade	140.00	1.00	0.25	2.30	27.60				6.09	167.98	0.37	19.47	537.36	1.18
	Dozer	153.00	1.00	1.00	9.20	110.40				6.06	669.43	1.48	19.27	2,128	4.69
	Roller Compactor	156.00	1.00	0.25	2.30	27.60				10.67	294.50	0.65	25.19	695.26	1.53
	Scraper	400.00	3.00	1.00	9.20	110.40				43.35	4,785	10.55	102.59	11,326	24.97

Activity 3: Drill Pad Drilling

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						4.00	1	100	6	224,051	493.95	0.42	15,542	34.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4.00	2	100	2	1,321	2.91	4.58	3,666	8.08
Construction Equipment (Drill Rig)	Generator	3,000	4.00	60.00	60.00	720.00				88	63,515	140.03	234.63	168,931	372.43

Activity 4: Drill Pad Construction

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9.00	1	100	6	205,380	452.79	0.42	14,247	31.41
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9.00	2	100	2	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26	12,594	27.77	65.08	31,241	68.87
	Generator	25.00	3.00	55.00	55.00	660.00				14	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				26	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 3 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	92.70	0.20	0.14	75.92	0.17	0.05	26.50	0.06	0.29	160.85	0.35
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	86.86	0.19	0.09	51.50	0.11	0.01	8.94	0.02	0.41	243.06	0.54
Construction Equipment	Backhoe												
	Dozer	1.45	31.98	0.07	1.40	31.02	0.07	0.11	2.52	5.56E-03	0.96	21.23	0.05
	Excavator	1.24	27.28	0.06	1.20	26.46	0.06	0.12	2.54	5.61E-03	0.85	18.80	0.04

Activity 2: Drill Pad Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	926.97	2.04	0.14	759.17	1.67	0.05	264.96	0.58	0.29	1,609	3.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	144.77	0.32	0.09	85.84	0.19	0.01	14.90	0.03	0.41	405.10	0.89
Construction Equipment	Blade	1.45	39.96	0.09	1.40	38.76	0.09	0.12	3.26	7.19E-03	0.97	26.71	0.06
	Dozer	1.45	159.90	0.35	1.40	155.10	0.34	0.11	12.62	0.03	0.96	106.15	0.23
	Roller Compactor	2.72	75.06	0.17	2.64	72.81	0.16	0.11	3.11	6.87E-03	1.67	46.07	0.10
	Scraper	8.06	889.39	1.96	7.81	862.70	1.90	0.37	40.52	0.09	7.34	810.38	1.79

Activity 3: Drill Pad Drilling		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	6,157	13.57	0.14	3,301	7.28	0.05	1,760	3.88	0.29	10,684	23.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment (Drill Rig)	Generator	10.64	7,661	16.89	10.32	7,431	16.38	0.42	302.18	0.67	13.21	9,510	20.97

Activity 4: Drill Pad Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	5,644	12.44	0.14	6,808	15.01	0.05	1,613	3.56	0.29	9,794	21.59
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66	1,754	3.87	0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 3 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	103,224	227.57	0.03	15.57	0.03	8.40E-03	4.64	0.01	2.30E-03	1.27	2.80E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	130,474	287.65	0.46	278.04	0.61	2.00E-03	1.20	2.65E-03	3.77E-03	2.26	4.99E-03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Dozer	43,104	951,739	2,098	0.07	1.65	3.64E-03	0.23	5.16	0.01	1.89	41.74	0.09
	Excavator	43,580	962,237	2,121	0.06	1.41	3.11E-03	0.24	5.39	0.01	0.82	18.15	0.04

Activity 2: Drill Pad Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,032,240	2,276	0.03	155.66	0.34	8.40E-03	46.37	0.10	2.30E-03	12.72	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	217,457	479.41	0.46	463.40	1.02	2.00E-03	2.00	4.41E-03	3.77E-03	3.77	8.32E-03
Construction Equipment	Blade	44,593	1,230,761	2,713	0.07	2.06	4.55E-03	0.21	5.90	0.01	0.74	20.33	0.04
	Dozer	43,104	4,758,694	10,491	0.07	8.25	0.02	0.23	25.79	0.06	1.89	208.68	0.46
	Roller Compactor	41,867	1,155,529	2,548	0.13	3.68	8.11E-03	0.24	6.57	0.01	1.19	32.82	0.07
	Scraper	133,797	14,771,217	32,565	0.53	58.58	0.13	0.61	67.42	0.15	3.04	335.88	0.74

Activity 3: Drill Pad Drilling		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,856,318	15,116	0.03	1,034	2.28	8.40E-03	307.98	0.68	2.30E-03	84.48	0.19
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	1.25	2.75E-03
Construction Equipment (Drill Rig)	Generator	148,388	106,839,491	235,541	1.00	722.78	1.59	4.58	3,298	7.27	0.89	639.77	1.41

Activity 4: Drill Pad Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,284,958	13,856	0.03	947.79	2.09	8.40E-03	282.32	0.62	2.30E-03	77.44	0.17
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	1.25	2.75E-03
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89	586.46	1.29
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 3 Flowline Construction

Total Miles **2.25**

Activity 1: Clearing ROW

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						16	1	100	6.11	44,017	97.04	0.42	3,053	6.73
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						16	2	100	1.65	5,284	11.65	4.58	14,662	32.32
Construction Equipment	Backhoe				0.00E+00	0.00E+00									
	Blade	260.00	2.0	2.00	4.50	54.02				4.95	267.42	0.59	20.71	1,119	2.47
	Dozer	240.00	8.0	2.00	4.50	54.02				5.30	286.29	0.63	21.66	1,170	2.58
	Water Truck	185.00	6.0	2.00	4.50	54.02				2.80	151.52	0.33	16.14	871.99	1.92

Activity 2: Trenching

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						15	1	100	6.11	20,633	45.49	0.42	1,431	3.16
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						15	2	100	1.65	4,953	10.92	4.58	13,746	30.30
Construction Equipment	Backhoe	110.00	1.0	1.00	2.25	27.01				27.40	740.10	1.63	41.31	1,116	2.46
	Excavator	236.00	11.0	1.00	2.25	27.01				4.15	111.98	0.25	18.73	506.00	1.12
	Trencher	420.00	3.0	1.00	2.25	27.01				157.78	4,532	9.99	342.02	9,238	20.37

Activity 3: Stringing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						10	1	100	6.11	13,755	30.33	0.42	954.20	2.10
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Excavator w/ Vacculift	428.00	2.0	1.00	2.25	27.01				26.24	708.74	1.56	65.08	1,758	3.88
	RT Forklift	65.00	2.0	1.00	2.25	27.01				12.90	348.34	0.77	95.48	2,579	5.69
	Generator	50.00	2.0	1.00	2.25	27.01				5.34	144.18	0.32	48.26	1,304	2.87
	Skid Truck	185.00	2.0	1.00	2.25	27.01				2.80	75.76	0.17	16.14	436.00	0.96
	Water Truck	185.00	2.0	1.00	2.25	27.01				2.80	75.76	0.17	16.14	436.00	0.96

Activity 4: Welding and Lower In

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						54	1	100	6.11	74,279	163.76	0.42	5,153	11.36
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						41	2	100	1.65	13,539	29.85	4.58	37,572	82.83
Construction Equipment	Backhoe	110.00	2.0	1.00	2.25	27.01				27.40	740.10	1.63	41.31	1,116	2.46
	Blade	200.00	2.0	1.00	2.25	27.01				4.95	133.71	0.29	20.71	559.37	1.23
	RT Crane	185.00	2.0	1.00	2.25	27.01				7.29	196.95	0.43	27.67	747.33	1.65
	Dozer	240.00	2.0	1.00	2.25	27.01				5.30	143.14	0.32	21.66	584.95	1.29
	Excavator	236.00	2.0	1.00	2.25	27.01				4.15	111.98	0.25	18.73	506.00	1.12
	RT Forklift	65.00	2.0	1.00	2.25	27.01				12.90	348.34	0.77	95.48	2,579	5.69
	Generator	50.00	2.0	1.00	2.25	27.01				5.34	144.18	0.32	48.26	1,304	2.87
	Sideboom	305.00	10.0	1.00	2.25	27.01				38.89	1,050	2.32	129.26	3,492	7.70
	Skid Truck	185.00	2.0	1.00	2.25	27.01				2.80	75.76	0.17	16.14	436.00	0.96
	Tack Rig	255.00	2.0	1.00	2.25	27.01				5.30	143.14	0.32	21.66	584.95	1.29
	Water Truck	185.00	2.0	1.00	2.25	27.01				2.80	75.76	0.17	16.14	436.00	0.96
	Welding Machine	35.00	14.0	1.00	2.25	27.01				5.79	156.41	0.34	51.09	1,380	3.04
	Welding Truck	300.00	10.0	1.00	2.25	27.01				2.80	75.76	0.17	16.14	436.00	0.96

Denbury Snowy River CO2 Project Emissions
Group 3 Flowline Construction

Total Miles 2.25

Activity 1: Clearing ROW		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,210	2.67	0.14	990.65	2.18	0.05	345.75	0.76	0.29	2,099	4.63
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	463.26	1.02	0.09	274.69	0.61	0.01	47.68	0.11	0.41	1,296	2.86
Construction Equipment	Backhoe												
	Blade	1.30	70.42	0.16	1.26	68.30	0.15	0.19	10.47	0.02	1.65	89.13	0.20
	Dozer	1.38	74.45	0.16	1.34	72.22	0.16	0.20	10.67	0.02	1.72	92.97	0.20
	Water Truck	0.92	49.85	0.11	0.89	48.35	0.11	0.20	11.01	0.02	1.37	74.19	0.16

Activity 2: Trenching		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	567.01	1.25	0.14	464.37	1.02	0.05	162.07	0.36	0.29	983.91	2.17
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	434.31	0.96	0.09	257.52	0.57	0.01	44.70	0.10	0.41	1,215	2.68
Construction Equipment	Backhoe	6.46	174.53	0.38	6.27	169.30	0.37	0.05	1.29	2.85E-03	6.65	179.68	0.40
	Excavator	1.16	31.29	0.07	1.12	30.35	0.07	0.20	5.27	0.01	1.54	41.60	0.09
	Trencher	27.66	747.07	1.65	26.83	724.65	1.60	0.40	10.82	0.02	23.86	644.37	1.42

Activity 3: Stringing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	378.01	0.83	0.14	309.58	0.68	0.05	108.05	0.24	0.29	655.94	1.45
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Excavator w/ Vacculift	5.40	145.86	0.32	5.24	141.48	0.31	0.35	9.47	0.02	5.07	136.88	0.30
	RT Forklift	1.43	38.55	0.08	1.38	37.39	0.08	0.06	1.58	3.48E-03	2.57	69.46	0.15
	Generator	0.40	10.83	0.02	0.39	10.51	0.02	0.03	0.80	1.76E-03	1.77	47.76	0.11
	Skid Truck	0.92	24.92	0.05	0.89	24.18	0.05	0.20	5.50	0.01	1.37	37.09	0.08
	Water Truck	0.92	24.92	0.05	0.89	24.18	0.05	0.20	5.50	0.01	1.37	37.09	0.08

Activity 4: Welding and Lower In		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	2,041	4.50	0.14	1,672	3.69	0.05	583.46	1.29	0.29	3,542	7.81
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	1,187	2.62	0.09	703.89	1.55	0.01	122.18	0.27	0.41	3,322	7.32
Construction Equipment	Backhoe	6.46	174.53	0.38	6.27	169.30	0.37	0.05	1.29	2.85E-03	6.65	179.68	0.40
	Blade	1.30	35.21	0.08	1.26	34.15	0.08	0.19	5.23	0.01	1.65	44.56	0.10
	RT Crane	1.70	45.91	0.10	1.65	44.53	0.10	0.15	3.95	8.72E-03	2.29	61.79	0.14
	Dozer	1.38	37.22	0.08	1.34	36.11	0.08	0.20	5.33	0.01	1.72	46.48	0.10
	Excavator	1.16	31.29	0.07	1.12	30.35	0.07	0.20	5.27	0.01	1.54	41.60	0.09
	RT Forklift	1.43	38.55	0.08	1.38	37.39	0.08	0.06	1.58	3.48E-03	2.57	69.46	0.15
	Generator	0.40	10.83	0.02	0.39	10.51	0.02	0.03	0.80	1.76E-03	1.77	47.76	0.11
	Sideboom	6.83	184.41	0.41	6.62	178.88	0.39	0.27	7.23	0.02	8.67	234.14	0.52
	Skid Truck	0.92	24.92	0.05	0.89	24.18	0.05	0.20	5.50	0.01	1.37	37.09	0.08
	Tack Rig	1.38	37.22	0.08	1.34	36.11	0.08	0.20	5.33	0.01	1.72	46.48	0.10
	Water Truck	0.92	24.92	0.05	0.89	24.18	0.05	0.20	5.50	0.01	1.37	37.09	0.08
	Welding Machine	0.45	12.26	0.03	0.44	11.89	0.03	0.03	0.86	1.89E-03	1.88	50.75	0.11
	Welding Truck	0.92	24.92	0.05	0.89	24.18	0.05	0.20	5.50	0.01	1.37	37.09	0.08

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Total Miles 2.25

Activity 1: Clearing ROW		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,346,994	2,970	0.03	203.13	0.45	8.40E-03	60.51	0.13	2.30E-03	16.60	0.04
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	695,862	1,534	0.46	1,483	3.27	2.00E-03	6.40	0.01	3.77E-03	12.08	0.03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	73,223	3,955,786	8,721	0.09	4.76	0.01	0.40	21.44	0.05	0.74	39.80	0.09
	Dozer	74,585	4,029,356	8,883	0.09	5.06	0.01	0.37	19.79	0.04	1.89	102.12	0.23
	Water Truck	77,373	4,179,988	9,215	0.05	2.85	6.29E-03	0.28	15.26	0.03	6.73	363.61	0.80

Activity 2: Trenching		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	631,404	1,392	0.03	95.22	0.21	8.40E-03	28.36	0.06	2.30E-03	7.78	0.02
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	652,370	1,438	0.46	1,390	3.06	2.00E-03	6.00	0.01	3.77E-03	11.32	0.02
Construction Equipment	Backhoe	15,862	428,465	944.60	0.44	11.98	0.03	0.17	4.54	0.01	3.02	81.50	0.18
	Excavator	73,888	1,995,869	4,400	0.07	2.01	4.42E-03	0.36	9.73	0.02	0.82	22.20	0.05
	Trencher	131,248	3,545,267	7,816	1.60	43.17	0.10	0.64	17.32	0.04	1.68	45.49	0.10

Activity 3: Stringing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	420,936	928.00	0.03	63.48	0.14	8.40E-03	18.91	0.04	2.30E-03	5.19	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Excavator w/ Vacculift	130,035	3,512,491	7,744	0.34	9.16	0.02	0.65	17.65	0.04	0.82	22.20	0.05
	RT Forklift	21,596	583,338	1,286	0.37	9.92	0.02	0.10	2.68	5.91E-03	1.22	32.94	0.07
	Generator	11,243	303,700	669.54	0.24	6.38	0.01	0.08	2.06	4.55E-03	0.89	24.00	0.05
	Skid Truck	77,373	2,089,994	4,608	0.05	1.43	3.14E-03	0.28	7.63	0.02	6.73	181.80	0.40
	Water Truck	77,373	2,089,994	4,608	0.05	1.43	3.14E-03	0.28	7.63	0.02	6.73	181.80	0.40

Activity 4: Welding and Lower In		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	2,273,053	5,011	0.03	342.78	0.76	8.40E-03	102.11	0.23	2.30E-03	28.01	0.06
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	1,783,145	3,931	0.46	3,800	8.38	2.00E-03	16.40	0.04	3.77E-03	30.95	0.07
Construction Equipment	Backhoe	15,862	428,465	944.60	0.44	11.98	0.03	0.17	4.54	0.01	3.02	81.50	0.18
	Blade	73,223	1,977,893	4,361	0.09	2.38	5.24E-03	0.31	8.25	0.02	0.74	19.90	0.04
	RT Crane	54,272	1,465,985	3,232	0.15	4.10	0.01	0.28	7.63	0.02	1.75	47.17	0.10
	Dozer	74,585	2,014,678	4,442	0.09	2.53	5.58E-03	0.37	9.90	0.02	1.89	51.06	0.11
	Excavator	73,888	1,995,869	4,400	0.07	2.01	4.42E-03	0.36	9.73	0.02	0.82	22.20	0.05
	RT Forklift	21,596	583,338	1,286	0.37	9.92	0.02	0.10	2.68	5.91E-03	1.22	32.94	0.07
	Generator	11,243	303,700	669.54	0.24	6.38	0.01	0.08	2.06	4.55E-03	0.89	24.00	0.05
	Sideboom	94,055	2,540,601	5,601	0.64	17.18	0.04	0.47	12.58	0.03	1.75	47.17	0.10
	Skid Truck	77,373	2,089,994	4,608	0.05	1.43	3.14E-03	0.28	7.63	0.02	6.73	181.80	0.40
	Tack Rig	74,585	2,014,678	4,442	0.09	2.53	5.58E-03	0.39	10.52	0.02	1.89	51.06	0.11
	Water Truck	77,373	2,089,994	4,608	0.05	1.43	3.14E-03	0.28	7.63	0.02	6.73	181.80	0.40
	Welding Machine	12,003	324,211	714.76	0.25	6.77	0.01	0.05	1.44	3.18E-03	7.84	211.81	0.47
	Welding Truck	77,373	2,089,994	4,608	0.05	1.43	3.14E-03	0.46	12.37	0.03	6.73	181.80	0.40

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Activity 5: X Ray										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	4,889	10.78	0.42	339.12	0.75
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Generator	10.00	4.0	0.33	0.74	8.91				10.10	90.05	0.20	17.23	153.59	0.34
	X-Ray Truck	100.00	4.0	0.33	0.74	8.91				2.80	25.00	0.06	16.14	143.88	0.32

Activity 6: Testing										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	3,666	8.08	0.42	254.34	0.56
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04
Construction Equipment	Air Compressor/Dryer	400.00	2.0	0.10	0.23	2.70				37.95	102.51	0.23	140.25	378.85	0.84
	RT Forklift	65.00	2.0	0.10	0.23	2.70				12.90	34.83	0.08	95.48	257.92	0.57
	Generator	50.00	2.0	0.10	0.23	2.70				5.34	14.42	0.03	48.26	130.36	0.29

Activity 7: Backfill										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	12,380	27.29	0.42	858.78	1.89
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	260.00	2.0	1.00	2.25	27.01				4.95	133.71	0.29	20.71	559.37	1.23
	Dozer	240.00	2.0	1.00	2.25	27.01				5.30	143.14	0.32	21.66	584.95	1.29
	Excavator	236.00	2.0	1.00	2.25	27.01				4.15	111.98	0.25	18.73	506.00	1.12
	Generator	50.00	1.0	1.00	2.25	27.01				5.34	144.18	0.32	48.26	1,304	2.87
	Roller	145.00	2.0	1.00	2.25	27.01				10.67	288.23	0.64	25.19	680.45	1.50

Activity 8: Corrosion Protection										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						5	1	100	6.11	3,055	6.74	0.42	211.95	0.47
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Air Compressor	85.00	2.0	0.33	0.74	8.91				9.84	87.72	0.19	43.11	384.24	0.85
	Generator	10.00	1.0	0.33	0.74	8.91				10.10	90.05	0.20	17.23	153.59	0.34
	Paint Truck	185.00	2.0	0.33	0.74	8.91				2.80	25.00	0.06	16.14	143.88	0.32

Activity 9: Reclaim										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	33,013	72.78	0.42	2,290	5.05
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Backhoe	110.00	4.0	2.00	4.50	54.02				27.40	1,480	3.26	41.31	2,231	4.92
	Blade	200.00	4.0	2.00	4.50	54.02				4.95	267.42	0.59	20.71	1,119	2.47
	Farm Tractor	190.00	4.0	2.00	4.50	54.02				2.80	151.52	0.33	16.14	871.99	1.92

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Activity 5: X Ray		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	134.34	0.30	0.14	110.02	0.24	0.05	38.40	0.08	0.29	233.12	0.51
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Generator	0.98	8.69	0.02	0.95	8.43	0.02	8.91E-03	0.08	1.75E-04	3.45	30.74	0.07
	X-Ray Truck	0.92	8.22	0.02	0.89	7.98	0.02	0.20	1.82	4.00E-03	1.37	12.24	0.03

Activity 6: Testing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	100.76	0.22	0.14	82.52	0.18	0.05	28.80	0.06	0.29	174.84	0.39
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36
Construction Equipment	Air Compressor/Dryer	6.17	16.68	0.04	5.99	16.18	0.04	0.25	0.68	1.50E-03	8.14	21.99	0.05
	RT Forklift	1.43	3.85	8.50E-03	1.38	3.74	8.24E-03	0.06	0.16	3.48E-04	2.57	6.95	0.02
	Generator	0.40	1.08	2.39E-03	0.39	1.05	2.32E-03	0.03	0.08	1.76E-04	1.77	4.78	0.01

Activity 7: Backfill		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	340.21	0.75	0.14	278.62	0.61	0.05	97.24	0.21	0.29	590.35	1.30
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	35.21	0.08	1.26	34.15	0.08	0.19	5.23	0.01	1.65	44.56	0.10
	Dozer	1.38	37.22	0.08	1.34	36.11	0.08	0.20	5.33	0.01	1.72	46.48	0.10
	Excavator	1.16	31.29	0.07	1.12	30.35	0.07	0.20	5.27	0.01	1.54	41.60	0.09
	Generator	0.40	10.83	0.02	0.39	10.51	0.02	0.03	0.80	1.76E-03	1.77	47.76	0.11
	Roller	2.72	73.46	0.16	2.64	71.26	0.16	0.11	3.05	6.72E-03	1.67	45.09	0.10

Activity 8: Corrosion Protection		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	83.97	0.19	0.14	68.77	0.15	0.05	24.00	0.05	0.29	145.70	0.32
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Air Compressor	1.74	15.50	0.03	1.69	15.04	0.03	0.06	0.53	1.17E-03	1.14	10.18	0.02
	Generator	0.98	8.69	0.02	0.95	8.43	0.02	8.91E-03	0.08	1.75E-04	3.45	30.74	0.07
	Paint Truck	0.92	8.22	0.02	0.89	7.98	0.02	0.20	1.82	4.00E-03	1.37	12.24	0.03

Activity 9: Reclaim		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	907.22	2.00	0.14	742.99	1.64	0.05	259.31	0.57	0.29	1,574	3.47
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Backhoe	6.46	349.07	0.77	6.27	338.60	0.75	0.05	2.59	5.71E-03	6.65	359.35	0.79
	Blade	1.30	70.42	0.16	1.26	68.30	0.15	0.19	10.47	0.02	1.65	89.13	0.20
	Farm Tractor	0.92	49.85	0.11	0.89	48.35	0.11	0.20	11.01	0.02	1.37	74.19	0.16

Denbury Snowy River CO2 Project Emissions
Group 3 Flowline Construction

Activity 5: X Ray		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	149,600	329.81	0.03	22.56	0.05	8.40E-03	6.72	0.01	2.30E-03	1.84	4.06E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Generator	2,422	21,590	47.60	0.30	2.71	5.97E-03	0.02	0.14	3.00E-04	0.89	7.92	0.02
	X-Ray Truck	77,373	689,698	1,521	0.05	0.47	1.04E-03	0.15	1.36	3.00E-03	6.73	60.00	0.13

Activity 6: Testing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	112,200	247.36	0.03	16.92	0.04	8.40E-03	5.04	0.01	2.30E-03	1.38	3.05E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	86,983	191.76	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Air Compressor/Dryer	88,895	240,123	529.38	0.62	1.68	3.70E-03	0.61	1.65	3.64E-03	0.89	2.40	5.29E-03
	RT Forklift	21,596	58,334	128.60	0.37	0.99	2.19E-03	0.10	0.27	5.91E-04	1.22	3.29	7.26E-03
	Generator	11,243	30,370	66.95	0.24	0.64	1.41E-03	0.08	0.21	4.55E-04	0.89	2.40	5.29E-03

Activity 7: Backfill		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	378,842	835.20	0.03	57.13	0.13	8.40E-03	17.02	0.04	2.30E-03	4.67	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	1,977,893	4,361	0.09	2.38	5.24E-03	0.40	10.72	0.02	0.74	19.90	0.04
	Dozer	74,585	2,014,678	4,442	0.09	2.53	5.58E-03	0.37	9.90	0.02	1.89	51.06	0.11
	Excavator	73,888	1,995,869	4,400	0.07	2.01	4.42E-03	0.36	9.73	0.02	0.82	22.20	0.05
	Generator	11,243	303,700	669.54	0.24	6.38	0.01	0.08	2.06	4.55E-03	0.89	24.00	0.05
	Roller	41,867	1,130,907	2,493	0.13	3.60	7.94E-03	0.22	5.98	0.01	1.19	32.12	0.07

Activity 8: Corrosion Protection		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	93,500	206.13	0.03	14.10	0.03	8.40E-03	4.20	0.01	2.30E-03	1.15	2.54E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Air Compressor	21,856	194,827	429.52	0.10	0.85	1.88E-03	0.13	1.16	2.55E-03	0.89	7.92	0.02
	Generator	2,422	21,590	47.60	0.30	2.71	5.97E-03	0.02	0.14	3.00E-04	0.89	7.92	0.02
	Paint Truck	77,373	689,698	1,521	0.05	0.47	1.04E-03	0.28	2.52	5.55E-03	6.73	60.00	0.13

Activity 9: Reclaim		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,010,246	2,227	0.03	152.35	0.34	8.40E-03	45.38	0.10	2.30E-03	12.45	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Backhoe	15,862	856,931	1,889	0.44	23.96	0.05	0.17	9.07	0.02	3.02	162.99	0.36
	Blade	73,223	3,955,786	8,721	0.09	4.76	0.01	0.31	16.50	0.04	0.74	39.80	0.09
	Farm Tractor	77,373	4,179,988	9,215	0.05	2.85	6.29E-03	0.29	15.67	0.03	6.73	363.61	0.80

Denbury Snowy River CO2 Project Emissions
Group 3 Road Maintenance and Construction

New Roads

Miles 0.81

Activity 1: Road Clear

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	8,910	19.64	0.42	618.05	1.36
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor/Dryer				—	—									
	Blade	300.00	3.00	2.00	1.62	19.44				4.95	96.23	0.21	20.71	402.57	0.89
	Dozer	400.00	3.00	2.00	1.62	19.44				41.39	804.53	1.77	98.38	1,912	4.22
	Scraper	400.00	3.00	2.00	1.62	19.44				43.35	842.66	1.86	102.59	1,994	4.40

Activity 2: Road Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	11,879	26.19	0.42	824.06	1.82
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	300.00	2.00	2.00	1.62	19.44				4.95	96.23	0.21	20.71	402.57	0.89
	Dozer	400.00	3.00	2.00	1.62	19.44				41.39	804.53	1.77	98.38	1,912	4.22
	Dump Truck	350.00	4.00	2.00	1.62	19.44				7.76	150.89	0.33	33.63	653.76	1.44
	Scraper	400.00	3.00	2.00	1.62	19.44				43.35	842.66	1.86	102.59	1,994	4.40

Two-Tracks Road Modifications

Miles 7.36

Activity 1: Road Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	107,941	237.97	0.42	7,488	16.51
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						12	2	100	1.65	3,963	8.74	4.58	10,997	24.24
Construction Equipment	Blade	300.00	2.00	2.00	14.72	176.64				4.95	874.36	1.93	20.71	3,658	8.06
	Dozer	400.00	3.00	2.00	14.72	176.64				41.39	7,310	16.12	98.38	17,377	38.31
	Dump Truck	350.00	4.00	2.00	14.72	176.64				7.76	1,371	3.02	33.63	5,940	13.10
	Scraper	400.00	3.00	2.00	14.72	176.64				43.35	7,657	16.88	102.59	18,121	39.95

Existing Roads

Miles —

Activity 1: Road Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						2	1	100	6.11	—	—	0.42	—	—
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	—	—	4.58	—	—
Construction Equipment	Blade	300.00	2.00	2.00	—	—				4.95	—	—	20.71	—	—

Denbury Snowy River CO2 Project Emissions
Group 3 Road Maintenance and Construction

New Roads

Miles 0.81

Activity 1: Road Clear		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	244.84	0.54	0.14	200.52	0.44	0.05	69.98	0.15	0.29	424.86	0.94
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor/Dryer												
	Blade	1.30	25.34	0.06	1.26	24.58	0.05	0.19	3.77	8.30E-03	1.65	32.07	0.07
	Dozer	7.76	150.91	0.33	7.53	146.38	0.32	0.37	7.17	0.02	7.10	137.98	0.30
	Scraper	8.06	156.61	0.35	7.81	151.91	0.33	0.37	7.13	0.02	7.34	142.70	0.31

Activity 2: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	326.46	0.72	0.14	267.36	0.59	0.05	93.31	0.21	0.29	566.48	1.25
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	25.34	0.06	1.26	24.58	0.05	0.19	3.77	8.30E-03	1.65	32.07	0.07
	Dozer	7.76	150.91	0.33	7.53	146.38	0.32	0.37	7.17	0.02	7.10	137.98	0.30
	Dump Truck	2.08	40.37	0.09	2.01	39.16	0.09	0.35	6.83	0.02	2.72	52.85	0.12
	Scraper	8.06	156.61	0.35	7.81	151.91	0.33	0.37	7.13	0.02	7.34	142.70	0.31

Two-Tracks Road Modifications

Miles 7.36

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	2,966	6.54	0.14	2,429	5.36	0.05	847.87	1.87	0.29	5,147	11.35
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	347.45	0.77	0.09	206.02	0.45	0.01	35.76	0.08	0.41	972.24	2.14
Construction Equipment	Blade	1.30	230.23	0.51	1.26	223.33	0.49	0.19	34.23	0.08	1.65	291.42	0.64
	Dozer	7.76	1,371	3.02	7.53	1,330	2.93	0.37	65.11	0.14	7.10	1,254	2.76
	Dump Truck	2.08	366.78	0.81	2.01	355.78	0.78	0.35	62.05	0.14	2.72	480.25	1.06
	Scraper	8.06	1,423	3.14	7.81	1,380	3.04	0.37	64.83	0.14	7.34	1,297	2.86

Existing Roads

Miles —

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	—	—	0.14	—	—	0.05	—	—	0.29	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	—	—	0.09	—	—	0.01	—	—	0.41	—	—
Construction Equipment	Blade	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—

Denbury Snowy River CO2 Project Emissions
Group 3 Road Maintenance and Construction

New Roads

Miles 0.81

Activity 1: Road Clear		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	272,646	601.08	0.03	41.12	0.09	8.40E-03	12.25	0.03	2.30E-03	3.36	7.41E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	6.79	0.01
Construction Equipment	Air Compressor/Dryer							—	—	—	—	—	—
	Blade	73,223	1,423,455	3,138	0.09	1.71	3.77E-03	0.46	8.90	0.02	0.74	14.32	0.03
	Dozer	134,685	2,618,279	5,772	0.51	9.90	0.02	0.61	11.87	0.03	1.89	36.75	0.08
	Scraper	133,797	2,601,019	5,734	0.53	10.32	0.02	0.61	11.87	0.03	3.04	59.14	0.13

Activity 2: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	363,528	801.44	0.03	54.82	0.12	8.40E-03	16.33	0.04	2.30E-03	4.48	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	1,423,455	3,138	0.09	1.71	3.77E-03	0.46	8.90	0.02	0.74	14.32	0.03
	Dozer	134,685	2,618,279	5,772	0.51	9.90	0.02	0.61	11.87	0.03	1.89	36.75	0.08
	Dump Truck	132,987	2,585,258	5,700	0.13	2.51	5.54E-03	0.53	10.39	0.02	6.73	130.84	0.29
	Scraper	133,797	2,601,019	5,734	0.53	10.32	0.02	0.61	11.87	0.03	3.04	59.14	0.13

Two-Tracks Road Modifications

Miles 7.36

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	3,303,168	7,282	0.03	498.12	1.10	8.40E-03	148.38	0.33	2.30E-03	40.70	0.09
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	521,896	1,151	0.46	1,112	2.45	2.00E-03	4.80	0.01	3.77E-03	9.06	0.02
Construction Equipment	Blade	73,223	12,934,108	28,515	0.09	15.55	0.03	0.46	80.90	0.18	0.74	130.14	0.29
	Dozer	134,685	23,790,780	52,450	0.51	89.94	0.20	0.61	107.87	0.24	1.89	333.89	0.74
	Dump Truck	132,987	23,490,738	51,788	0.13	22.84	0.05	0.53	94.39	0.21	6.73	1,189	2.62
	Scraper	133,797	23,633,947	52,104	0.53	93.73	0.21	0.61	107.87	0.24	3.04	537.41	1.18

Existing Roads

Miles —

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	—	—	0.03	—	—	8.40E-03	—	—	2.30E-03	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	—	—	0.46	—	—	2.00E-03	—	—	3.77E-03	—	—
Construction Equipment	Blade	73,223	—	—	0.09	—	—	0.46	—	—	0.74	—	—

Denbury Snowy River CO2 Project Emissions
Group 3 Fugitive Dust Emissions from Paved Roads

Summary of Fugitive Emissions

Paved Roads emission factor from AP-42, Section 13.2.1: *Paved Roads* (01/11)

$$E = k(sL)^{0.91}(W)^{1.02}(1-P/(4*365))$$

where:

sL =	0.6	road surface silt loading silt loading (g/m2) [Table 13.2.1-2, for Ubiquitous Baseline, <500]
W_{LDT} =	4	tons [Average vehicle weight]
$W_{Tractor}$ =	25	tons [Average vehicle weight]
k =	0.0022	lb/VMT [Table 13.2.1-1, for PM_{10}]
k =	0.00054	lb/VMT [Table 13.2.1-1, for $PM_{2.5}$]
P =	100	days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.1-2]

1/2 Ton Trucks (light-duty trucks)

$E_{(PM10)}$ =	5.29E-03	lb/VMT
$E_{(PM2.5)}$ =	1.30E-03	lb/VMT
	126	Duration of Construction (days)-Well Pad Construction
	20	Duration of Construction (days)-Flow/Bulk Line Construction
	0	Duration of Construction (days)-Pump Station Construction
	15	Duration of Construction (days)-Road Construction (existing and two-track roads)

Tractor Trailers

$E_{(PM10)}$ =	0.03	lb/VMT
$E_{(PM2.5)}$ =	0.01	lb/VMT
	2.0000	Equipment Delivery (days) -Well Pad Construction
	2.0000	Equipment Delivery (days) -Flow/Bulk Line Construction
	0.0000	Equipment Delivery (days) -Pump Station Construction
	2.0000	Equipment Delivery (days) -Road Construction (existing and two-track roads)

Project Segment

Equipment Type	Average Vehicle Weight (tons)[a]	Well Pad Construction			Flow/Bulk Line Construction			Pump Station Construction			Road Construction		
		VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]
Light Duty Trucks	4	100	22	277288	100	135	266202	100	0	0	100	12	17664
Tractor Trailers	25	100	21	4200	100	106	21200	100	0	0	100	12	2400
Total VMT				281488			287402			0			20064
a - Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.													
PM10 (tons)				**0.81**			**1.07**			**0.00**			**0.09**
PM2.5 (tons)				**0.20**			**0.26**			**0.00**			**0.02**

Project Totals

Total Paved Road Emissions	
Pollutant	**tons**
PM_{10}	**1.96**
$PM_{2.5}$	**0.48**

[a] *Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.*

[b] VMT per day are projected based on experience from previous construction projects.

[c] Vehicle Miles Traveled (VMT) are based on the vehicle quantity , project duration, and experience from previous construction projects.

Denbury Snowy River CO2 Project Emissions
Group 3 Fugitive Dust Emissions from Unpaved Roads

Summary of Fugitive Emissions

Unpaved Roads emission factor from AP-42, Section 13.2.2: *Unpaved Roads* (11/06); Equations a1 and 2

$$E = k\,(s/12)^a (W/3)^b \qquad (1a)$$

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight

Table 13.2.2-2 - Constants for Equation 1a

Constant	PM2.5	PM10
k (lb/VMT)	0.15	1.5
a	0.9	0.9
b	0.45	0.45

Surface Silt (s) content based on Table 13.2.2-1 - construction sites

s = 8.50

$$E_{ext} = E\,[(365 - P)/365] \qquad (2)$$

E_{ext} = annual size-specific emisison factor extrapolated for natural mitigation, lb/VMT

E = emisison factor from Equation 1a

P = days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.2-1

P = 100

Equipment	Construction Duration (days)	Miles per Day	Quantity	Total Vehicle Miles Traveled[a] (VMT)	W: Mean Vehicle Weight (tons)[b]	Emission Factors (lb/VMT)[c]		Emissions (tons)		Controlled Emissions (tons)	
						PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Well Pad Construction											
1/2 Ton Trucks	5.24	100	0	9,404	12.02941176	1.492	0.149	7.014	0.701	3.5	0.4
							Total (tons)	**7.014**	**0.701**	**3.5**	**0.4**

(a) VMT per day are projected based on experience from previous construction projects
(b) Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.
(c) AP 42 Section 13.2.2 Unpaved Roads, dated November 2006, Equations 1a and 2

Denbury Snowy River CO2 Project Emissions
Group 3 Fugitive Dust Emissions from Earthmoving Activities

Construction Activity	Activity Type	Approximate Pipeline Length or Road Length (mi)	Excavation Volume[a] (ft^3)	Temporary Workspace for Construction (acres)[b]
Flowline Injection Well 07	Pipeline	2.25	213,934	1.64
BLM Two-Track Injection Well 06	Access Roads	4.14	655,776	15.05
BLM Two-Track Injection Well 07	Access Roads	3.22	510,048	11.71
New Road Injection Well 06	Access Roads	0.78	123,552	2.84
New Road Injection Well 07	Access Roads	0.03	4,752	0.11
Injection Well 06 Construction Pad	Well Pad Construction	--	601,128	4.6
Injection Well 07 Construction Pad	Well Pad Construction	--	601128	4.6

Project Construction Activity Particulate Matter Emissions

Construction Activity	Excavation[a] (tons)	Excavation PM_{10} Emission Factor[c] (lb/ton)	Pipeline Excavation PM_{10} Emissions (tons)	Backfilling[a] (tons)	Backfilling PM_{10} Emission Factor[b] (lb/ton)	Backfilling PM10 Emissions (tpy)	Windblown Dust Area (acre)	PM_{10} Windblown Dust Emission Factor[d,e] (tons/acre)	Windblown Dust PM_{10} Emissions - Uncontrolled (tons)	Total Construction Activity PM_{10} emissions (tons)	Total Controlled Construction Activity PM_{10} emissions[g] (tons)	Total Construction Activity $PM_{2.5}$ emissions[f] (tons)	Total Controlled Construction Activity $PM_{2.5}$ emissions[g] (tons)
Flowline Injection Well 07	10,697	0.058	0.310	10,697	0.012	0.064	1.6	3.80E-01	0.62	0.996	0.498	0.207	0.104
BLM Two-Track Injection Well 06	32,789	0.058	0.951	32,789	0.012	0.197	15.1	3.80E-01	5.72	6.868	3.434	1.429	0.714
BLM Two-Track Injection Well 07	25,502	0.058	0.740	25,502	0.012	0.153	11.7	3.80E-01	4.45	5.342	2.671	1.111	0.556
New Road Injection Well 06	6,178	0.058	0.179	6,178	0.012	0.037	2.8	3.80E-01	1.08	1.294	0.647	0.269	0.135
New Road Injection Well 07	238	0.058	0.007	238	0.012	0.001	0.1	3.80E-01	0.04	0.050	0.025	0.010	0.005
Injection Well 06 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
Injection Well 07 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
									Total	**5.650**	**2.825**	**1.175**	**0.588**

(a) Excavation of well pad sites assumed to be 3 feet deep. Excavation and backfilling assumes pipeline will be 6 ft x 3 ft x approximate length (ft) for the Project component. Excavation for road construction assumes road excavation is 30 ft width x 1 ft deep x approximate road length (ft). Soil density is assumed to be 100 lb/ft^3

(b) Temporary workspace acres for roadways assumed to be 30 ft width x approximate road length (mi).

(c) Excavation and backfilling factors from AP-42, Table 11.9-4 (dated 7/98), assuming 100% of TSP is PM_{10}

(d) Windblown dust factor from AP-42 Table 11.9-4 Uncontrolled Particulate Emission Factors for Open Dust Sources

(e) PM_{10} emissions are conservatively assumed to be 100% of TSP.

(f) $PM_{2.5}$ emissions were calculated following the SCAQMD Particulate Matter $PM_{2.5}$ Significance Thresholds and Calculation Methodology (2006). For construction and demolition fugitive dust sources, 20.8% of the PM_{10} would be $PM_{2.5}$

(g) Controls are conservatively assumed to have a 50% reduction factor based on Emission Factors for Paved and Unpaved Roads (1/2015) Utah DEQ

Denbury Snowy River CO2 Project Emissions
Construction Group 4 Emissions Summary

Uncontrolled Emissions Summary (U.S. Tons Total)

Category	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-year GWP CO_2e	100- year GWP CO_2e	HAPS
Well Construction	0.65	0.41	0.03	0.03	4.89E-03	0.05	298.91	6.18E-03	5.08E-03	300.81	300.48	5.69E-03
Flow/Bulk Line Construction	0.51	0.23	0.02	0.02	4.17E-03	0.04	157.47	0.01	1.31E-03	158.92	158.22	6.75E-03
Road Construction	0.10	0.06	5.35E-03	4.54E-03	8.88E-04	8.42E-03	59.36	3.09E-03	3.85E-04	59.72	59.55	1.50E-03
Paved Roads			2.54	0.62								
Unpaved Roads			**2.44**	**0.24**								
Earthmoving			14.78	7.39								
Total	1.26	0.71	**19.82**	**8.31**	0.01	0.09	515.73	0.02	6.78E-03	519.45	518.26	0.01

Controlled Emissions Summary (U.S. Tons Total)

Category	PM_{10}	$PM_{2.5}$
Well Construction	0.03	0.03
Flow/Bulk Line Construction	0.02	0.02
Road Construction	5.35E-03	4.54E-03
Paved Roads	2.54	0.62
Unpaved Roads	1.22	0.12
Earthmoving	7.39	1.54
Controlled Total	11.21	2.34

Denbury Snowy River CO2 Project Emissions
Group 4 Wellpad Construction

Total Acres Disturbed 9.20

Activity 1: Drill Pad Clearing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						3	1	100	6.11	3,373	7.44	0.42	233.99	0.52
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						3	2	100	1.65	990.66	2.18	4.58	2,749	6.06
Construction Equipment	Backhoe					0.00E+00									
	Dozer	153.00	2.00	0.20	1.84	22.08				6.06	133.89	0.30	19.27	425.53	0.94
	Excavator	160.00	1.00	0.20	1.84	22.08				5.28	116.67	0.26	17.08	377.21	0.83

Activity 2: Drill Pad Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	33,732	74.37	0.42	2,340	5.16
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						5	2	100	1.65	1,651	3.64	4.58	4,582	10.10
Construction Equipment	Blade	140.00	1.00	0.25	2.30	27.60				6.09	167.98	0.37	19.47	537.36	1.18
	Dozer	153.00	1.00	1.00	9.20	110.40				6.06	669.43	1.48	19.27	2,128	4.69
	Roller Compactor	156.00	1.00	0.25	2.30	27.60				10.67	294.50	0.65	25.19	695.26	1.53
	Scraper	400.00	3.00	1.00	9.20	110.40				43.35	4,785	10.55	102.59	11,326	24.97

Activity 3: Drill Pad Drilling

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						4.00	1	100	6	224,051	493.95	0.42	15,542	34.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4.00	2	100	2	1,321	2.91	4.58	3,666	8.08
Construction Equipment (Drill Rig)	Generator	3,000	4.00	60.00	60.00	720.00				88	63,515	140.03	234.63	168,931	372.43

Activity 4: Drill Pad Construction

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9.00	1	100	6	205,380	452.79	0.42	14,247	31.41
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9.00	2	100	2	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26	12,594	27.77	65.08	31,241	68.87
	Generator	25.00	3.00	55.00	55.00	660.00				14	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				26	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 4 Wellpad Construction

Total Acres Disturbed 9.20

Activity 1: Drill Pad Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	92.70	0.20	0.14	75.92	0.17	0.05	26.50	0.06	0.29	160.85	0.35
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	86.86	0.19	0.09	51.50	0.11	0.01	8.94	0.02	0.41	243.06	0.54
Construction Equipment	Backhoe												
	Dozer	1.45	31.98	0.07	1.40	31.02	0.07	0.11	2.52	5.56E-03	0.96	21.23	0.05
	Excavator	1.24	27.28	0.06	1.20	26.46	0.06	0.12	2.54	5.61E-03	0.85	18.80	0.04

Activity 2: Drill Pad Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	926.97	2.04	0.14	759.17	1.67	0.05	264.96	0.58	0.29	1,609	3.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	144.77	0.32	0.09	85.84	0.19	0.01	14.90	0.03	0.41	405.10	0.89
Construction Equipment	Blade	1.45	39.96	0.09	1.40	38.76	0.09	0.12	3.26	7.19E-03	0.97	26.71	0.06
	Dozer	1.45	159.90	0.35	1.40	155.10	0.34	0.11	12.62	0.03	0.96	106.15	0.23
	Roller Compactor	2.72	75.06	0.17	2.64	72.81	0.16	0.11	3.11	6.87E-03	1.67	46.07	0.10
	Scraper	8.06	889.39	1.96	7.81	862.70	1.90	0.37	40.52	0.09	7.34	810.38	1.79

Activity 3: Drill Pad Drilling		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	6,157	13.57	0.14	3,301	7.28	0.05	1,760	3.88	0.29	10,684	23.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment (Drill Rig)	Generator	10.64	7,661	16.89	10.32	7,431	16.38	0.42	302.18	0.67	13.21	9,510	20.97

Activity 4: Drill Pad Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	5,644	12.44	0.14	6,808	15.01	0.05	1,613	3.56	0.29	9,794	21.59
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66	1,754	3.87	0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 4 Wellpad Construction

Total Acres Disturbed 9.20

Activity 1: Drill Pad Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	103,224	227.57	0.03	15.57	0.03	8.40E-03	4.64	0.01	2.30E-03	1.27	2.80E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	130,474	287.65	0.46	278.04	0.61	2.00E-03	1.20	2.65E-03	3.77E-03	2.26	4.99E-03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Dozer	43,104	951,739	2,098	0.07	1.65	3.64E-03	0.23	5.16	0.01	1.89	41.74	0.09
	Excavator	43,580	962,237	2,121	0.06	1.41	3.11E-03	0.24	5.39	0.01	0.82	18.15	0.04

Activity 2: Drill Pad Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,032,240	2,276	0.03	155.66	0.34	8.40E-03	46.37	0.10	2.30E-03	12.72	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	217,457	479.41	0.46	463.40	1.02	2.00E-03	2.00	4.41E-03	3.77E-03	3.77	8.32E-03
Construction Equipment	Blade	44,593	1,230,761	2,713	0.07	2.06	4.55E-03	0.21	5.90	0.01	0.74	20.33	0.04
	Dozer	43,104	4,758,694	10,491	0.07	8.25	0.02	0.23	25.79	0.06	1.89	208.68	0.46
	Roller Compactor	41,867	1,155,529	2,548	0.13	3.68	8.11E-03	0.24	6.57	0.01	1.19	32.82	0.07
	Scraper	133,797	14,771,217	32,565	0.53	58.58	0.13	0.61	67.42	0.15	3.04	335.88	0.74

Activity 3: Drill Pad Drilling		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,856,318	15,116	0.03	1,034	2.28	8.40E-03	307.98	0.68	2.30E-03	84.48	0.19
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	1.25	2.75E-03
Construction Equipment (Drill Rig)	Generator	148,388	106,839,491	235,541	1.00	722.78	1.59	4.58	3,298	7.27	0.89	639.77	1.41

Activity 4: Drill Pad Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,284,958	13,856	0.03	947.79	2.09	8.40E-03	282.32	0.62	2.30E-03	77.44	0.17
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	1.25	2.75E-03
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89	586.46	1.29
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 4 Flowline Construction

Total Miles 4.36

Activity 1: Clearing ROW										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)						16	1	100	6.11	85,348	188.16	0.42	5,921	13.05
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						16	2	100	1.65	5,284	11.65	4.58	14,662	32.32
Construction Equipment	Backhoe				0.00E+00	0.00E+00									
	Blade	260.00	2.0	2.00	8.73	104.75				4.95	518.51	1.14	20.71	2,169	4.78
	Dozer	240.00	8.0	2.00	8.73	104.75				5.30	555.11	1.22	21.66	2,268	5.00
	Water Truck	185.00	6.0	2.00	8.73	104.75				2.80	293.79	0.65	16.14	1,691	3.73

Activity 2: Trenching										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)						15	1	100	6.11	40,007	88.20	0.42	2,775	6.12
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						15	2	100	1.65	4,953	10.92	4.58	13,746	30.30
Construction Equipment	Backhoe	110.00	1.0	1.00	4.36	52.38				27.40	1,435	3.16	41.31	2,163	4.77
	Excavator	236.00	11.0	1.00	4.36	52.38				4.15	217.12	0.48	18.73	981.12	2.16
	Trencher	420.00	3.0	1.00	4.36	52.38				167.78	8,788	19.37	342.02	17,913	39.49

Activity 3: Stringing										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)						10	1	100	6.11	26,671	58.80	0.42	1,850	4.08
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Excavator w/ Vacculift	428.00	2.0	1.00	4.36	52.38				26.24	1,374	3.03	65.08	3,409	7.52
	RT Forklift	65.00	2.0	1.00	4.36	52.38				12.90	675.42	1.49	95.48	5,001	11.03
	Generator	50.00	2.0	1.00	4.36	52.38				5.34	279.56	0.62	48.26	2,528	5.57
	Skid Truck	185.00	2.0	1.00	4.36	52.38				2.80	146.90	0.32	16.14	845.38	1.86
	Water Truck	185.00	2.0	1.00	4.36	52.38				2.80	146.90	0.32	16.14	845.38	1.86

Activity 4: Welding and Lower In										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)						54	1	100	6.11	144,025	317.52	0.42	9,991	22.03
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						41	2	100	1.65	13,539	29.85	4.58	37,572	82.83
Construction Equipment	Backhoe	110.00	2.0	1.00	4.36	52.38				27.40	1,435	3.16	41.31	2,163	4.77
	Blade	200.00	2.0	1.00	4.36	52.38				4.95	259.26	0.57	20.71	1,085	2.39
	RT Crane	185.00	2.0	1.00	4.36	52.38				7.29	381.88	0.84	27.67	1,449	3.19
	Dozer	240.00	2.0	1.00	4.36	52.38				5.30	277.55	0.61	21.66	1,134	2.50
	Excavator	236.00	2.0	1.00	4.36	52.38				4.15	217.12	0.48	18.73	981.12	2.16
	RT Forklift	65.00	2.0	1.00	4.36	52.38				12.90	675.42	1.49	95.48	5,001	11.03
	Generator	50.00	2.0	1.00	4.36	52.38				5.34	279.56	0.62	48.26	2,528	5.57
	Sideboom	305.00	10.0	1.00	4.36	52.38				38.89	2,037	4.49	129.26	6,770	14.93
	Skid Truck	185.00	2.0	1.00	4.36	52.38				2.80	146.90	0.32	16.14	845.38	1.86
	Tack Rig	255.00	2.0	1.00	4.36	52.38				5.30	277.55	0.61	21.66	1,134	2.50
	Water Truck	185.00	2.0	1.00	4.36	52.38				2.80	146.90	0.32	16.14	845.38	1.86
	Welding Machine	35.00	14.0	1.00	4.36	52.38				5.79	303.28	0.67	51.09	2,676	5.90
	Welding Truck	300.00	10.0	1.00	4.36	52.38				2.80	146.90	0.32	16.14	845.38	1.86

Denbury Snowy River CO2 Project Emissions
Group 4 Flowline Construction

Total Miles 4.36

Activity 1: Clearing ROW		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	0.17	2,345	5.17	0.14	1,921	4.23	0.05	670.40	1.48	0.29	4,070	8.97
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	463.26	1.02	0.09	274.69	0.61	0.01	47.68	0.11	0.41	1,296	2.86
Construction Equipment	Backhoe												
	Blade	1.30	136.53	0.30	1.26	132.44	0.29	0.19	20.30	0.04	1.65	172.81	0.38
	Dozer	1.38	144.35	0.32	1.34	140.02	0.31	0.20	20.69	0.05	1.72	180.26	0.40
	Water Truck	0.92	96.65	0.21	0.89	93.75	0.21	0.20	21.34	0.05	1.37	143.85	0.32

Activity 2: Trenching		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	0.17	1,099	2.42	0.14	900.40	1.99	0.05	314.25	0.69	0.29	1,908	4.21
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	434.31	0.96	0.09	257.52	0.57	0.01	44.70	0.10	0.41	1,215	2.68
Construction Equipment	Backhoe	6.46	338.42	0.75	6.27	328.27	0.72	0.05	2.51	5.54E-03	6.65	348.39	0.77
	Excavator	1.16	60.67	0.13	1.12	58.85	0.13	0.20	10.22	0.02	1.54	80.66	0.18
	Trencher	27.66	1,449	3.19	26.83	1,405	3.10	0.40	20.97	0.05	23.86	1,249	2.75

Activity 3: Stringing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	0.17	732.95	1.62	0.14	600.27	1.32	0.05	209.50	0.46	0.29	1,272	2.80
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Excavator w/ Vacculift	5.40	282.82	0.62	5.24	274.33	0.60	0.35	18.36	0.04	5.07	265.41	0.59
	RT Forklift	1.43	74.74	0.16	1.38	72.50	0.16	0.06	3.06	6.76E-03	2.57	134.68	0.30
	Generator	0.40	21.00	0.05	0.39	20.37	0.04	0.03	1.55	3.42E-03	1.77	92.61	0.20
	Skid Truck	0.92	48.32	0.11	0.89	46.87	0.10	0.20	10.67	0.02	1.37	71.92	0.16
	Water Truck	0.92	48.32	0.11	0.89	46.87	0.10	0.20	10.67	0.02	1.37	71.92	0.16

Activity 4: Welding and Lower In		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	0.17	3,958	8.73	0.14	3,241	7.15	0.05	1,131	2.49	0.29	6,868	15.14
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	1,187	2.62	0.09	703.89	1.55	0.01	122.18	0.27	0.41	3,322	7.32
Construction Equipment	Backhoe	6.46	338.42	0.75	6.27	328.27	0.72	0.05	2.51	5.54E-03	6.65	348.39	0.77
	Blade	1.30	68.27	0.15	1.26	66.22	0.15	0.19	10.15	0.02	1.65	86.41	0.19
	RT Crane	1.70	89.01	0.20	1.65	86.34	0.19	0.15	7.67	0.02	2.29	119.82	0.26
	Dozer	1.38	72.18	0.16	1.34	70.01	0.15	0.20	10.34	0.02	1.72	90.13	0.20
	Excavator	1.16	60.67	0.13	1.12	58.85	0.13	0.20	10.22	0.02	1.54	80.66	0.18
	RT Forklift	1.43	74.74	0.16	1.38	72.50	0.16	0.06	3.06	6.76E-03	2.57	134.68	0.30
	Generator	0.40	21.00	0.05	0.39	20.37	0.04	0.03	1.55	3.42E-03	1.77	92.61	0.20
	Sideboom	6.83	357.57	0.79	6.62	346.84	0.76	0.27	14.01	0.03	8.67	453.99	1.00
	Skid Truck	0.92	48.32	0.11	0.89	46.87	0.10	0.20	10.67	0.02	1.37	71.92	0.16
	Tack Rig	1.38	72.18	0.16	1.34	70.01	0.15	0.20	10.34	0.02	1.72	90.13	0.20
	Water Truck	0.92	48.32	0.11	0.89	46.87	0.10	0.20	10.67	0.02	1.37	71.92	0.16
	Welding Machine	0.45	23.77	0.05	0.44	23.06	0.05	0.03	1.66	3.66E-03	1.88	98.40	0.22
	Welding Truck	0.92	48.32	0.11	0.89	46.87	0.10	0.20	10.67	0.02	1.37	71.92	0.16

Denbury Snowy River CO2 Project Emissions
Group 4 Flowline Construction

Total Miles 4.36

Activity 1: Clearing ROW		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	187.00	2,611,784	5,758	0.03	393.86	0.87	8.40E-03	117.32	0.26	2.30E-03	32.18	0.07
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	695,862	1,534	0.46	1,483	3.27	2.00E-03	6.40	0.01	3.77E-03	12.08	0.03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	73,223	7,670,158	16,910	0.09	9.22	0.02	0.40	41.58	0.09	0.74	77.18	0.17
	Dozer	74,585	7,812,808	17,224	0.09	9.82	0.02	0.37	38.38	0.08	1.89	198.00	0.44
	Water Truck	77,373	8,104,880	17,868	0.05	5.53	0.01	0.28	29.59	0.07	6.73	705.02	1.55

Activity 2: Trenching		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	187.00	1,224,274	2,699	0.03	184.62	0.41	8.40E-03	54.99	0.12	2.30E-03	15.09	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	652,370	1,438	0.46	1,390	3.06	2.00E-03	6.00	0.01	3.77E-03	11.32	0.02
Construction Equipment	Backhoe	15,862	830,782	1,832	0.44	23.23	0.05	0.17	8.80	0.02	3.02	158.02	0.35
	Excavator	73,888	3,869,934	8,532	0.07	3.89	8.57E-03	0.36	18.87	0.04	0.82	43.05	0.09
	Trencher	131,248	6,874,174	15,155	1.60	83.71	0.18	0.64	33.58	0.07	1.68	88.20	0.19

Activity 3: Stringing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	187.00	816,182	1,799	0.03	123.08	0.27	8.40E-03	36.66	0.08	2.30E-03	10.06	0.02
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Excavator w/ Vacculift	130,035	6,810,620	15,015	0.34	17.76	0.04	0.65	34.22	0.08	0.82	43.05	0.09
	RT Forklift	21,596	1,131,077	2,494	0.37	19.24	0.04	0.10	5.20	0.01	1.22	63.87	0.14
	Generator	11,243	588,865	1,298	0.24	12.38	0.03	0.08	4.00	8.81E-03	0.89	46.54	0.10
	Skid Truck	77,373	4,052,440	8,934	0.05	2.77	6.10E-03	0.28	14.79	0.03	6.73	352.51	0.78
	Water Truck	77,373	4,052,440	8,934	0.05	2.77	6.10E-03	0.28	14.79	0.03	6.73	352.51	0.78

Activity 4: Welding and Lower In		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	187.00	4,407,385	9,717	0.03	664.64	1.47	8.40E-03	197.98	0.44	2.30E-03	54.31	0.12
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	1,783,145	3,931	0.46	3,800	8.38	2.00E-03	16.40	0.04	3.77E-03	30.95	0.07
Construction Equipment	Backhoe	15,862	830,782	1,832	0.44	23.23	0.05	0.17	8.80	0.02	3.02	158.02	0.35
	Blade	73,223	3,835,079	8,455	0.09	4.61	0.01	0.31	15.99	0.04	0.74	38.59	0.09
	RT Crane	54,272	2,842,504	6,267	0.15	7.94	0.02	0.28	14.79	0.03	1.75	91.46	0.20
	Dozer	74,585	3,906,404	8,612	0.09	4.91	0.01	0.37	19.19	0.04	1.89	99.00	0.22
	Excavator	73,888	3,869,934	8,532	0.07	3.89	8.57E-03	0.36	18.87	0.04	0.82	43.05	0.09
	RT Forklift	21,596	1,131,077	2,494	0.37	19.24	0.04	0.10	5.20	0.01	1.22	63.87	0.14
	Generator	11,243	588,865	1,298	0.24	12.38	0.03	0.08	4.00	8.81E-03	0.89	46.54	0.10
	Sideboom	94,055	4,926,153	10,860	0.64	33.30	0.07	0.47	24.39	0.05	1.75	91.46	0.20
	Skid Truck	77,373	4,052,440	8,934	0.05	2.77	6.10E-03	0.28	14.79	0.03	6.73	352.51	0.78
	Tack Rig	74,585	3,906,404	8,612	0.09	4.91	0.01	0.39	20.39	0.04	1.89	99.00	0.22
	Water Truck	77,373	4,052,440	8,934	0.05	2.77	6.10E-03	0.28	14.79	0.03	6.73	352.51	0.78
	Welding Machine	12,003	628,635	1,386	0.25	13.13	0.03	0.05	2.80	6.17E-03	7.84	410.69	0.91
	Welding Truck	77,373	4,052,440	8,934	0.05	2.77	6.10E-03	0.46	23.99	0.05	6.73	352.51	0.78

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Activity 5: X Ray										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)						8	1	100	6.11	7,041	15.52	0.42	488.44	1.08
	Heavy Duty Truck (Other listed actvities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Generator	10.00	4.0	0.33	1.44	17.28				10.10	174.61	0.38	17.23	297.81	0.66
	X-Ray Truck	100.00	4.0	0.33	1.44	17.28				2.80	48.48	0.11	16.14	278.98	0.62

Activity 6: Testing										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)						6	1	100	6.11	3,666	8.08	0.42	254.34	0.56
	Heavy Duty Truck (Other listed actvities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04
Construction Equipment	Air Compressor/Dryer	400.00	2.0	0.10	0.44	5.24				37.95	198.76	0.44	140.25	734.58	1.62
	RT Forklift	65.00	2.0	0.10	0.44	5.24				12.90	67.54	0.15	95.48	500.10	1.10
	Generator	50.00	2.0	0.10	0.44	5.24				5.34	27.96	0.06	48.26	252.77	0.56

Activity 7: Backfill										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)						9	1	100	6.11	24,004	52.92	0.42	1,665	3.67
	Heavy Duty Truck (Other listed actvities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	260.00	2.0	1.00	4.36	52.38				4.95	259.26	0.57	20.71	1,085	2.39
	Dozer	240.00	2.0	1.00	4.36	52.38				5.30	277.55	0.61	21.66	1,134	2.50
	Excavator	236.00	2.0	1.00	4.36	52.38				4.15	217.12	0.48	18.73	981.12	2.16
	Generator	50.00	1.0	1.00	4.36	52.38				5.34	279.56	0.62	48.26	2,528	5.57
	Roller	145.00	2.0	1.00	4.36	52.38				10.67	558.87	1.23	25.19	1,319	2.91

Activity 8: Corrosion Protection										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)						5	1	100	6.11	4,401	9.70	0.42	305.28	0.67
	Heavy Duty Truck (Other listed actvities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Air Compressor	85.00	2.0	0.33	1.44	17.28				9.84	170.09	0.37	43.11	745.04	1.64
	Generator	10.00	1.0	0.33	1.44	17.28				10.10	174.61	0.38	17.23	297.81	0.66
	Paint Truck	185.00	2.0	0.33	1.44	17.28				2.80	48.48	0.11	16.14	278.98	0.62

Activity 9: Reclaim										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)						12	1	100	6.11	64,011	141.12	0.42	4,440	9.79
	Heavy Duty Truck (Other listed actvities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Backhoe	110.00	4.0	2.00	8.73	104.75				27.40	2,870	6.33	41.31	4,327	9.54
	Blade	200.00	4.0	2.00	8.73	104.75				4.95	518.51	1.14	20.71	2,169	4.78
	Farm Tractor	190.00	4.0	2.00	8.73	104.75				2.80	293.79	0.65	16.14	1,691	3.73

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Activity 5: X Ray		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	0.17	193.50	0.43	0.14	158.47	0.35	0.05	55.31	0.12	0.29	335.77	0.74
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Generator	0.98	16.86	0.04	0.95	16.35	0.04	8.91E-03	0.15	3.39E-04	3.45	59.61	0.13
	X-Ray Truck	0.92	15.95	0.04	0.89	15.47	0.03	0.20	3.52	7.76E-03	1.37	23.73	0.05

Activity 6: Testing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	0.17	100.76	0.22	0.14	82.52	0.18	0.05	28.80	0.06	0.29	174.84	0.39
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36
Construction Equipment	Air Compressor/Dryer	6.17	32.34	0.07	5.99	31.37	0.07	0.25	1.32	2.90E-03	8.14	42.64	0.09
	RT Forklift	1.43	7.47	0.02	1.38	7.25	0.02	0.06	0.31	6.76E-04	2.57	13.47	0.03
	Generator	0.40	2.10	4.63E-03	0.39	2.04	4.49E-03	0.03	0.16	3.42E-04	1.77	9.26	0.02

Activity 7: Backfill		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	0.17	659.65	1.45	0.14	540.24	1.19	0.05	188.55	0.42	0.29	1,145	2.52
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	68.27	0.15	1.26	66.22	0.15	0.19	10.15	0.02	1.65	86.41	0.19
	Dozer	1.38	72.18	0.16	1.34	70.01	0.15	0.20	10.34	0.02	1.72	90.13	0.20
	Excavator	1.16	60.67	0.13	1.12	58.85	0.13	0.20	10.22	0.02	1.54	80.66	0.18
	Generator	0.40	21.00	0.05	0.39	20.37	0.04	0.03	1.55	3.42E-03	1.77	92.61	0.20
	Roller	2.72	142.44	0.31	2.64	138.17	0.30	0.11	5.91	0.01	1.67	87.43	0.19

Activity 8: Corrosion Protection		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	0.17	120.94	0.27	0.14	99.04	0.22	0.05	34.57	0.08	0.29	209.85	0.46
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Air Compressor	1.74	30.06	0.07	1.69	29.16	0.06	0.06	1.02	2.26E-03	1.14	19.74	0.04
	Generator	0.98	16.86	0.04	0.95	16.35	0.04	8.91E-03	0.15	3.39E-04	3.45	59.61	0.13
	Paint Truck	0.92	15.95	0.04	0.89	15.47	0.03	0.20	3.52	7.76E-03	1.37	23.73	0.05

Activity 9: Reclaim		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	0.17	1,759	3.88	0.14	1,441	3.18	0.05	502.80	1.11	0.29	3,052	6.73
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Backhoe	6.46	676.84	1.49	6.27	656.53	1.45	0.05	5.02	0.01	6.65	696.78	1.54
	Blade	1.30	136.53	0.30	1.26	132.44	0.29	0.19	20.30	0.04	1.65	172.81	0.38
	Farm Tractor	0.92	96.65	0.21	0.89	93.75	0.21	0.20	21.34	0.05	1.37	143.85	0.32

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Activity 5: X Ray		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	187.00	215,472	475.03	0.03	32.49	0.07	8.40E-03	9.68	0.02	2.30E-03	2.66	5.85E-03
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Generator	2,422	41,863	92.29	0.30	5.25	0.01	0.02	0.26	5.82E-04	0.89	15.36	0.03
	X-Ray Truck	77,373	1,337,305	2,948	0.05	0.91	2.01E-03	0.15	2.64	5.82E-03	6.73	116.33	0.26

Activity 6: Testing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	187.00	112,200	247.36	0.03	16.92	0.04	8.40E-03	5.04	0.01	2.30E-03	1.38	3.05E-03
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	86,983	191.76	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Air Compressor/Dryer	88,895	465,592	1,026	0.62	3.25	7.17E-03	0.61	3.20	7.05E-03	0.89	4.65	0.01
	RT Forklift	21,596	113,108	249.36	0.37	1.92	4.24E-03	0.10	0.52	1.15E-03	1.22	6.39	0.01
	Generator	11,243	58,887	129.82	0.24	1.24	2.73E-03	0.08	0.40	8.81E-04	0.89	4.65	0.01

Activity 7: Backfill		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	187.00	734,564	1,619	0.03	110.77	0.24	8.40E-03	33.00	0.07	2.30E-03	9.05	0.02
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	3,835,079	8,455	0.09	4.61	0.01	0.40	20.79	0.05	0.74	38.59	0.09
	Dozer	74,585	3,906,404	8,612	0.09	4.91	0.01	0.37	19.19	0.04	1.89	99.00	0.22
	Excavator	73,888	3,869,934	8,532	0.07	3.89	8.57E-03	0.36	18.87	0.04	0.82	43.05	0.09
	Generator	11,243	588,865	1,298	0.24	12.38	0.03	0.08	4.00	8.81E-03	0.89	46.54	0.10
	Roller	41,867	2,192,797	4,834	0.13	6.98	0.02	0.22	11.59	0.03	1.19	62.27	0.14

Activity 8: Corrosion Protection		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	187.00	134,670	296.90	0.03	20.31	0.04	8.40E-03	6.05	0.01	2.30E-03	1.66	3.66E-03
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Air Compressor	21,856	377,765	832.83	0.10	1.65	3.65E-03	0.13	2.24	4.94E-03	0.89	15.36	0.03
	Generator	2,422	41,863	92.29	0.30	5.25	0.01	0.02	0.26	5.82E-04	0.89	15.36	0.03
	Paint Truck	77,373	1,337,305	2,948	0.05	0.91	2.01E-03	0.28	4.88	0.01	6.73	116.33	0.26

Activity 9: Reclaim		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffc)	187.00	1,958,838	4,318	0.03	295.40	0.65	8.40E-03	87.99	0.19	2.30E-03	24.14	0.05
	Heavy Duty Truck (Other listed actvities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Backhoe	15,862	1,661,565	3,663	0.44	46.47	0.10	0.17	17.59	0.04	3.02	316.04	0.70
	Blade	73,223	7,670,158	16,910	0.09	9.22	0.02	0.31	31.98	0.07	0.74	77.18	0.17
	Farm Tractor	77,373	8,104,880	17,868	0.05	5.53	0.01	0.29	30.38	0.07	6.73	705.02	1.55

Denbury Snowy River CO2 Project Emissions
Group 4 Road Maintenance and Construction

New Roads

Miles 0.08

Activity 1: Road Clear										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	5,500	12.12	0.42	381.51	0.84
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor/Dryer				—	—									
	Blade	300.00	3.00	2.00	0.16	1.92				4.95	9.50	0.02	20.71	39.76	0.09
	Dozer	400.00	3.00	2.00	0.16	1.92				41.39	79.46	0.18	98.38	188.88	0.42
	Scraper	400.00	3.00	2.00	0.16	1.92				43.35	83.23	0.18	102.59	196.97	0.43

Activity 2: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	7,333	16.17	0.42	508.68	1.12
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	300.00	2.00	2.00	0.16	1.92				4.95	9.50	0.02	20.71	39.76	0.09
	Dozer	400.00	3.00	2.00	0.16	1.92				41.39	79.46	0.18	98.38	188.88	0.42
	Dump Truck	350.00	4.00	2.00	0.16	1.92				7.76	14.90	0.03	33.63	64.57	0.14
	Scraper	400.00	3.00	2.00	0.16	1.92				43.35	83.23	0.18	102.59	196.97	0.43

Two-Tracks Road Modifications

Miles 4.29

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	62,917	138.71	0.42	4,364	9.62
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						12	2	100	1.65	3,963	8.74	4.58	10,997	24.24
Construction Equipment	Blade	300.00	2.00	2.00	8.58	102.96				4.95	509.65	1.12	20.71	2,132	4.70
	Dozer	400.00	3.00	2.00	8.58	102.96				41.39	4,261	9.39	98.38	10,129	22.33
	Dump Truck	350.00	4.00	2.00	8.58	102.96				7.76	799.15	1.76	33.63	3,463	7.63
	Scraper	400.00	3.00	2.00	8.58	102.96				43.35	4,463	9.84	102.59	10,562	23.29

Existing Roads

Miles —

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						2	1	100	6.11	—	—	0.42	—	—
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	—	—	4.58	—	—
Construction Equipment	Blade	300.00	2.00	2.00	—	—				4.95	—	—	20.71	—	—

Denbury Snowy River CO2 Project Emissions
Group 4 Road Maintenance and Construction

New Roads

Miles 0.08

Activity 1: Road Clear		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	151.14	0.33	0.14	123.78	0.27	0.05	43.20	0.10	0.29	262.26	0.58
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor/Dryer												
	Blade	1.30	2.50	5.52E-03	1.26	2.43	5.35E-03	0.19	0.37	8.20E-04	1.65	3.17	6.98E-03
	Dozer	7.76	14.90	0.03	7.53	14.46	0.03	0.37	0.71	1.56E-03	7.10	13.63	0.03
	Scraper	8.06	15.47	0.03	7.81	15.00	0.03	0.37	0.70	1.55E-03	7.34	14.09	0.03

Activity 2: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	201.52	0.44	0.14	165.04	0.36	0.05	57.60	0.13	0.29	349.68	0.77
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	2.50	5.52E-03	1.26	2.43	5.35E-03	0.19	0.37	8.20E-04	1.65	3.17	6.98E-03
	Dozer	7.76	14.90	0.03	7.53	14.46	0.03	0.37	0.71	1.56E-03	7.10	13.63	0.03
	Dump Truck	2.08	3.99	8.79E-03	2.01	3.87	8.53E-03	0.35	0.67	1.49E-03	2.72	5.22	0.01
	Scraper	8.06	15.47	0.03	7.81	15.00	0.03	0.37	0.70	1.55E-03	7.34	14.09	0.03

Two-Tracks Road Modifications

Miles 4.29

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,729	3.81	0.14	1,416	3.12	0.05	494.21	1.09	0.29	3,000	6.61
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	347.45	0.77	0.09	206.02	0.45	0.01	35.76	0.08	0.41	972.24	2.14
Construction Equipment	Blade	1.30	134.20	0.30	1.26	130.17	0.29	0.19	19.95	0.04	1.65	169.86	0.37
	Dozer	7.76	799.28	1.76	7.53	775.30	1.71	0.37	37.95	0.08	7.10	730.79	1.61
	Dump Truck	2.08	213.79	0.47	2.01	207.38	0.46	0.35	36.17	0.08	2.72	279.93	0.62
	Scraper	8.06	829.45	1.83	7.81	804.57	1.77	0.37	37.79	0.08	7.34	755.77	1.67

Existing Roads

Miles —

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	—	—	0.14	—	—	0.05	—	—	0.29	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	—	—	0.09	—	—	0.01	—	—	0.41	—	—
Construction Equipment	Blade	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—

Denbury Snowy River CO2 Project Emissions
Group 4 Road Maintenance and Construction

New Roads

Miles 0.08

Activity 1: Road Clear		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	168,300	371.04	0.03	25.38	0.06	8.40E-03	7.56	0.02	2.30E-03	2.07	4.57E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	6.79	0.01
Construction Equipment	Air Compressor/Dryer							—	—	—	—	—	—
	Blade	73,223	140,588	309.94	0.09	0.17	3.73E-04	0.46	0.88	1.94E-03	0.74	1.41	3.12E-03
	Dozer	134,685	258,595	570.11	0.51	0.98	2.16E-03	0.61	1.17	2.58E-03	1.89	3.63	8.00E-03
	Scraper	133,797	256,891	566.35	0.53	1.02	2.25E-03	0.61	1.17	2.58E-03	3.04	5.84	0.01

Activity 2: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	224,400	494.72	0.03	33.84	0.07	8.40E-03	10.08	0.02	2.30E-03	2.77	6.10E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	140,588	309.94	0.09	0.17	3.73E-04	0.46	0.88	1.94E-03	0.74	1.41	3.12E-03
	Dozer	134,685	258,595	570.11	0.51	0.98	2.16E-03	0.61	1.17	2.58E-03	1.89	3.63	8.00E-03
	Dump Truck	132,987	255,334	562.92	0.13	0.25	5.47E-04	0.53	1.03	2.26E-03	6.73	12.92	0.03
	Scraper	133,797	256,891	566.35	0.53	1.02	2.25E-03	0.61	1.17	2.58E-03	3.04	5.84	0.01

Two-Tracks Road Modifications

Miles 4.29

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,925,352	4,245	0.03	290.35	0.64	8.40E-03	86.49	0.19	2.30E-03	23.72	0.05
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	521,896	1,151	0.46	1,112	2.45	2.00E-03	4.80	0.01	3.77E-03	9.06	0.02
Construction Equipment	Blade	73,223	7,539,039	16,621	0.09	9.07	0.02	0.46	47.16	0.10	0.74	75.86	0.17
	Dozer	134,685	13,867,180	30,572	0.51	52.43	0.12	0.61	62.87	0.14	1.89	194.62	0.43
	Dump Truck	132,987	13,692,291	30,186	0.13	13.31	0.03	0.53	55.02	0.12	6.73	692.97	1.53
	Scraper	133,797	13,775,766	30,370	0.53	54.63	0.12	0.61	62.87	0.14	3.04	313.25	0.69

Existing Roads

Miles —

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	—	—	0.03	—	—	8.40E-03	—	—	2.30E-03	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	—	—	0.46	—	—	2.00E-03	—	—	3.77E-03	—	—
Construction Equipment	Blade	73,223	—	—	0.09	—	—	0.46	—	—	0.74	—	—

Denbury Snowy River CO2 Project Emissions
Group 4 Fugitive Dust Emissions from Paved Roads

Summary of Fugitive Emissions

Paved Roads emission factor from AP-42, Section 13.2.1: *Paved Roads* (01/11)

$$E = k(sL)^{0.91}(W)^{1.02}(1-P/(4*365))$$

where:

sL =	0.6	road surface silt loading silt loading (g/m2) [Table 13.2.1-2, for Ubiquitous Baseline, <500]
W_{LDT} =	4	tons [Average vehicle weight]
$W_{Tractor}$ =	25	tons [Average vehicle weight]
k =	0.0022	lb/VMT [Table 13.2.1-1, for PM_{10}]
k =	0.00054	lb/VMT [Table 13.2.1-1, for $PM_{2.5}$]
P =	100	days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.1-2]

1/2 Ton Trucks (light-duty trucks)

$E_{(PM10)}$ =	5.29E-03	lb/VMT
$E_{(PM2.5)}$ =	1.30E-03	lb/VMT
126		Duration of Construction (days)-Well Pad Construction
38		Duration of Construction (days)-Flow/Bulk Line Construction
0		Duration of Construction (days)-Pump Station Construction
9		Duration of Construction (days)-Road Construction (existing and two-track roads)

Tractor Trailers

$E_{(PM10)}$ =	3.43E-02	lb/VMT
$E_{(PM2.5)}$ =	8.43E-03	lb/VMT
2		Equipment Delivery (days) -Well Pad Construction
2		Equipment Delivery (days) -Flow/Bulk Line Construction
0		Equipment Delivery (days) -Pump Station Construction
2		Equipment Delivery (days) -Road Construction (existing and two-track roads)

Project Segment

Equipment Type	Average Vehicle Weight (tons)[a]	Well Pad Construction			Flow/Bulk Line Construction			Pump Station Construction			Road Construction		
		VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]
Light Duty Trucks	4	100	22	277288	100	135	516159	100	0	0	100	12	10296
Tractor Trailers	25	100	3	600	100	106	21200	100	0	0	100	12	2400
Total VMT				277888			537359			0			12696
a - Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.													
PM10 (tons)				**0.74**			**1.73**			**0.00**			**0.07**
PM2.5 (tons)				**0.18**			**0.42**			**0.00**			**0.02**

Project Totals

Total Paved Road Emissions	
Pollutant	**tons**
PM_{10}	**2.54**
$PM_{2.5}$	**0.62**

[a] *Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.*

[b] VMT per day are projected based on experience from previous construction projects.

[c] Vehicle Miles Traveled (VMT) are based on the vehicle quantity , project duration, and experience from previous construction projects.

Denbury Snowy River CO2 Project Emissions
Group 4 Fugitive Dust Emissions from Unpaved Roads

Summary of Fugitive Emissions

Unpaved Roads emission factor from AP-42, Section 13.2.2: *Unpaved Roads* (11/06); Equations a1 and 2

$$E = k\,(s/12)^a (W/3)^b \qquad (1a)$$

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight

Table 13.2.2-2 - Constants for Equation 1a

Constant	PM2.5	PM10
k (lb/VMT)	0.15	1.5
a	0.9	0.9
b	0.45	0.45

Surface Silt (s) content based on Table 13.2.2-1 - construction sites

s = 8.50

$$E_{ext} = E\,[(365 - P)/365] \qquad (2)$$

E_{ext} = annual size-specific emisison factor extrapolated for natural mitigation, lb/VMT
E = emisison factor from Equation 1a
P = days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.2-1

P = 100

Equipment	Construction Duration (days)	Miles per Day	Quantity	Total Vehicle Miles Traveled[a] (VMT)	W: Mean Vehicle Weight (tons)[b]	Emission Factors (lb/VMT)[c]		Emissions (tons)		Controlled Emissions (tons)	
						PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Well Pad Construction											
1/2 Ton Trucks	2.32	100	0	3,272	12.02941176	1.492	0.149	2.440	0.244	1.2	0.1
							Total (tons)	**2.440**	**0.244**	**1.2**	**0.1**

(a) VMT per day are projected based on experience from previous construction projects
(b) Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.
(c) AP 42 Section 13.2.2 Unpaved Roads, dated November 2006, Equations 1a and 2

Denbury Snowy River CO2 Project Emissions
Group 4 Fugitive Dust Emissions from Earthmoving Activities

Construction Activity	Activity Type	Approximate Pipeline Length or Road Length (mi)	Excavation Volume[a] (ft^3)	Temporary Workspace for Construction (acres)[b]
Flowline Injection Well 04	Pipeline	3.60	342,014	2.62
Flowline Injection Well 05	Pipeline	0.77	72,799	0.56
BLM Two-Track Injection Well 04	Access Roads	3.56	563,904	12.95
BLM Two-Track Injection Well 05	Access Roads	0.73	115,632	2.65
New Road Injection Well 04	Access Roads	0.03	4,752	0.11
New Road Injection Well 05	Access Roads	0.05	7,920	0.18
Injection Well 04 Construction Pad	Well Pad Construction	--	601,128	4.6
Injection Well 05 Construction Pad	Well Pad Construction	--	601128	4.6

Project Construction Activity Particulate Matter Emissions

Construction Activity	Excavation[a] (tons)	Excavation PM_{10} Emission Factor[c] (lb/ton)	Pipeline Excavation PM_{10} Emissions (tons)	Backfilling[a] (tons)	Backfilling PM_{10} Emission Factor[b] (lb/ton)	Backfilling PM10 Emissions (tpy)	Windblown Dust Area (acre)	PM_{10} Windblown Dust Emission Factor[d,e] (tons/acre)	Windblown Dust PM_{10} Emissions - Uncontrolled (tons)	Total Construction Activity PM_{10} emissions (tons)	Total Controlled Construction Activity PM_{10} emissions[3] (tons)	Total Construction Activity $PM_{2.5}$ emissions[f] (tons)	Total Controlled Construction Activity $PM_{2.5}$ emissions[g] (tons)
Flowline Injection Well 04	17,101	0.058	0.496	17,101	0.012	0.103	2.6	3.80E-01	0.99	1.593	0.797	0.331	0.166
Flowline Injection Well 05 - Pipeline	3,640	0.058	0.106	3,640	0.012	0.022	0.6	3.80E-01	0.21	0.339	0.170	0.071	0.035
BLM Two-Track Injection Well 04	28,195	0.058	0.818	28,195	0.012	0.169	12.9	3.80E-01	4.92	5.906	2.953	1.228	0.614
BLM Two-Track Injection Well 05	5,782	0.058	0.168	5,782	0.012	0.035	2.7	3.80E-01	1.01	1.211	0.606	0.252	0.126
New Road Injection Well 04	238	0.058	0.007	238	0.012	0.001	0.1	3.80E-01	0.04	0.050	0.025	0.010	0.005
New Road Injection Well 05	396	0.058	0.011	396	0.012	0.002	0.2	3.80E-01	0.07	0.083	0.041	0.017	0.009
Injection Well 04 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
Injection Well 05 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
									Total	**14.782**	**7.391**	**3.075**	**1.537**

(a) Excavation of well pad sites assumed to be 3 feet deep. Excavation and backfilling assumes pipeline will be 6 ft x 3 ft x approximate length (ft) for the Project component. Excavation for road construction assumes road excavation is 30 ft width x 1 ft deep x approximate road length (ft). Soil density is assumed to be 100 lb/ft^3

(b) Temporary workspace acres for roadways assumed to be 30 ft width x approximate road length (mi).

(c) Excavation and backfilling factors from AP-42, Table 11.9-4 (dated 7/98), assuming 100% of TSP is PM_{10}

(d) Windblown dust factor from AP-42 Table 11.9-4 Uncontroled Particulate Emission Factors for Open Dust Sources

(e) PM_{10} emissions are conservatively assumed to be 100% of TSP.

(f) $PM_{2.5}$ emissions were calculated following the SCAQMD Particulate Matter $PM_{2.5}$ Significance Thresholds and Calculation Methodology (2006). For construction and demolition fugitive dust sources, 20.8% of the PM_{10} would be $PM_{2.5}$

(g) Controls are conservatively assumed to have a 50% reducton factor based on Emission Factors for Paved and Unpaved Roads (1/2015) Utah DEQ

Denbury Snowy River CO2 Project Emissions
Construction Group 5 Emissions Summary

Uncontrolled Emissions Summary (U.S. Tons Total)

Category	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-year GWP CO_2e	100- year GWP CO_2e	HAPS
Well Construction	0.65	0.41	0.03	0.03	4.89E-03	0.05	298.91	6.18E-03	5.08E-03	300.81	300.48	5.69E-03
Flow/Bulk Line Construction	1.74	0.54	0.07	0.06	0.01	0.11	560.87	0.02	4.66E-03	563.79	562.74	0.02
Pump Station Construction	0.08	0.20	0.01	0.02	6.09E-04	0.01	200.68	4.50E-03	1.40E-03	201.43	201.20	4.90E-03
Road Construction	0.17	0.08	7.97E-03	6.82E-03	1.45E-03	0.01	105.29	3.62E-03	7.25E-04	105.79	105.60	2.10E-03
Paved Roads			6.87	1.69								
Unpaved Roads			**3.38**	**0.34**								
Earthmoving			53.83	26.92								
Total	2.63	1.24	**64.20**	**29.06**	0.02	0.18	1,165.76	0.03	0.01	1,171.82	1,170.02	0.03

Controlled Emissions Summary (U.S. Tons Total)

Category	PM_{10}	$PM_{2.5}$
Well Construction	0.03	0.03
Flow/Bulk Line Construction	0.07	0.06
Pump Station Construction	0.01	0.02
Road Construction	7.97E-03	6.82E-03
Paved Roads	6.87	1.69
Unpaved Roads	1.69	0.17
Earthmoving	26.92	5.60
Controlled Total	35.60	7.57

Denbury Snowy River CO2 Project Emissions
Group 5 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						3	1	100	6.11	3,373	7.44	0.42	233.99	0.52
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						3	2	100	1.65	990.66	2.18	4.58	2,749	6.06
Construction Equipment	Backhoe					0.00E+00									
	Dozer	153.00	2.00	0.20	1.84	22.08				6.06	133.89	0.30	19.27	425.53	0.94
	Excavator	160.00	1.00	0.20	1.84	22.08				5.28	116.67	0.26	17.08	377.21	0.83

Activity 2: Drill Pad Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	33,732	74.37	0.42	2,340	5.16
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						5	2	100	1.65	1,651	3.64	4.58	4,582	10.10
Construction Equipment	Blade	140.00	1.00	0.25	2.30	27.60				6.09	167.98	0.37	19.47	537.36	1.18
	Dozer	153.00	1.00	1.00	9.20	110.40				6.06	669.43	1.48	19.27	2,128	4.69
	Roller Compactor	156.00	1.00	0.25	2.30	27.60				10.67	294.50	0.65	25.19	695.26	1.53
	Scraper	400.00	3.00	1.00	9.20	110.40				43.35	4,785	10.55	102.59	11,326	24.97

Activity 3: Drill Pad Drilling

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						4.00	1	100	6	224,051	493.95	0.42	15,542	34.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4.00	2	100	2	1,321	2.91	4.58	3,666	8.08
Construction Equipment (Drill Rig)	Generator	3,000	4.00	60.00	60.00	720.00				88	63,515	140.03	234.63	168,931	372.43

Activity 4: Drill Pad Construction

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9.00	1	100	6	205,380	452.79	0.42	14,247	31.41
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9.00	2	100	2	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26	12,594	27.77	65.08	31,241	68.87
	Generator	25.00	3.00	55.00	55.00	660.00				14	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				26	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 5 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	92.70	0.20	0.14	75.92	0.17	0.05	26.50	0.06	0.29	160.85	0.35
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	86.86	0.19	0.09	51.50	0.11	0.01	8.94	0.02	0.41	243.06	0.54
Construction Equipment	Backhoe												
	Dozer	1.45	31.98	0.07	1.40	31.02	0.07	0.11	2.52	5.56E-03	0.96	21.23	0.05
	Excavator	1.24	27.28	0.06	1.20	26.46	0.06	0.12	2.54	5.61E-03	0.85	18.80	0.04

Activity 2: Drill Pad Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	926.97	2.04	0.14	759.17	1.67	0.05	264.96	0.58	0.29	1,609	3.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	144.77	0.32	0.09	85.84	0.19	0.01	14.90	0.03	0.41	405.10	0.89
Construction Equipment	Blade	1.45	39.96	0.09	1.40	38.76	0.09	0.12	3.26	7.19E-03	0.97	26.71	0.06
	Dozer	1.45	159.90	0.35	1.40	155.10	0.34	0.11	12.62	0.03	0.96	106.15	0.23
	Roller Compactor	2.72	75.06	0.17	2.64	72.81	0.16	0.11	3.11	6.87E-03	1.67	46.07	0.10
	Scraper	8.06	889.39	1.96	7.81	862.70	1.90	0.37	40.52	0.09	7.34	810.38	1.79

Activity 3: Drill Pad Drilling		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	6,157	13.57	0.14	3,301	7.28	0.05	1,760	3.88	0.29	10,684	23.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment (Drill Rig)	Generator	10.64	7,661	16.89	10.32	7,431	16.38	0.42	302.18	0.67	13.21	9,510	20.97

Activity 4: Drill Pad Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	5,644	12.44	0.14	6,808	15.01	0.05	1,613	3.56	0.29	9,794	21.59
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66	1,754	3.87	0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 5 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	103,224	227.57	0.03	15.57	0.03	8.40E-03	4.64	0.01	2.30E-03	1.27	2.80E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	130,474	287.65	0.46	278.04	0.61	2.00E-03	1.20	2.65E-03	3.77E-03	2.26	4.99E-03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Dozer	43,104	951,739	2,098	0.07	1.65	3.64E-03	0.23	5.16	0.01	1.89	41.74	0.09
	Excavator	43,580	962,237	2,121	0.06	1.41	3.11E-03	0.24	5.39	0.01	0.82	18.15	0.04

Activity 2: Drill Pad Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,032,240	2,276	0.03	155.66	0.34	8.40E-03	46.37	0.10	2.30E-03	12.72	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	217,457	479.41	0.46	463.40	1.02	2.00E-03	2.00	4.41E-03	3.77E-03	3.77	8.32E-03
Construction Equipment	Blade	44,593	1,230,761	2,713	0.07	2.06	4.55E-03	0.21	5.90	0.01	0.74	20.33	0.04
	Dozer	43,104	4,758,694	10,491	0.07	8.25	0.02	0.23	25.79	0.06	1.89	208.68	0.46
	Roller Compactor	41,867	1,155,529	2,548	0.13	3.68	8.11E-03	0.24	6.57	0.01	1.19	32.82	0.07
	Scraper	133,797	14,771,217	32,565	0.53	58.58	0.13	0.61	67.42	0.15	3.04	335.88	0.74

Activity 3: Drill Pad Drilling		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,856,318	15,116	0.03	1,034	2.28	8.40E-03	307.98	0.68	2.30E-03	84.48	0.19
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	1.25	2.75E-03
Construction Equipment (Drill Rig)	Generator	148,388	106,839,491	235,541	1.00	722.78	1.59	4.58	3,298	7.27	0.89	639.77	1.41

Activity 4: Drill Pad Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	6,284,958	13,856	0.03	947.79	2.09	8.40E-03	282.32	0.62	2.30E-03	77.44	0.17
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	1.25	2.75E-03
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89	586.46	1.29
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 5 Flowline Construction

Total Miles 15.93

Activity 1: Clearing ROW

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						16	1	100	6.11	311,434	686.59	0.42	21,604	47.63
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						16	2	100	1.65	5,284	11.65	4.58	14,662	32.32
Construction Equipment	Backhoe				0.00E+00	0.00E+00									
	Blade	260.00	2.0	2.00	31.85	382.23				4.95	1,892	4.17	20.71	7,915	17.45
	Dozer	240.00	8.0	2.00	31.85	382.23				5.30	2,026	4.47	21.66	8,277	18.25
	Water Truck	185.00	6.0	2.00	31.85	382.23				2.80	1,072	2.36	16.14	6,170	13.60

Activity 2: Trenching

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						15	1	100	6.11	145,985	321.84	0.42	10,127	22.33
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						15	2	100	1.65	4,953	10.92	4.58	13,746	30.30
Construction Equipment	Backhoe	110.00	1.0	1.00	15.93	191.12				27.40	5,236	11.54	41.31	7,894	17.40
	Excavator	236.00	11.0	1.00	15.93	191.12				4.15	792.28	1.75	18.73	3,580	7.89
	Trencher	420.00	3.0	1.00	15.93	191.12				167.73	32,066	70.69	342.02	65,365	144.10

Activity 3: Stringing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						10	1	100	6.11	97,323	214.56	0.42	6,751	14.88
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Excavator w/ Vacculift	428.00	2.0	1.00	15.93	191.12				26.24	5,015	11.06	65.08	12,439	27.42
	RT Forklift	65.00	2.0	1.00	15.93	191.12				12.90	2,465	5.43	95.48	18,249	40.23
	Generator	50.00	2.0	1.00	15.93	191.12				5.34	1,020	2.25	48.26	9,224	20.33
	Skid Truck	185.00	2.0	1.00	15.93	191.12				2.80	536.02	1.18	16.14	3,085	6.80
	Water Truck	185.00	2.0	1.00	15.93	191.12				2.80	536.02	1.18	16.14	3,085	6.80

Activity 4: Welding and Lower In

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						54	1	100	6.11	525,544	1,159	0.42	36,456	80.37
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						41	2	100	1.65	13,539	29.85	4.58	37,572	82.83
Construction Equipment	Backhoe	110.00	2.0	1.00	15.93	191.12				27.40	5,236	11.54	41.31	7,894	17.40
	Blade	200.00	2.0	1.00	15.93	191.12				4.95	946.02	2.09	20.71	3,958	8.73
	RT Crane	185.00	2.0	1.00	15.93	191.12				7.29	1,393	3.07	27.67	5,288	11.66
	Dozer	240.00	2.0	1.00	15.93	191.12				5.30	1,013	2.23	21.66	4,139	9.12
	Excavator	236.00	2.0	1.00	15.93	191.12				4.15	792.28	1.75	18.73	3,580	7.89
	RT Forklift	65.00	2.0	1.00	15.93	191.12				12.90	2,465	5.43	95.48	18,249	40.23
	Generator	50.00	2.0	1.00	15.93	191.12				5.34	1,020	2.25	48.26	9,224	20.33
	Sideboom	305.00	10.0	1.00	15.93	191.12				38.89	7,432	16.38	129.26	24,705	54.46
	Skid Truck	185.00	2.0	1.00	15.93	191.12				2.80	536.02	1.18	16.14	3,085	6.80
	Tack Rig	255.00	2.0	1.00	15.93	191.12				5.30	1,013	2.23	21.66	4,139	9.12
	Water Truck	185.00	2.0	1.00	15.93	191.12				2.80	536.02	1.18	16.14	3,085	6.80
	Welding Machine	35.00	14.0	1.00	15.93	191.12				5.79	1,107	2.44	51.09	9,763	21.52
	Welding Truck	300.00	10.0	1.00	15.93	191.12				2.80	536.02	1.18	16.14	3,085	6.80

Denbury Snowy River CO2 Project Emissions
Group 5 Flowline Construction

Total Miles 15.93

Activity 1: Clearing ROW		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	8,558	18.87	0.14	7,009	15.45	0.05	2,446	5.39	0.29	14,851	32.74
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	463.26	1.02	0.09	274.69	0.61	0.01	47.68	0.11	0.41	1,296	2.86
Construction Equipment	Backhoe												
	Blade	1.30	498.21	1.10	1.26	483.26	1.07	0.19	74.06	0.16	1.65	630.60	1.39
	Dozer	1.38	526.75	1.16	1.34	510.95	1.13	0.20	75.48	0.17	1.72	657.78	1.45
	Water Truck	0.92	352.67	0.78	0.89	342.09	0.75	0.20	77.88	0.17	1.37	524.89	1.16

Activity 2: Trenching		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	4,012	8.84	0.14	3,286	7.24	0.05	1,147	2.53	0.29	6,961	15.35
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	434.31	0.96	0.09	257.52	0.57	0.01	44.70	0.10	0.41	1,215	2.68
Construction Equipment	Backhoe	6.46	1,235	2.72	6.27	1,198	2.64	0.05	9.16	0.02	6.65	1,271	2.80
	Excavator	1.16	221.40	0.49	1.12	214.75	0.47	0.20	37.30	0.08	1.54	294.31	0.65
	Trencher	27.66	5,286	11.65	26.83	5,127	11.30	0.40	76.52	0.17	23.86	4,559	10.05

Activity 3: Stringing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	2,675	5.90	0.14	2,190	4.83	0.05	764.47	1.69	0.29	4,641	10.23
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Excavator w/ Vacculift	5.40	1,032	2.28	5.24	1,001	2.21	0.35	67.01	0.15	5.07	968.49	2.14
	RT Forklift	1.43	272.74	0.60	1.38	264.56	0.58	0.06	11.18	0.02	2.57	491.45	1.08
	Generator	0.40	76.64	0.17	0.39	74.34	0.16	0.03	5.66	0.01	1.77	337.92	0.74
	Skid Truck	0.92	176.34	0.39	0.89	171.05	0.38	0.20	38.94	0.09	1.37	262.45	0.58
	Water Truck	0.92	176.34	0.39	0.89	171.05	0.38	0.20	38.94	0.09	1.37	262.45	0.58

Activity 4: Welding and Lower In		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	14,442	31.84	0.14	11,828	26.08	0.05	4,128	9.10	0.29	25,061	55.25
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	1,187	2.62	0.09	703.89	1.55	0.01	122.18	0.27	0.41	3,322	7.32
Construction Equipment	Backhoe	6.46	1,235	2.72	6.27	1,198	2.64	0.05	9.16	0.02	6.65	1,271	2.80
	Blade	1.30	249.10	0.55	1.26	241.63	0.53	0.19	37.03	0.08	1.65	315.30	0.70
	RT Crane	1.70	324.81	0.72	1.65	315.07	0.69	0.15	27.98	0.06	2.29	437.21	0.96
	Dozer	1.38	263.37	0.58	1.34	255.47	0.56	0.20	37.74	0.08	1.72	328.89	0.73
	Excavator	1.16	221.40	0.49	1.12	214.75	0.47	0.20	37.30	0.08	1.54	294.31	0.65
	RT Forklift	1.43	272.74	0.60	1.38	264.56	0.58	0.06	11.18	0.02	2.57	491.45	1.08
	Generator	0.40	76.64	0.17	0.39	74.34	0.16	0.03	5.66	0.01	1.77	337.92	0.74
	Sideboom	6.83	1,305	2.88	6.62	1,266	2.79	0.27	51.12	0.11	8.67	1,657	3.65
	Skid Truck	0.92	176.34	0.39	0.89	171.05	0.38	0.20	38.94	0.09	1.37	262.45	0.58
	Tack Rig	1.38	263.37	0.58	1.34	255.47	0.56	0.20	37.74	0.08	1.72	328.89	0.73
	Water Truck	0.92	176.34	0.39	0.89	171.05	0.38	0.20	38.94	0.09	1.37	262.45	0.58
	Welding Machine	0.45	86.74	0.19	0.44	84.13	0.19	0.03	6.05	0.01	1.88	359.05	0.79
	Welding Truck	0.92	176.34	0.39	0.89	171.05	0.38	0.20	38.94	0.09	1.37	262.45	0.58

Denbury Snowy River CO2 Project Emissions

Group 5 Flowline Construction

Total Miles 15.93

Activity 1: Clearing ROW		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	9,530,358	21,011	0.03	1,437	3.17	8.40E-03	428.10	0.94	2.30E-03	117.43	0.26
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	695,862	1,534	0.46	1,483	3.27	2.00E-03	6.40	0.01	3.77E-03	12.08	0.03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	73,223	27,988,286	61,704	0.09	33.66	0.07	0.40	151.72	0.33	0.74	281.61	0.62
	Dozer	74,585	28,508,814	62,851	0.09	35.83	0.08	0.37	140.05	0.31	1.89	722.50	1.59
	Water Truck	77,373	29,574,578	65,201	0.05	20.18	0.04	0.28	107.96	0.24	6.73	2,573	5.67

Activity 2: Trenching		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	4,467,355	9,849	0.03	673.69	1.49	8.40E-03	200.67	0.44	2.30E-03	55.05	0.12
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	652,370	1,438	0.46	1,390	3.06	2.00E-03	6.00	0.01	3.77E-03	11.32	0.02
Construction Equipment	Backhoe	15,862	3,031,512	6,683	0.44	84.78	0.19	0.17	32.10	0.07	3.02	576.62	1.27
	Excavator	73,888	14,121,329	31,132	0.07	14.19	0.03	0.36	68.86	0.15	0.82	157.08	0.35
	Trencher	131,248	25,083,751	55,300	1.60	305.47	0.67	0.64	122.55	0.27	1.68	321.85	0.71

Activity 3: Stringing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	2,978,237	6,566	0.03	449.12	0.99	8.40E-03	133.78	0.29	2.30E-03	36.70	0.08
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Excavator w/ Vacculift	130,035	24,851,846	54,789	0.34	64.82	0.14	0.65	124.88	0.28	0.82	157.08	0.35
	RT Forklift	21,596	4,127,281	9,099	0.37	70.19	0.15	0.10	18.97	0.04	1.22	233.07	0.51
	Generator	11,243	2,148,759	4,737	0.24	45.16	0.10	0.08	14.59	0.03	0.89	169.82	0.37
	Skid Truck	77,373	14,787,289	32,600	0.05	10.09	0.02	0.28	53.98	0.12	6.73	1,286	2.84
	Water Truck	77,373	14,787,289	32,600	0.05	10.09	0.02	0.28	53.98	0.12	6.73	1,286	2.84

Activity 4: Welding and Lower In		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	16,082,479	35,456	0.03	2,425	5.35	8.40E-03	722.42	1.59	2.30E-03	198.17	0.44
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	1,783,145	3,931	0.46	3,800	8.38	2.00E-03	16.40	0.04	3.77E-03	30.95	0.07
Construction Equipment	Backhoe	15,862	3,031,512	6,683	0.44	84.78	0.19	0.17	32.10	0.07	3.02	576.62	1.27
	Blade	73,223	13,994,143	30,852	0.09	16.83	0.04	0.31	58.35	0.13	0.74	140.81	0.31
	RT Crane	54,272	10,372,251	22,867	0.15	28.98	0.06	0.28	53.98	0.12	1.75	333.75	0.74
	Dozer	74,585	14,254,407	31,426	0.09	17.92	0.04	0.37	70.03	0.15	1.89	361.25	0.80
	Excavator	73,888	14,121,329	31,132	0.07	14.19	0.03	0.36	68.86	0.15	0.82	157.08	0.35
	RT Forklift	21,596	4,127,281	9,099	0.37	70.19	0.15	0.10	18.97	0.04	1.22	233.07	0.51
	Generator	11,243	2,148,759	4,737	0.24	45.16	0.10	0.08	14.59	0.03	0.89	169.82	0.37
	Sideboom	94,055	17,975,454	39,629	0.64	121.52	0.27	0.47	88.99	0.20	1.75	333.75	0.74
	Skid Truck	77,373	14,787,289	32,600	0.05	10.09	0.02	0.28	53.98	0.12	6.73	1,286	2.84
	Tack Rig	74,585	14,254,407	31,426	0.09	17.92	0.04	0.39	74.40	0.16	1.89	361.25	0.80
	Water Truck	77,373	14,787,289	32,600	0.05	10.09	0.02	0.28	53.98	0.12	6.73	1,286	2.84
	Welding Machine	12,003	2,293,881	5,057	0.25	47.90	0.11	0.05	10.21	0.02	7.84	1,499	3.30
	Welding Truck	77,373	14,787,289	32,600	0.05	10.09	0.02	0.46	87.53	0.19	6.73	1,286	2.84

Denbury Snowy River CO2 Project Emissions
Group 5 Flowline Construction

Activity 5: X Ray										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	25,693	56.64	0.42	1,782	3.93
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Generator	10.00	4.0	0.33	5.26	63.07				10.10	637.14	1.40	17.23	1,087	2.40
	X-Ray Truck	100.00	4.0	0.33	5.26	63.07				2.80	176.89	0.39	16.14	1,018	2.24

Activity 6: Testing										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	5,839	12.87	0.42	405.07	0.89
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04
Construction Equipment	Air Compressor/Dryer	400.00	2.0	0.10	1.59	19.11				37.95	725.26	1.60	140.25	2,680	5.91
	RT Forklift	65.00	2.0	0.10	1.59	19.11				12.90	246.46	0.54	95.48	1,825	4.02
	Generator	50.00	2.0	0.10	1.59	19.11				5.34	102.01	0.22	48.26	922.36	2.03

Activity 7: Backfill										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	87,591	193.10	0.42	6,076	13.40
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	260.00	2.0	1.00	15.93	191.12				4.95	946.02	2.09	20.71	3,958	8.73
	Dozer	240.00	2.0	1.00	15.93	191.12				5.30	1,013	2.23	21.66	4,139	9.12
	Excavator	236.00	2.0	1.00	15.93	191.12				4.15	792.28	1.75	18.73	3,580	7.89
	Generator	50.00	1.0	1.00	15.93	191.12				5.34	1,020	2.25	48.26	9,224	20.33
	Roller	145.00	2.0	1.00	15.93	191.12				10.67	2,039	4.50	25.19	4,814	10.61

Activity 8: Corrosion Protection										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						5	1	100	6.11	16,058	35.40	0.42	1,114	2.46
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Air Compressor	85.00	2.0	0.33	5.26	63.07				9.84	620.65	1.37	43.11	2,719	5.99
	Generator	10.00	1.0	0.33	5.26	63.07				10.10	637.14	1.40	17.23	1,087	2.40
	Paint Truck	185.00	2.0	0.33	5.26	63.07				2.80	176.89	0.39	16.14	1,018	2.24

Activity 9: Reclaim										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	233,575	514.95	0.42	16,203	35.72
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Backhoe	110.00	4.0	2.00	31.85	382.23				27.40	10,473	23.09	41.31	15,788	34.81
	Blade	200.00	4.0	2.00	31.85	382.23				4.95	1,892	4.17	20.71	7,915	17.45
	Farm Tractor	190.00	4.0	2.00	31.85	382.23				2.80	1,072	2.36	16.14	6,170	13.60

Denbury Snowy River CO2 Project Emissions
Group 5 Flowline Construction

Activity 5: X Ray		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	706.07	1.56	0.14	578.25	1.27	0.05	201.82	0.44	0.29	1,225	2.70
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Generator	0.98	61.52	0.14	0.95	59.67	0.13	8.91E-03	0.56	1.24E-03	3.45	217.50	0.48
	X-Ray Truck	0.92	58.19	0.13	0.89	56.45	0.12	0.20	12.85	0.03	1.37	86.61	0.19

Activity 6: Testing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	160.47	0.35	0.14	131.42	0.29	0.05	45.87	0.10	0.29	278.46	0.61
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36
Construction Equipment	Air Compressor/Dryer	6.17	118.01	0.26	5.99	114.47	0.25	0.25	4.81	0.01	8.14	155.58	0.34
	RT Forklift	1.43	27.27	0.06	1.38	26.46	0.06	0.06	1.12	2.47E-03	2.57	49.14	0.11
	Generator	0.40	7.66	0.02	0.39	7.43	0.02	0.03	0.57	1.25E-03	1.77	33.79	0.07

Activity 7: Backfill		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	2,407	5.31	0.14	1,971	4.35	0.05	688.02	1.52	0.29	4,177	9.21
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	249.10	0.55	1.26	241.63	0.53	0.19	37.03	0.08	1.65	315.30	0.70
	Dozer	1.38	263.37	0.58	1.34	255.47	0.56	0.20	37.74	0.08	1.72	328.89	0.73
	Excavator	1.16	221.40	0.49	1.12	214.75	0.47	0.20	37.30	0.08	1.54	294.31	0.65
	Generator	0.40	76.64	0.17	0.39	74.34	0.16	0.03	5.66	0.01	1.77	337.92	0.74
	Roller	2.72	519.76	1.15	2.64	504.16	1.11	0.11	21.56	0.05	1.67	319.03	0.70

Activity 8: Corrosion Protection		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	441.30	0.97	0.14	361.41	0.80	0.05	126.14	0.28	0.29	765.76	1.69
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Air Compressor	1.74	109.68	0.24	1.69	106.39	0.23	0.06	3.74	8.24E-03	1.14	72.02	0.16
	Generator	0.98	61.52	0.14	0.95	59.67	0.13	8.91E-03	0.56	1.24E-03	3.45	217.50	0.48
	Paint Truck	0.92	58.19	0.13	0.89	56.45	0.12	0.20	12.85	0.03	1.37	86.61	0.19

Activity 9: Reclaim		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	6,419	14.15	0.14	5,257	11.59	0.05	1,835	4.04	0.29	11,138	24.56
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Backhoe	6.46	2,470	5.44	6.27	2,396	5.28	0.05	18.32	0.04	6.65	2,543	5.61
	Blade	1.30	498.21	1.10	1.26	483.26	1.07	0.19	74.06	0.16	1.65	630.60	1.39
	Farm Tractor	0.92	352.67	0.78	0.89	342.09	0.75	0.20	77.88	0.17	1.37	524.89	1.16

Denbury Snowy River CO2 Project Emissions
Group 5 Flowline Construction

Activity 5: X Ray		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	786,255	1,733	0.03	118.57	0.26	8.40E-03	35.32	0.08	2.30E-03	9.69	0.02
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Generator	2,422	152,757	336.77	0.30	19.17	0.04	0.02	0.96	2.12E-03	0.89	56.04	0.12
	X-Ray Truck	77,373	4,879,805	10,758	0.05	3.33	7.34E-03	0.15	9.63	0.02	6.73	424.48	0.94

Activity 6: Testing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	178,694	393.95	0.03	26.95	0.06	8.40E-03	8.03	0.02	2.30E-03	2.20	4.85E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	86,983	191.76	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Air Compressor/Dryer	88,895	1,698,940	3,746	0.62	11.87	0.03	0.61	11.67	0.03	0.89	16.98	0.04
	RT Forklift	21,596	412,728	909.91	0.37	7.02	0.02	0.10	1.90	4.18E-03	1.22	23.31	0.05
	Generator	11,243	214,876	473.72	0.24	4.52	0.01	0.08	1.46	3.22E-03	0.89	16.98	0.04

Activity 7: Backfill		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	2,680,413	5,909	0.03	404.21	0.89	8.40E-03	120.40	0.27	2.30E-03	33.03	0.07
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	13,994,143	30,852	0.09	16.83	0.04	0.40	75.86	0.17	0.74	140.81	0.31
	Dozer	74,585	14,254,407	31,426	0.09	17.92	0.04	0.37	70.03	0.15	1.89	361.25	0.80
	Excavator	73,888	14,121,329	31,132	0.07	14.19	0.03	0.36	68.86	0.15	0.82	157.08	0.35
	Generator	11,243	2,148,759	4,737	0.24	45.16	0.10	0.08	14.59	0.03	0.89	169.82	0.37
	Roller	41,867	8,001,483	17,640	0.13	25.48	0.06	0.22	42.31	0.09	1.19	227.23	0.50

Activity 8: Corrosion Protection		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	491,409	1,083	0.03	74.11	0.16	8.40E-03	22.07	0.05	2.30E-03	6.06	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Air Compressor	21,856	1,378,457	3,039	0.10	6.04	0.01	0.13	8.18	0.02	0.89	56.04	0.12
	Generator	2,422	152,757	336.77	0.30	19.17	0.04	0.02	0.96	2.12E-03	0.89	56.04	0.12
	Paint Truck	77,373	4,879,805	10,758	0.05	3.33	7.34E-03	0.28	17.81	0.04	6.73	424.48	0.94

Activity 9: Reclaim		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	7,147,768	15,758	0.03	1,078	2.38	8.40E-03	321.08	0.71	2.30E-03	88.08	0.19
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Backhoe	15,862	6,063,024	13,367	0.44	169.56	0.37	0.17	64.19	0.14	3.02	1,153	2.54
	Blade	73,223	27,988,286	61,704	0.09	33.66	0.07	0.31	116.71	0.26	0.74	281.61	0.62
	Farm Tractor	77,373	29,574,578	65,201	0.05	20.18	0.04	0.29	110.87	0.24	6.73	2,573	5.67

Denbury Snowy River CO2 Project Emissions
Group 5 Pump Station Construction

Total Acres Disturbed **5.00**

Activity 1: Clearing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	4,889	10.78	0.42	339.12	0.75
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Backhoe				0.00E+00	0.00E+00									
	Blade	300.00	2.00	0.20	1.00	12.00				4.95	59.40	0.13	20.71	248.50	0.55
	Dozer	400.00	3.00	0.20	1.00	12.00				41.39	496.62	1.09	98.38	1,181	2.60
	Scraper	400.00	3.00	0.20	1.00	12.00				43.35	520.16	1.15	102.59	1,231	2.71

Activity 2: Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	48,886	107.78	0.42	3,391	7.48
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						0.00E+00	2	100	1.65	0.00E+00	0.00E+00	4.58	0.00E+00	0.00E+00
Construction Equipment	Blade	300.00	2.00	2.00	10.00	120.00				4.95	594.00	1.31	20.71	2,485	5.48
	Dozer	400.00	3.00	2.00	10.00	120.00				41.39	4,966	10.95	98.38	11,805	26.03
	Scraper	400.00	3.00	2.00	10.00	120.00				43.35	5,202	11.47	102.59	12,310	27.14

Activity 3: Pump Station Construction

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days total)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	302,485	666.86	0.42	20,983	46.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5.34	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22.17	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7.29	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26.24	12,594	27.77	65.08	31,241	68.87
	Forklift	115.00	1.00	55.00	55.00	660.00				3.94	2,598	5.73	13.47	8,887	19.59
	Generator	25.00	3.00	55.00	55.00	660.00				14.43	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				25.84	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 5 Pump Station Construction

Total Acres Disturbed 5.00

Activity 1: Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	134.34	0.30	0.14	110.02	0.24	0.05	38.40	0.08	0.29	233.12	0.51
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Backhoe												
	Blade	1.30	15.64	0.03	1.26	15.17	0.03	0.19	2.33	5.13E-03	1.65	19.80	0.04
	Dozer	7.76	93.16	0.21	7.53	90.36	0.20	0.37	4.42	0.01	7.10	85.17	0.19
	Scraper	8.06	96.67	0.21	7.81	93.77	0.21	0.37	4.40	0.01	7.34	88.09	0.19

Activity 2: Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,343	2.96	0.14	1,100	2.43	0.05	384.00	0.85	0.29	2,331	5.14
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	0.00E+00	0.00E+00	0.09	0.00E+00	0.00E+00	0.01	0.00E+00	0.00E+00	0.41	0.00E+00	0.00E+00
Construction Equipment	Blade	1.30	156.41	0.34	1.26	151.72	0.33	0.19	23.25	0.05	1.65	197.97	0.44
	Dozer	7.76	931.56	2.05	7.53	903.61	1.99	0.37	44.23	0.10	7.10	851.74	1.88
	Scraper	8.06	966.72	2.13	7.81	937.72	2.07	0.37	44.04	0.10	7.34	880.85	1.94

Activity 3: Pump Station Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	8,313	18.33	0.14	6,808	15.01	0.05	2,376	5.24	0.29	14,424	31.80
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Forklift	0.88	578.98	1.28	0.85	561.61	1.24	0.11	74.64	0.16	0.66	432.85	0.95
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66	1,754	3.87	0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 5 Pump Station Construction

Total Acres Disturbed **5.00**

Activity 1: Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	149,600	329.81	0.03	22.56	0.05	8.40E-03	6.72	0.01	2.30E-03	1.84	4.06E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	73,223	878,676	1,937	0.09	1.06	2.33E-03	0.46	5.50	0.01	0.74	8.84	0.02
	Dozer	134,685	1,616,221	3,563	0.51	6.11	0.01	0.61	7.33	0.02	1.89	22.68	0.05
	Scraper	133,797	1,605,567	3,540	0.53	6.37	0.01	0.61	7.33	0.02	3.04	36.51	0.08

Activity 2: Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,496,000	3,298	0.03	225.60	0.50	8.40E-03	67.20	0.15	2.30E-03	18.43	0.04
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	0.00E+00	0.00E+00	0.46	0.00E+00	0.00E+00	2.00E-03	0.00E+00	0.00E+00	3.77E-03	0.00E+00	0.00E+00
Construction Equipment	Blade	73,223	8,786,758	19,371	0.09	10.57	0.02	0.46	54.96	0.12	0.74	88.41	0.19
	Dozer	134,685	16,162,214	35,632	0.51	61.10	0.13	0.61	73.28	0.16	1.89	226.83	0.50
	Scraper	133,797	16,055,671	35,397	0.53	63.68	0.14	0.61	73.28	0.16	3.04	365.09	0.80

Activity 3: Pump Station Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	9,256,500	20,407	0.03	1,396	3.08	8.40E-03	415.80	0.92	2.30E-03	114.06	0.25
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	6.79	0.01
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89	586.46	1.29
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Forklift	42,947	28,344,784	62,490	0.05	30.16	0.07	0.18	115.87	0.26	0.57	373.49	0.82
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 5 Road Maintenance and Construction

New Roads

Miles **0.23**

Activity 1: Road Clear										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	5,500	12.12	0.42	381.51	0.84
	Heavy Duty Truck (Other listed activites)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor/Dryer				0.00E+00	0.00E+00									
	Blade	300.00	3.00	2.00	0.46	5.52				4.95	27.32	0.06	20.71	114.31	0.25
	Dozer	400.00	3.00	2.00	0.46	5.52				41.39	228.45	0.50	98.38	543.04	1.20
	Scraper	400.00	3.00	2.00	0.46	5.52				43.35	239.27	0.53	102.59	566.28	1.25

Activity 2: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	7,333	16.17	0.42	508.68	1.12
	Heavy Duty Truck (Other listed activites)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	300.00	2.00	2.00	0.46	5.52				4.95	27.32	0.06	20.71	114.31	0.25
	Dozer	400.00	3.00	2.00	0.46	5.52				41.39	228.45	0.50	98.38	543.04	1.20
	Dump Truck	350.00	4.00	2.00	0.46	5.52				7.76	42.85	0.09	33.63	185.64	0.41
	Scraper	400.00	3.00	2.00	0.46	5.52				43.35	239.27	0.53	102.59	566.28	1.25

Two-Tracks Road Modifications

Miles **4.77**

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	69,956	154.23	0.42	4,853	10.70
	Heavy Duty Truck (Other listed activites)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						12	2	100	1.65	3,963	8.74	4.58	10,997	24.24
Construction Equipment	Blade	300.00	2.00	2.00	9.54	114.48				4.95	566.67	1.25	20.71	2,371	5.23
	Dozer	400.00	3.00	2.00	9.54	114.48				41.39	4,738	10.45	98.38	11,262	24.83
	Dump Truck	350.00	4.00	2.00	9.54	114.48				7.76	888.57	1.96	33.63	3,850	8.49
	Scraper	400.00	3.00	2.00	9.54	114.48				43.35	4,962	10.94	102.59	11,744	25.89

Existing Roads

Miles **17.99**

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						2	1	100	6.11	43,373	96.94	0.42	3,050	6.72
	Heavy Duty Truck (Other listed activites)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04
Construction Equipment	Blade	300.00	2.00	2.00	35.98	431.76				4.95	2,137	4.71	20.71	8,941	19.71

Denbury Snowy River CO2 Project Emissions
Group 5 Road Maintenance and Construction

New Roads

Miles **0.23**

Activity 1: Road Clear		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	151.14	0.33	0.14	123.78	0.27	0.05	43.20	0.10	0.29	262.26	0.58
	Heavy Duty Truck (Other listed activites)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor/Dryer												
	Blade	1.30	7.19	0.02	1.26	6.98	0.02	0.19	1.07	2.36E-03	1.65	9.11	0.02
	Dozer	7.76	42.85	0.09	7.53	41.57	0.09	0.37	2.03	4.49E-03	7.10	39.18	0.09
	Scraper	8.06	44.47	0.10	7.81	43.14	0.10	0.37	2.03	4.47E-03	7.34	40.52	0.09

Activity 2: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	201.52	0.44	0.14	165.04	0.36	0.05	57.60	0.13	0.29	349.68	0.77
	Heavy Duty Truck (Other listed activites)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	7.19	0.02	1.26	6.98	0.02	0.19	1.07	2.36E-03	1.65	9.11	0.02
	Dozer	7.76	42.85	0.09	7.53	41.57	0.09	0.37	2.03	4.49E-03	7.10	39.18	0.09
	Dump Truck	2.08	11.46	0.03	2.01	11.12	0.02	0.35	1.94	4.28E-03	2.72	15.01	0.03
	Scraper	8.06	44.47	0.10	7.81	43.14	0.10	0.37	2.03	4.47E-03	7.34	40.52	0.09

Two-Tracks Road Modifications

Miles **4.77**

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,922	4.24	0.14	1,574	3.47	0.05	549.50	1.21	0.29	3,336	7.35
	Heavy Duty Truck (Other listed activites)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	347.45	0.77	0.09	206.02	0.45	0.01	35.76	0.08	0.41	972.24	2.14
Construction Equipment	Blade	1.30	149.21	0.33	1.26	144.74	0.32	0.19	22.18	0.05	1.65	188.87	0.42
	Dozer	7.76	888.71	1.96	7.53	862.04	1.90	0.37	42.20	0.09	7.10	812.56	1.79
	Dump Truck	2.08	237.71	0.52	2.01	230.58	0.51	0.35	40.22	0.09	2.72	311.25	0.69
	Scraper	8.06	922.25	2.03	7.81	894.59	1.97	0.37	42.02	0.09	7.34	840.33	1.85

Existing Roads

Miles **17.99**

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,208	2.66	0.14	989.67	2.18	0.05	345.41	0.76	0.29	2,097	4.62
	Heavy Duty Truck (Other listed activites)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36
Construction Equipment	Blade	1.30	562.76	1.24	1.26	545.88	1.20	0.19	83.66	0.18	1.65	712.30	1.57

Denbury Snowy River CO2 Project Emissions
Group 5 Road Maintenance and Construction

New Roads

Miles 0.23

Activity 1: Road Clear		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	168,300	371.04	0.03	25.38	0.06	8.40E-03	7.56	0.02	2.30E-03	2.07	4.57E-03
	Heavy Duty Truck (Other listed activites)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	6.79	0.01
Construction Equipment	Air Compressor/Dryer							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	73,223	404,191	891.09	0.09	0.49	1.07E-03	0.46	2.53	5.57E-03	0.74	4.07	8.97E-03
	Dozer	134,685	743,462	1,639	0.51	2.81	6.20E-03	0.61	3.37	7.43E-03	1.89	10.43	0.02
	Scraper	133,797	738,561	1,628	0.53	2.93	6.46E-03	0.61	3.37	7.43E-03	3.04	16.79	0.04

Activity 2: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	224,400	494.72	0.03	33.84	0.07	8.40E-03	10.08	0.02	2.30E-03	2.77	6.10E-03
	Heavy Duty Truck (Other listed activites)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	404,191	891.09	0.09	0.49	1.07E-03	0.46	2.53	5.57E-03	0.74	4.07	8.97E-03
	Dozer	134,685	743,462	1,639	0.51	2.81	6.20E-03	0.61	3.37	7.43E-03	1.89	10.43	0.02
	Dump Truck	132,987	734,086	1,618	0.13	0.71	1.57E-03	0.53	2.95	6.50E-03	6.73	37.15	0.08
	Scraper	133,797	738,561	1,628	0.53	2.93	6.46E-03	0.61	3.37	7.43E-03	3.04	16.79	0.04

Two-Tracks Road Modifications

Miles 4.77

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	2,140,776	4,720	0.03	322.83	0.71	8.40E-03	96.16	0.21	2.30E-03	26.38	0.06
	Heavy Duty Truck (Other listed activites)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	521,896	1,151	0.46	1,112	2.45	2.00E-03	4.80	0.01	3.77E-03	9.06	0.02
Construction Equipment	Blade	73,223	8,382,568	18,480	0.09	10.08	0.02	0.46	52.43	0.12	0.74	84.34	0.19
	Dozer	134,685	15,418,753	33,993	0.51	58.29	0.13	0.61	69.91	0.15	1.89	216.39	0.48
	Dump Truck	132,987	15,224,296	33,564	0.13	14.80	0.03	0.53	61.17	0.13	6.73	770.51	1.70
	Scraper	133,797	15,317,110	33,768	0.53	60.75	0.13	0.61	69.91	0.15	3.04	348.30	0.77

Existing Roads

Miles 17.99

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,345,652	2,967	0.03	202.93	0.45	8.40E-03	60.45	0.13	2.30E-03	16.58	0.04
	Heavy Duty Truck (Other listed activites)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	86,983	191.76	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Blade	73,223	31,614,757	69,699	0.09	38.02	0.08	0.46	197.75	0.44	0.74	318.10	0.70

Denbury Snowy River CO2 Project Emissions
Group 5 Fugitive Dust Emissions from Paved Roads

Summary of Fugitive Emissions

Paved Roads emission factor from AP-42, Section 13.2.1: *Paved Roads* (01/11)

$$E = k(sL)^{0.91}(W)^{1.02}(1-P/(4*365))$$

where:

sL =	0.6	road surface silt loading silt loading (g/m2) [Table 13.2.1-2, for Ubiquitous Baseline, <500]
W_{LDT} =	4	tons [Average vehicle weight]
$W_{Tractor}$ =	25	tons [Average vehicle weight]
k =	0.0022	lb/VMT [Table 13.2.1-1, for PM_{10}]
k =	0.00054	lb/VMT [Table 13.2.1-1, for $PM_{2.5}$]
P =	100	days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.1-2]

1/2 Ton Trucks (light-duty trucks)

$E_{(PM10)}$ = 5.29E-03 lb/VMT

$E_{(PM2.5)}$ = 1.30E-03 lb/VMT

126	Duration of Construction (days)-Well Pad Construction
140	Duration of Construction (days)-Flow/Bulk Line Construction
66	Duration of Construction (days)-Pump Station Construction
46	Duration of Construction (days)-Road Construction (existing and two-track roads)

Tractor Trailers

$E_{(PM10)}$ = 3.43E-02 lb/VMT

$E_{(PM2.5)}$ = 8.43E-03 lb/VMT

2	Equipment Delivery (days) -Well Pad Construction
2	Equipment Delivery (days) -Flow/Bulk Line Construction
2	Equipment Delivery (days) -Pump Station Construction
2	Equipment Delivery (days) -Road Construction (existing and two-track roads)

Project Segment

Equipment Type	Average Vehicle Weight (tons)[a]	Well Pad Construction			Flow/Bulk Line Construction			Pump Station Construction			Road Construction		
		VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]
Light Duty Trucks	4	100	22	277288	100	135	1883456	100	25	165000	100	14	63728
Tractor Trailers	25	100	21	4200	100	106	21200	100	17	3400	100	14	2800
Total VMT				281488			1904656			168400			66528
a - Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.													
PM10 (tons)				**0.81**			**5.35**			**0.50**			**0.22**
PM2.5 (tons)				**0.20**			**1.31**			**0.12**			**0.05**

Project Totals

Total Paved Road Emissions	
Pollutant	**tons**
PM_{10}	**6.87**
$PM_{2.5}$	**1.69**

[a] *Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.*

[b] VMT per day are projected based on experience from previous construction projects.

[c] Vehicle Miles Traveled (VMT) are based on the vehicle quantity , project duration, and experience from previous construction projects.

Denbury Snowy River CO2 Project Emissions
Group 5 Fugitive Dust Emissions from Unpaved Roads

Summary of Fugitive Emissions

Unpaved Roads emission factor from AP-42, Section 13.2.2: *Unpaved Roads* (11/06); Equations a1 and 2

$$E = k\,(s/12)^a (W/3)^b \qquad (1a)$$

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight

Table 13.2.2-2 - Constants for Equation 1a

Constant	PM2.5	PM10
k (lb/VMT)	0.15	1.5
a	0.9	0.9
b	0.45	0.45

Surface Silt (s) content based on Table 13.2.2-1 - construction sites

s = 8.50

$$E_{ext} = E\,[(365 - P)/365] \qquad (2)$$

E_{ext} = annual size-specific emisison factor extrapolated for natural mitigation, lb/VMT
E = emisison factor from Equation 1a
P = days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.2-1

P = 100

Equipment	Construction Duration (days)	Miles per Day	Quantity	Total Vehicle Miles Traveled[a] (VMT)	W: Mean Vehicle Weight (tons)[b]	Emission Factors (lb/VMT)[c]		Emissions (tons)		Controlled Emissions (tons)	
						PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Well Pad Construction											
1/2 Ton Trucks	2.92	100	0	4,532	12.02941176	1.492	0.149	3.380	0.338	1.7	0.2
							Total (tons)	**3.380**	**0.338**	**1.7**	**0.2**

(a) VMT per day are projected based on experience from previous construction projects
(b) Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.
(c) AP 42 Section 13.2.2 Unpaved Roads, dated November 2006, Equations 1a and 2

Denbury Snowy River CO2 Project Emissions
Group 5 Fugitive Dust Emissions from Earthmoving Activities

Construction Activity	Activity Type	Approximate Pipeline Length or Road Length (mi)	Excavation Volume[a] (ft^3)	Temporary Workspace for Construction (acres)[b]
Flowline Injection Well 10	Pipeline	0.06	5,962	0.05
Flowline Injection Well 11	Pipeline	2.37	225,373	1.72
Bulkline 2 Injection Wells 08 09 10 11 12 13 14 15	Pipeline	13.49	1,282,310	9.81
BLM Two-Track Injection Well 10	Access Roads	2.66	421,344	9.67
BLM Two-Track Injection Well 11	Access Roads	2.11	334,224	7.67
New Road Injection Well 10	Access Roads	0.07	11,088	0.25
New Road Injection Well 11	Access Roads	0.16	25,344	0.58
Ridge Road Existing Gravel Road on BLM	Access Roads	14.9	2,360,160	54.18
Hammond Road Existing Gravel to Highway 323	Access Roads	3.09	489,456	11.24
Injection Well 10 Construction Pad	Well Pad Construction	--	601,128	4.6
Injection Well 11 Construction Pad	Well Pad Construction	--	601,128	4.6
Pump Station South	Pump Station Construction	--	653,400	5

Project Construction Activity Particulate Matter Emissions

Construction Activity	Excavation[a] (tons)	Excavation PM_{10} Emission Factor[c] (lb/ton)	Pipeline Excavation PM_{10} Emissions (tons)	Backfilling[a] (tons)	Backfilling PM_{10} Emission Factor[b] (lb/ton)	Backfilling PM10 Emissions (tpy)	Windblown Dust Area (acre)	PM_{10} Windblown Dust Emission Factor[d,e] (tons/acre)	Windblown Dust PM_{10} Emissions - Uncontrolled (tons)	Total Construction Activity PM_{10} emissions (tons)	Total Controlled Construction Activity PM_{10} emissions[g] (tons)	Total Construction Activity $PM_{2.5}$ emissions[f] (tons)	Total Controlled Construction Activity $PM_{2.5}$ emissions[g] (tons)
Flowline Injection Well 10	298	0.058	0.009	298	0.012	0.002	0.05	3.80E-01	0.02	0.028	0.014	0.006	0.003
Flowline Injection Well 11	11,269	0.058	0.327	11,269	0.012	0.068	1.72	3.80E-01	0.66	1.050	0.525	0.218	0.109
Bulkline 2 Injection Wells 08 09 10 11 12 13 14 15	64,116	0.058	1.859	64,116	0.012	0.385	9.81	3.80E-01	3.73	5.973	2.986	1.242	0.621
BLM Two-Track Injection Well 10	21,067	0.058	0.611	21,067	0.012	0.126	9.67	3.80E-01	3.68	4.413	2.206	0.918	0.459
BLM Two-Track Injection Well 11	16,711	0.058	0.485	16,711	0.012	0.100	7.67	3.80E-01	2.92	3.501	1.750	0.728	0.364
New Road Injection Well 10	554	0.058	0.016	554	0.012	0.003	0.25	3.80E-01	0.10	0.116	0.058	0.024	0.012
New Road Injection Well 11	1,267	0.058	0.037	1,267	0.012	0.008	0.58	3.80E-01	0.22	0.265	0.133	0.055	0.028
Ridge Road Existing Gravel Road on BLM	118,008	0.058	3.422	118,008	0.012	0.708	54.18	3.80E-01	20.59	24.719	12.360	5.142	2.571
Hammond Road Existing Gravel to Highway 323	24,473	0.058	0.710	24,473	0.012	0.147	11.24	3.80E-01	4.27	5.126	2.563	1.066	0.533
Injection Well 10 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.60	3.80E-01	1.75	2.800	1.400	0.582	0.291
Injection Well 11 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.60	3.80E-01	1.75	2.800	1.400	0.582	0.291
Pump Station South	32,670	0.058	0.947	32,670	0.012	0.196	5.00	3.80E-01	1.90	3.043	1.522	0.633	0.317
									Total	**53.835**	**26.917**	**11.198**	**5.599**

(a) Excavation of well pad sites assumed to be 3 feet deep. Excavation and backfilling assumes pipeline will be 6 ft x 3 ft x approximate length (ft) for the Project component. Excavation for road construction assumes road excavation is 30 ft width x 1 ft deep x approximate road length (ft). Soil density is assumed to be 100 lb/ft^3

(b) Temporary workspace acres for roadways assumed to be 30 ft width x approximate road length (mi).

(c) Excavation and backfilling factors from AP-42, Table 11.9-4 (dated 7/98), assuming 100% of TSP is PM_{10}

(d) Windblown dust factor from AP-42 Table 11.9-4 Uncontrolled Particulate Emission Factors for Open Dust Sources

(e) PM_{10} emissions are conservatively assumed to be 100% of TSP.

(f) $PM_{2.5}$ emissions were calculated following the SCAQMD Particulate Matter $PM_{2.5}$ Significance Thresholds and Calculation Methodology (2006). For construction and demolition fugitive dust sources, 20.8% of the PM_{10} would be $PM_{2.5}$

(g) Controls are conservatively assumed to have a 50% reduction factor based on Emission Factors for Paved and Unpaved Roads (1/2015) Utah DEQ

Denbury Snowy River CO2 Project Emissions
Construction Group 6 Emissions Summary

Uncontrolled Emissions Summary (U.S. Tons Total)

Category	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-year GWP CO_2e	100- year GWP CO_2e	HAPS
Well Construction	0.67	0.42	0.03	0.03	5.06E-03	0.05	299.58	6.28E-03	5.11E-03	301.49	301.16	5.70E-03
Flow/Bulk Line Construction	0.14	0.11	6.23E-03	4.40E-03	1.13E-03	0.01	13.76	0.01	2.09E-04	14.71	14.14	4.00E-04
Road Construction	0.02	0.02	9.87E-04	7.51E-04	1.63E-04	2.06E-03	4.27	1.41E-03	4.58E-05	4.40	4.32	1.12E-04
Paved Roads			1.23	0.30								
Unpaved Roads			**3.19**	**0.32**								
Earthmoving			6.01	3.01								
Total	0.83	0.55	**10.47**	**3.66**	6.35E-03	0.06	317.60	0.02	5.37E-03	320.60	319.62	6.21E-03

Controlled Emissions Summary (U.S. Tons Total)

Category	PM_{10}	$PM_{2.5}$
Well Construction	0.03	0.03
Flow/Bulk Line Construction	6.23E-03	4.40E-03
Road Construction	9.87E-04	7.51E-04
Paved Roads	1.23	0.30
Unpaved Roads	1.60	0.16
Earthmoving	3.01	0.63
Controlled Total	5.87	1.12

Denbury Snowy River CO2 Project Emissions
Group 6 Wellpad Construction

Total Acres Disturbed 9.20

Activity 1: Drill Pad Clearing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						3	1	100	6.11	3,373	7.44	0.42	233.99	0.52
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						3	2	100	1.65	990.66	2.18	4.58	2,749	6.06
Construction Equipment	Backhoe					0.00E+00									
	Dozer	153.00	2.00	0.20	1.84	22.08				6.06	133.89	0.30	19.27	425.53	0.94
	Excavator	160.00	1.00	0.20	1.84	22.08				5.28	116.67	0.26	17.08	377.21	0.83

Activity 2: Drill Pad Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	33,732	74.37	0.42	2,340	5.16
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						5	2	100	1.65	1,651	3.64	4.58	4,582	10.10
Construction Equipment	Blade	140.00	1.00	0.25	2.30	27.60				6.09	167.98	0.37	19.47	537.36	1.18
	Dozer	153.00	1.00	1.00	9.20	110.40				6.06	669.43	1.48	19.27	2,128	4.69
	Roller Compactor	156.00	1.00	0.25	2.30	27.60				10.67	294.50	0.65	25.19	695.26	1.53
	Scraper	400.00	3.00	1.00	9.20	110.40				43.35	4,785	10.55	102.59	11,326	24.97

Activity 3: Drill Pad Drilling

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						4	1	100	6.11	146,659	323.33	0.42	10,174	22.43
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment (Drill Rig)	Generator	3,000	4.00	60.00	60.00	720.00				88.22	63,515	140.03	234.63	168,931	372.43

Activity 4: Drill Pad Construction

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	302,485	666.86	0.42	20,983	46.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5.34	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22.17	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7.29	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26.24	12,594	27.77	65.08	31,241	68.87
	Generator	25.00	3.00	55.00	55.00	660.00				14.43	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				25.84	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 6 Wellpad Construction

Total Acres Disturbed 9.20

Activity 1: Drill Pad Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	92.70	0.20	0.14	75.92	0.17	0.05	26.50	0.06	0.29	160.85	0.35
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	86.86	0.19	0.09	51.50	0.11	0.01	8.94	0.02	0.41	243.06	0.54
Construction Equipment	Backhoe												
	Dozer	1.45	31.98	0.07	1.40	31.02	0.07	0.11	2.52	5.56E-03	0.96	21.23	0.05
	Excavator	1.24	27.28	0.06	1.20	26.46	0.06	0.12	2.54	5.61E-03	0.85	18.80	0.04

Activity 2: Drill Pad Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	926.97	2.04	0.14	759.17	1.67	0.05	264.96	0.58	0.29	1,609	3.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	144.77	0.32	0.09	85.84	0.19	0.01	14.90	0.03	0.41	405.10	0.89
Construction Equipment	Blade	1.45	39.96	0.09	1.40	38.76	0.09	0.12	3.26	7.19E-03	0.97	26.71	0.06
	Dozer	1.45	159.90	0.35	1.40	155.10	0.34	0.11	12.62	0.03	0.96	106.15	0.23
	Roller Compactor	2.72	75.06	0.17	2.64	72.81	0.16	0.11	3.11	6.87E-03	1.67	46.07	0.10
	Scraper	8.06	889.39	1.96	7.81	862.70	1.90	0.37	40.52	0.09	7.34	810.38	1.79

Activity 3: Drill Pad Drilling		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	4,030	8.89	0.14	3,301	7.28	0.05	1,152	2.54	0.29	6,994	15.42
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment (Drill Rig)	Generator	10.64	7,661	16.89	10.32	7,431	16.38	0.42	302.18	0.67	13.21	9,510	20.97

Activity 4: Drill Pad Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	8,313	18.33	0.14	6,808	15.01	0.05	2,376	5.24	0.29	14,424	31.80
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66	1,754	3.87	0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 6 Wellpad Construction

Total Acres Disturbed 9.20

Activity 1: Drill Pad Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	103,224	227.57	0.03	15.57	0.03	8.40E-03	4.64	0.01	2.30E-03	1.27	2.80E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	130,474	287.65	0.46	278.04	0.61	2.00E-03	1.20	2.65E-03	3.77E-03	2.26	4.99E-03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Dozer	43,104	951,739	2,098	0.07	1.65	3.64E-03	0.23	5.16	0.01	1.89	41.74	0.09
	Excavator	43,580	962,237	2,121	0.06	1.41	3.11E-03	0.24	5.39	0.01	0.82	18.15	0.04

Activity 2: Drill Pad Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,032,240	2,276	0.03	155.66	0.34	8.40E-03	46.37	0.10	2.30E-03	12.72	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	217,457	479.41	0.46	463.40	1.02	2.00E-03	2.00	4.41E-03	3.77E-03	3.77	8.32E-03
Construction Equipment	Blade	44,593	1,230,761	2,713	0.07	2.06	4.55E-03	0.21	5.90	0.01	0.74	20.33	0.04
	Dozer	43,104	4,758,694	10,491	0.07	8.25	0.02	0.23	25.79	0.06	1.89	208.68	0.46
	Roller Compactor	41,867	1,155,529	2,548	0.13	3.68	8.11E-03	0.24	6.57	0.01	1.19	32.82	0.07
	Scraper	133,797	14,771,217	32,565	0.53	58.58	0.13	0.61	67.42	0.15	3.04	335.88	0.74

Activity 3: Drill Pad Drilling		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	4,488,000	9,894	0.03	676.80	1.49	8.40E-03	201.60	0.44	2.30E-03	55.30	0.12
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	1.25	2.75E-03
Construction Equipment (Drill Rig)	Generator	148,388	106,839,491	235,541	1.00	722.78	1.59	4.58	3,298	7.27	0.89	639.77	1.41

Activity 4: Drill Pad Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	9,256,500	20,407	0.03	1,396	3.08	8.40E-03	415.80	0.92	2.30E-03	114.06	0.25
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	1.25	2.75E-03
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89	586.46	1.29
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 6 Flowline Construction

Total Miles 0.18

Activity 1: Clearing ROW

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						16	1	100	6.11	9,777	21.56	0.42	678.24	1.50
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						16	2	100	1.65	5,284	11.65	4.58	14,662	32.32
Construction Equipment	Backhoe				0.00E+00	0.00E+00									
	Blade	260.00	2.0	2.00	0.37	4.40				4.95	21.78	0.05	20.71	91.12	0.20
	Dozer	240.00	8.0	2.00	0.37	4.40				5.30	23.32	0.05	21.66	95.29	0.21
	Water Truck	185.00	6.0	2.00	0.37	4.40				2.80	12.34	0.03	16.14	71.02	0.16

Activity 2: Trenching

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						15	1	100	6.11	9,166	20.21	0.42	635.85	1.40
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						15	2	100	1.65	4,953	10.92	4.58	13,746	30.30
Construction Equipment	Backhoe	110.00	1.0	1.00	0.18	2.20				27.40	60.28	0.13	41.31	90.88	0.20
	Excavator	236.00	11.0	1.00	0.18	2.20				4.15	9.12	0.02	18.73	41.21	0.09
	Trencher	420.00	3.0	1.00	0.18	2.20				167.78	369.14	0.81	342.02	752.46	1.66

Activity 3: Stringing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						10	1	100	6.11	6,111	13.47	0.42	423.90	0.93
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Excavator w/ Vacculift	428.00	2.0	1.00	0.18	2.20				26.24	57.73	0.13	65.08	143.19	0.32
	RT Forklift	65.00	2.0	1.00	0.18	2.20				12.90	28.37	0.06	95.48	210.07	0.46
	Generator	50.00	2.0	1.00	0.18	2.20				5.34	11.74	0.03	48.26	106.18	0.23
	Skid Truck	185.00	2.0	1.00	0.18	2.20				2.80	6.17	0.01	16.14	35.51	0.08
	Water Truck	185.00	2.0	1.00	0.18	2.20				2.80	6.17	0.01	16.14	35.51	0.08

Activity 4: Welding and Lower In

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						54	1	100	6.11	32,998	72.75	0.42	2,289	5.05
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						41	2	100	1.65	13,539	29.85	4.58	37,572	82.83
Construction Equipment	Backhoe	110.00	2.0	1.00	0.18	2.20				27.40	60.28	0.13	41.31	90.88	0.20
	Blade	200.00	2.0	1.00	0.18	2.20				4.95	10.89	0.02	20.71	45.56	0.10
	RT Crane	185.00	2.0	1.00	0.18	2.20				7.29	16.04	0.04	27.67	60.87	0.13
	Dozer	240.00	2.0	1.00	0.18	2.20				5.30	11.66	0.03	21.66	47.64	0.11
	Excavator	236.00	2.0	1.00	0.18	2.20				4.15	9.12	0.02	18.73	41.21	0.09
	RT Forklift	65.00	2.0	1.00	0.18	2.20				12.90	28.37	0.06	95.48	210.07	0.46
	Generator	50.00	2.0	1.00	0.18	2.20				5.34	11.74	0.03	48.26	106.18	0.23
	Sideboom	305.00	10.0	1.00	0.18	2.20				38.89	85.56	0.19	129.26	284.39	0.63
	Skid Truck	185.00	2.0	1.00	0.18	2.20				2.80	6.17	0.01	16.14	35.51	0.08
	Tack Rig	255.00	2.0	1.00	0.18	2.20				5.30	11.66	0.03	21.66	47.64	0.11
	Water Truck	185.00	2.0	1.00	0.18	2.20				2.80	6.17	0.01	16.14	35.51	0.08
	Welding Machine	35.00	14.0	1.00	0.18	2.20				5.79	12.74	0.03	51.09	112.39	0.25
	Welding Truck	300.00	10.0	1.00	0.18	2.20				2.80	6.17	0.01	16.14	35.51	0.08

Denbury Snowy River CO2 Project Emissions
Group 6 Flowline Construction

Total Miles 0.18

Activity 1: Clearing ROW		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	268.69	0.59	0.14	220.05	0.49	0.05	76.80	0.17	0.29	466.24	1.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	463.26	1.02	0.09	274.69	0.61	0.01	47.68	0.11	0.41	1,296	2.86
Construction Equipment	Backhoe												
	Blade	1.30	5.74	0.01	1.26	5.56	0.01	0.19	0.85	1.88E-03	1.65	7.26	0.02
	Dozer	1.38	6.06	0.01	1.34	5.88	0.01	0.20	0.87	1.92E-03	1.72	7.57	0.02
	Water Truck	0.92	4.06	8.95E-03	0.89	3.94	8.68E-03	0.20	0.90	1.98E-03	1.37	6.04	0.01

Activity 2: Trenching		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	251.90	0.56	0.14	206.30	0.45	0.05	72.00	0.16	0.29	437.10	0.96
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	434.31	0.96	0.09	257.52	0.57	0.01	44.70	0.10	0.41	1,215	2.68
Construction Equipment	Backhoe	6.46	14.22	0.03	6.27	13.79	0.03	0.05	0.11	2.33E-04	6.65	14.63	0.03
	Excavator	1.16	2.55	5.62E-03	1.12	2.47	5.45E-03	0.20	0.43	9.47E-04	1.54	3.39	7.47E-03
	Trencher	27.66	60.85	0.13	26.83	59.02	0.13	0.40	0.88	1.94E-03	23.86	52.48	0.12

Activity 3: Stringing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	167.93	0.37	0.14	137.53	0.30	0.05	48.00	0.11	0.29	291.40	0.64
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Excavator w/ Vacculift	5.40	11.88	0.03	5.24	11.52	0.03	0.35	0.77	1.70E-03	5.07	11.15	0.02
	RT Forklift	1.43	3.14	6.92E-03	1.38	3.05	6.71E-03	0.06	0.13	2.84E-04	2.57	5.66	0.01
	Generator	0.40	0.88	1.95E-03	0.39	0.86	1.89E-03	0.03	0.07	1.44E-04	1.77	3.89	8.58E-03
	Skid Truck	0.92	2.03	4.48E-03	0.89	1.97	4.34E-03	0.20	0.45	9.88E-04	1.37	3.02	6.66E-03
	Water Truck	0.92	2.03	4.48E-03	0.89	1.97	4.34E-03	0.20	0.45	9.88E-04	1.37	3.02	6.66E-03

Activity 4: Welding and Lower In		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	906.82	2.00	0.14	742.66	1.64	0.05	259.20	0.57	0.29	1,574	3.47
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	1,187	2.62	0.09	703.89	1.55	0.01	122.18	0.27	0.41	3,322	7.32
Construction Equipment	Backhoe	6.46	14.22	0.03	6.27	13.79	0.03	0.05	0.11	2.33E-04	6.65	14.63	0.03
	Blade	1.30	2.87	6.32E-03	1.26	2.78	6.13E-03	0.19	0.43	9.40E-04	1.65	3.63	8.00E-03
	RT Crane	1.70	3.74	8.24E-03	1.65	3.63	8.00E-03	0.15	0.32	7.10E-04	2.29	5.03	0.01
	Dozer	1.38	3.03	6.68E-03	1.34	2.94	6.48E-03	0.20	0.43	9.58E-04	1.72	3.79	8.35E-03
	Excavator	1.16	2.55	5.62E-03	1.12	2.47	5.45E-03	0.20	0.43	9.47E-04	1.54	3.39	7.47E-03
	RT Forklift	1.43	3.14	6.92E-03	1.38	3.05	6.71E-03	0.06	0.13	2.84E-04	2.57	5.66	0.01
	Generator	0.40	0.88	1.95E-03	0.39	0.86	1.89E-03	0.03	0.07	1.44E-04	1.77	3.89	8.58E-03
	Sideboom	6.83	15.02	0.03	6.62	14.57	0.03	0.27	0.59	1.30E-03	8.67	19.07	0.04
	Skid Truck	0.92	2.03	4.48E-03	0.89	1.97	4.34E-03	0.20	0.45	9.88E-04	1.37	3.02	6.66E-03
	Tack Rig	1.38	3.03	6.68E-03	1.34	2.94	6.48E-03	0.20	0.43	9.58E-04	1.72	3.79	8.35E-03
	Water Truck	0.92	2.03	4.48E-03	0.89	1.97	4.34E-03	0.20	0.45	9.88E-04	1.37	3.02	6.66E-03
	Welding Machine	0.45	1.00	2.20E-03	0.44	0.97	2.14E-03	0.03	0.07	1.54E-04	1.88	4.13	0.01
	Welding Truck	0.92	2.03	4.48E-03	0.89	1.97	4.34E-03	0.20	0.45	9.88E-04	1.37	3.02	6.66E-03

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Total Miles 0.18

Activity 1: Clearing ROW		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	299,200	659.62	0.03	45.12	0.10	8.40E-03	13.44	0.03	2.30E-03	3.69	8.13E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	695,862	1,534	0.46	1,483	3.27	2.00E-03	6.40	0.01	3.77E-03	12.08	0.03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	73,223	322,193	710.31	0.09	0.39	8.54E-04	0.40	1.75	3.85E-03	0.74	3.24	7.15E-03
	Dozer	74,585	328,185	723.52	0.09	0.41	9.09E-04	0.37	1.61	3.55E-03	1.89	8.32	0.02
	Water Truck	77,373	340,454	750.57	0.05	0.23	5.12E-04	0.28	1.24	2.74E-03	6.73	29.62	0.07

Activity 2: Trenching		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	280,500	618.40	0.03	42.30	0.09	8.40E-03	12.60	0.03	2.30E-03	3.46	7.62E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	652,370	1,438	0.46	1,390	3.06	2.00E-03	6.00	0.01	3.77E-03	11.32	0.02
Construction Equipment	Backhoe	15,862	34,898	76.94	0.44	0.98	2.15E-03	0.17	0.37	8.15E-04	3.02	6.64	0.01
	Excavator	73,888	162,561	358.38	0.07	0.16	3.60E-04	0.36	0.79	1.75E-03	0.82	1.81	3.99E-03
	Trencher	131,248	288,757	636.60	1.60	3.52	7.75E-03	0.64	1.41	3.11E-03	1.68	3.71	8.17E-03

Activity 3: Stringing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	187,000	412.26	0.03	28.20	0.06	8.40E-03	8.40	0.02	2.30E-03	2.30	5.08E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Excavator w/ Vacculift	130,035	286,087	630.71	0.34	0.75	1.65E-03	0.65	1.44	3.17E-03	0.82	1.81	3.99E-03
	RT Forklift	21,596	47,512	104.75	0.37	0.81	1.78E-03	0.10	0.22	4.81E-04	1.22	2.68	5.92E-03
	Generator	11,243	24,736	54.53	0.24	0.52	1.15E-03	0.08	0.17	3.70E-04	0.89	1.95	4.31E-03
	Skid Truck	77,373	170,227	375.29	0.05	0.12	2.56E-04	0.28	0.62	1.37E-03	6.73	14.81	0.03
	Water Truck	77,373	170,227	375.29	0.05	0.12	2.56E-04	0.28	0.62	1.37E-03	6.73	14.81	0.03

Activity 4: Welding and Lower In		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,009,800	2,226	0.03	152.28	0.34	8.40E-03	45.36	0.10	2.30E-03	12.44	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	1,783,145	3,931	0.46	3,800	8.38	2.00E-03	16.40	0.04	3.77E-03	30.95	0.07
Construction Equipment	Backhoe	15,862	34,898	76.94	0.44	0.98	2.15E-03	0.17	0.37	8.15E-04	3.02	6.64	0.01
	Blade	73,223	161,096	355.16	0.09	0.19	4.27E-04	0.31	0.67	1.48E-03	0.74	1.62	3.57E-03
	RT Crane	54,272	119,402	263.24	0.15	0.33	7.35E-04	0.28	0.62	1.37E-03	1.75	3.84	8.47E-03
	Dozer	74,585	164,093	361.76	0.09	0.21	4.55E-04	0.37	0.81	1.78E-03	1.89	4.16	0.01
	Excavator	73,888	162,561	358.38	0.07	0.16	3.60E-04	0.36	0.79	1.75E-03	0.82	1.81	3.99E-03
	RT Forklift	21,596	47,512	104.75	0.37	0.81	1.78E-03	0.10	0.22	4.81E-04	1.22	2.68	5.92E-03
	Generator	11,243	24,736	54.53	0.24	0.52	1.15E-03	0.08	0.17	3.70E-04	0.89	1.95	4.31E-03
	Sideboom	94,055	206,928	456.20	0.64	1.40	3.08E-03	0.47	1.02	2.26E-03	1.75	3.84	8.47E-03
	Skid Truck	77,373	170,227	375.29	0.05	0.12	2.56E-04	0.28	0.62	1.37E-03	6.73	14.81	0.03
	Tack Rig	74,585	164,093	361.76	0.09	0.21	4.55E-04	0.39	0.86	1.89E-03	1.89	4.16	0.01
	Water Truck	77,373	170,227	375.29	0.05	0.12	2.56E-04	0.28	0.62	1.37E-03	6.73	14.81	0.03
	Welding Machine	12,003	26,406	58.22	0.25	0.55	1.22E-03	0.05	0.12	2.59E-04	7.84	17.25	0.04
	Welding Truck	77,373	170,227	375.29	0.05	0.12	2.56E-04	0.46	1.01	2.22E-03	6.73	14.81	0.03

Denbury Snowy River CO2 Project Emissions
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Activity 5: X Ray										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	4,889	10.78	0.42	339.12	0.75
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Generator	10.00	4.0	0.33	0.06	0.73				10.10	7.33	0.02	17.23	12.51	0.03
	X-Ray Truck	100.00	4.0	0.33	0.06	0.73				2.80	2.04	4.49E-03	16.14	11.72	0.03

Activity 6: Testing										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	3,666	8.08	0.42	254.34	0.56
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04
Construction Equipment	Air Compressor/Dryer	400.00	2.0	0.10	0.02	0.22				37.95	8.35	0.02	140.25	30.86	0.07
	RT Forklift	65.00	2.0	0.10	0.02	0.22				12.90	2.84	6.25E-03	95.48	21.01	0.05
	Generator	50.00	2.0	0.10	0.02	0.22				5.34	1.17	2.59E-03	48.26	10.62	0.02

Activity 7: Backfill										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	5,500	12.12	0.42	381.51	0.84
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	260.00	2.0	1.00	0.18	2.20				4.95	10.89	0.02	20.71	45.56	0.10
	Dozer	240.00	2.0	1.00	0.18	2.20				5.30	11.66	0.03	21.66	47.64	0.11
	Excavator	236.00	2.0	1.00	0.18	2.20				4.15	9.12	0.02	18.73	41.21	0.09
	Generator	50.00	1.0	1.00	0.18	2.20				5.34	11.74	0.03	48.26	106.18	0.23
	Roller	145.00	2.0	1.00	0.18	2.20				10.67	23.48	0.05	25.19	55.42	0.12

Activity 8: Corrosion Protection										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						5	1	100	6.11	3,055	6.74	0.42	211.95	0.47
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Air Compressor	85.00	2.0	0.33	0.06	0.73				9.84	7.14	0.02	43.11	31.30	0.07
	Generator	10.00	1.0	0.33	0.06	0.73				10.10	7.33	0.02	17.23	12.51	0.03
	Paint Truck	185.00	2.0	0.33	0.06	0.73				2.80	2.04	4.49E-03	16.14	11.72	0.03

Activity 9: Reclaim										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	2	100	6.11	14,666	32.33	0.42	1,017	2.24
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	1	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Backhoe	110.00	4.0	2.00	0.37	4.40				27.40	120.56	0.27	41.31	181.75	0.40
	Blade	200.00	4.0	2.00	0.37	4.40				4.95	21.78	0.05	20.71	91.12	0.20
	Farm Tractor	190.00	4.0	2.00	0.37	4.40				2.80	12.34	0.03	16.14	71.02	0.16

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Activity 5: X Ray		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	134.34	0.30	0.14	110.02	0.24	0.05	38.40	0.08	0.29	233.12	0.51
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Generator	0.98	0.71	1.56E-03	0.95	0.69	1.51E-03	8.91E-03	6.47E-03	1.43E-05	3.45	2.50	5.52E-03
	X-Ray Truck	0.92	0.67	1.48E-03	0.89	0.65	1.43E-03	0.20	0.15	3.26E-04	1.37	1.00	2.20E-03

Activity 6: Testing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	100.76	0.22	0.14	82.52	0.18	0.05	28.80	0.06	0.29	174.84	0.39
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36
Construction Equipment	Air Compressor/Dryer	6.17	1.36	2.99E-03	5.99	1.32	2.91E-03	0.25	0.06	1.22E-04	8.14	1.79	3.95E-03
	RT Forklift	1.43	0.31	6.92E-04	1.38	0.30	6.71E-04	0.06	0.01	2.84E-05	2.57	0.57	1.25E-03
	Generator	0.40	0.09	1.95E-04	0.39	0.09	1.89E-04	0.03	6.52E-03	1.44E-05	1.77	0.39	8.58E-04

Activity 7: Backfill		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	151.14	0.33	0.14	123.78	0.27	0.05	43.20	0.10	0.29	262.26	0.58
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	2.87	6.32E-03	1.26	2.78	6.13E-03	0.19	0.43	9.40E-04	1.65	3.63	8.00E-03
	Dozer	1.38	3.03	6.68E-03	1.34	2.94	6.48E-03	0.20	0.43	9.58E-04	1.72	3.79	8.35E-03
	Excavator	1.16	2.55	5.62E-03	1.12	2.47	5.45E-03	0.20	0.43	9.47E-04	1.54	3.39	7.47E-03
	Generator	0.40	0.88	1.95E-03	0.39	0.86	1.89E-03	0.03	0.07	1.44E-04	1.77	3.89	8.58E-03
	Roller	2.72	5.98	0.01	2.64	5.80	0.01	0.11	0.25	5.47E-04	1.67	3.67	8.10E-03

Activity 8: Corrosion Protection		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	83.97	0.19	0.14	68.77	0.15	0.05	24.00	0.05	0.29	145.70	0.32
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Air Compressor	1.74	1.26	2.78E-03	1.69	1.22	2.70E-03	0.06	0.04	9.49E-05	1.14	0.83	1.83E-03
	Generator	0.98	0.71	1.56E-03	0.95	0.69	1.51E-03	8.91E-03	6.47E-03	1.43E-05	3.45	2.50	5.52E-03
	Paint Truck	0.92	0.67	1.48E-03	0.89	0.65	1.43E-03	0.20	0.15	3.26E-04	1.37	1.00	2.20E-03

Activity 9: Reclaim		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	403.03	0.89	0.14	330.07	0.73	0.05	115.20	0.25	0.29	699.36	1.54
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Backhoe	6.46	28.43	0.06	6.27	27.58	0.06	0.05	0.21	4.65E-04	6.65	29.27	0.06
	Blade	1.30	5.74	0.01	1.26	5.56	0.01	0.19	0.85	1.88E-03	1.65	7.26	0.02
	Farm Tractor	0.92	4.06	8.95E-03	0.89	3.94	8.68E-03	0.20	0.90	1.98E-03	1.37	6.04	0.01

Denbury Snowy River CO2 Project Emissions
Group 6 Flowline Construction

Activity 5: X Ray		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	149,600	329.81	0.03	22.56	0.05	8.40E-03	6.72	0.01	2.30E-03	1.84	4.06E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Generator	2,422	1,758	3.88	0.30	0.22	4.86E-04	0.02	0.01	2.44E-05	0.89	0.65	1.42E-03
	X-Ray Truck	77,373	56,175	123.84	0.05	0.04	8.45E-05	0.15	0.11	2.44E-04	6.73	4.89	0.01

Activity 6: Testing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	112,200	247.36	0.03	16.92	0.04	8.40E-03	5.04	0.01	2.30E-03	1.38	3.05E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	86,983	191.76	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Air Compressor/Dryer	88,895	19,558	43.12	0.62	0.14	3.01E-04	0.61	0.13	2.96E-04	0.89	0.20	4.31E-04
	RT Forklift	21,596	4,751	10.47	0.37	0.08	1.78E-04	0.10	0.02	4.81E-05	1.22	0.27	5.92E-04
	Generator	11,243	2,474	5.45	0.24	0.05	1.15E-04	0.08	0.02	3.70E-05	0.89	0.20	4.31E-04

Activity 7: Backfill		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	168,300	371.04	0.03	25.38	0.06	8.40E-03	7.56	0.02	2.30E-03	2.07	4.57E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	161,096	355.16	0.09	0.19	4.27E-04	0.40	0.87	1.93E-03	0.74	1.62	3.57E-03
	Dozer	74,585	164,093	361.76	0.09	0.21	4.55E-04	0.37	0.81	1.78E-03	1.89	4.16	0.01
	Excavator	73,888	162,561	358.38	0.07	0.16	3.60E-04	0.36	0.79	1.75E-03	0.82	1.81	3.99E-03
	Generator	11,243	24,736	54.53	0.24	0.52	1.15E-03	0.08	0.17	3.70E-04	0.89	1.95	4.31E-03
	Roller	41,867	92,111	203.07	0.13	0.29	6.47E-04	0.22	0.49	1.07E-03	1.19	2.62	5.77E-03

Activity 8: Corrosion Protection		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	93,500	206.13	0.03	14.10	0.03	8.40E-03	4.20	0.01	2.30E-03	1.15	2.54E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Air Compressor	21,856	15,868	34.98	0.10	0.07	1.53E-04	0.13	0.09	2.08E-04	0.89	0.65	1.42E-03
	Generator	2,422	1,758	3.88	0.30	0.22	4.86E-04	0.02	0.01	2.44E-05	0.89	0.65	1.42E-03
	Paint Truck	77,373	56,175	123.84	0.05	0.04	8.45E-05	0.28	0.21	4.52E-04	6.73	4.89	0.01

Activity 9: Reclaim		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	448,800	989.43	0.03	67.68	0.15	8.40E-03	20.16	0.04	2.30E-03	5.53	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Backhoe	15,862	69,796	153.87	0.44	1.95	4.30E-03	0.17	0.74	1.63E-03	3.02	13.28	0.03
	Blade	73,223	322,193	710.31	0.09	0.39	8.54E-04	0.31	1.34	2.96E-03	0.74	3.24	7.15E-03
	Farm Tractor	77,373	340,454	750.57	0.05	0.23	5.12E-04	0.29	1.28	2.81E-03	6.73	29.62	0.07

Denbury Snowy River CO2 Project Emissions
Group 6 Road Maintenance and Construction

New Roads

Miles 0.20

Activity 1: Road Clear										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	5,500	12.12	0.42	381.51	0.84
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor/Dryer				—	—									
	Blade	300.00	3.00	2.00	0.40	4.80				4.95	23.76	0.05	20.71	99.40	0.22
	Dozer	400.00	3.00	2.00	0.40	4.80				41.39	198.65	0.44	98.38	472.21	1.04
	Scraper	400.00	3.00	2.00	0.40	4.80				43.35	208.06	0.46	102.59	492.42	1.09

Activity 2: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	7,333	16.17	0.42	508.68	1.12
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	300.00	2.00	2.00	0.40	4.80									
	Dozer	400.00	3.00	2.00	0.40	4.80									
	Dump Truck	350.00	4.00	2.00	0.40	4.80									
	Scraper	400.00	3.00	2.00	0.40	4.80									

Two-Tracks Road Modifications

Miles —

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	—	—	0.42	—	—
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						12	2	100	1.65	—	—	4.58	—	—
Construction Equipment	Blade	300.00	2.00	2.00	—	—				4.95	—	—	20.71	—	—
	Dozer	400.00	3.00	2.00	—	—				41.39	—	—	98.38	—	—
	Dump Truck	350.00	4.00	2.00	—	—				7.76	—	—	33.63	—	—
	Scraper	400.00	3.00	2.00	—	—				43.35	—	—	102.59	—	—

Existing Roads

Miles —

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						2	1	100	6.11	—	—	0.42	—	—
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	—	—	4.58	—	—
Construction Equipment	Blade	300.00	2.00	2.00	—	—				4.95	—	—	20.71	—	—

Denbury Snowy River CO2 Project Emissions
Group 6 Road Maintenance and Construction

New Roads

Miles 0.20

Activity 1: Road Clear		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	151.14	0.33	0.14	123.78	0.27	0.05	43.20	0.10	0.29	262.26	0.58
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor/Dryer												
	Blade	1.30	6.26	0.01	1.26	6.07	0.01	0.19	0.93	2.05E-03	1.65	7.92	0.02
	Dozer	7.76	37.26	0.08	7.53	36.14	0.08	0.37	1.77	3.90E-03	7.10	34.07	0.08
	Scraper	8.06	38.67	0.09	7.81	37.51	0.08	0.37	1.76	3.88E-03	7.34	35.23	0.08

Activity 2: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	201.52	0.44	0.14	165.04	0.36	0.05	57.60	0.13	0.29	349.68	0.77
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade				1.26	6.07	0.01						
	Dozer				7.53	36.14	0.08						
	Dump Truck				2.01	9.67	0.02						
	Scraper				7.81	37.51	0.08						

Two-Tracks Road Modifications

Miles —

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	—	—	0.14	—	—	0.05	—	—	0.29	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	—	—	0.09	—	—	0.01	—	—	0.41	—	—
Construction Equipment	Blade	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—
	Dozer	7.76	—	—	7.53	—	—	0.37	—	—	7.10	—	—
	Dump Truck	2.08	—	—	2.01	—	—	0.35	—	—	2.72	—	—
	Scraper	8.06	—	—	7.81	—	—	0.37	—	—	7.34	—	—

Existing Roads

Miles —

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	—	—	0.14	—	—	0.05	—	—	0.29	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	—	—	0.09	—	—	0.01	—	—	0.41	—	—
Construction Equipment	Blade	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—

Denbury Snowy River CO2 Project Emissions
Group 6 Road Maintenance and Construction

New Roads

Miles 0.20

Activity 1: Road Clear		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	168,300	371.04	0.03	25.38	0.06	8.40E-03	7.56	0.02	2.30E-03	2.07	4.57E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	6.79	0.01
Construction Equipment	Air Compressor/Dryer												
	Blade	73,223	351,470	774.86	0.09	0.42	9.32E-04	0.46	2.20	4.85E-03	0.74	3.54	7.80E-03
	Dozer	134,685	646,489	1,425	0.51	2.44	5.39E-03	0.61	2.93	6.46E-03	1.89	9.07	0.02
	Scraper	133,797	642,227	1,416	0.53	2.55	5.62E-03	0.61	2.93	6.46E-03	3.04	14.60	0.03

Activity 2: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	224,400	494.72	0.03	33.84	0.07	8.40E-03	10.08	0.02	2.30E-03	2.77	6.10E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade							0.46	2.20	4.85E-03	0.74	3.54	7.80E-03
	Dozer							0.61	2.93	6.46E-03	1.89	9.07	0.02
	Dump Truck							0.53	2.56	5.65E-03	6.73	32.31	0.07
	Scraper							0.61	2.93	6.46E-03	3.04	14.60	0.03

Two-Tracks Road Modifications

Miles —

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	—	—	0.03	—	—	8.40E-03	—	—	2.30E-03	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	—	—	0.46	—	—	2.00E-03	—	—	3.77E-03	—	—
Construction Equipment	Blade	73,223	—	—	0.09	—	—	0.46	—	—	0.74	—	—
	Dozer	134,685	—	—	0.51	—	—	0.61	—	—	1.89	—	—
	Dump Truck	132,987	—	—	0.13	—	—	0.53	—	—	6.73	—	—
	Scraper	133,797	—	—	0.53	—	—	0.61	—	—	3.04	—	—

Existing Roads

Miles —

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/hr)	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	—	—	0.03	—	—	8.40E-03	—	—	2.30E-03	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	—	—	0.46	—	—	2.00E-03	—	—	3.77E-03	—	—
Construction Equipment	Blade	73,223	—	—	0.09	—	—	0.46	—	—	0.74	—	—

Denbury Snowy River CO2 Project Emissions
Group 6 Fugitive Dust Emissions from Paved Roads

Summary of Fugitive Emissions

Paved Roads emission factor from AP-42, Section 13.2.1: *Paved Roads* (01/11)

$$E = k(sL)^{0.91}(W)^{1.02}(1-P/(4*365))$$

where:

sL =	0.6	road surface silt loading silt loading (g/m2) [Table 13.2.1-2, for Ubiquitous Baseline, <500]
W_{LDT} =	4	tons [Average vehicle weight]
$W_{Tractor}$ =	25	tons [Average vehicle weight]
k =	0.0022	lb/VMT [Table 13.2.1-1, for PM_{10}]
k =	0.00054	lb/VMT [Table 13.2.1-1, for $PM_{2.5}$]
P =	100	days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.1-2]

1/2 Ton Trucks (light-duty trucks)

$E_{(PM10)}$ =	5.29E-03	lb/VMT
$E_{(PM2.5)}$ =	1.30E-03	lb/VMT
	126	Duration of Construction (days)-Well Pad Construction
	2	Duration of Construction (days)-Flow/Bulk Line Construction
	0	Duration of Construction (days)-Pump Station Construction
	0	Duration of Construction (days)-Road Construction (existing and two-track roads)

Tractor Trailers

$E_{(PM10)}$ =	3.43E-02	lb/VMT
$E_{(PM2.5)}$ =	8.43E-03	lb/VMT
	2	Equipment Delivery (days) -Well Pad Construction
	2	Equipment Delivery (days) -Flow/Bulk Line Construction
	0	Equipment Delivery (days) -Pump Station Construction
	0	Equipment Delivery (days) -Road Construction (existing and two-track roads)

Project Segment

Equipment Type	Average Vehicle Weight (tons)[a]	Well Pad Construction			Flow/Bulk Line Construction			Pump Station Construction			Road Construction		
		VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]
Light Duty Trucks	4	100	22	277288	100	135	21682	100	0	0	100	0	0
Tractor Trailers	25	100	21	4200	100	106	21200	100	0	0	100	0	0
Total VMT				281488			42882			0			0
a - Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.													
PM10 (tons)				**0.81**			**0.42**			**0.00**			**0.00**
PM2.5 (tons)				**0.20**			**0.10**			**0.00**			**0.00**

Project Totals

Total Paved Road Emissions	
Pollutant	**tons**
PM_{10}	**1.23**
$PM_{2.5}$	**0.30**

[a] *Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.*

[b] VMT per day are projected based on experience from previous construction projects.

[c] Vehicle Miles Traveled (VMT) are based on the vehicle quantity , project duration, and experience from previous construction projects.

Denbury Snowy River CO2 Project Emissions
Group 6 Fugitive Dust Emissions from Unpaved Roads

Summary of Fugitive Emissions

Unpaved Roads emission factor from AP-42, Section 13.2.2: *Unpaved Roads* (11/06); Equations a1 and 2

$$E = k\,(s/12)^a (W/3)^b \qquad (1a)$$

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight

Table 13.2.2-2 - Constants for Equation 1a

Constant	PM2.5	PM10
k (lb/VMT)	0.15	1.5
a	0.9	0.9
b	0.45	0.45

Surface Silt (s) content based on Table 13.2.2-1 - construction sites

s = 8.50

$$E_{ext} = E\,[(365 - P)/365] \qquad (2)$$

E_{ext} = annual size-specific emisison factor extrapolated for natural mitigation, lb/VMT
E = emisison factor from Equation 1a
P = days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.2-1

P = 100

Equipment	Construction Duration (days)	Miles per Day	Quantity	Total Vehicle Miles Traveled[a] (VMT)	W: Mean Vehicle Weight (tons)[b]	Emission Factors (lb/VMT)[c]		Emissions (tons)		Controlled Emissions (tons)	
						PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Well Pad Construction											
1/2 Ton Trucks	2.8	100	0	4,280	12.02941176	1.492	0.149	3.192	0.319	1.6	0.2
							Total (tons)	**3.192**	**0.319**	**1.6**	**0.2**

(a) VMT per day are projected based on experience from previous construction projects
(b) Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.
(c) AP 42 Section 13.2.2 Unpaved Roads, dated November 2006, Equations 1a and 2

Denbury Snowy River CO2 Project Emissions
Group 6 Fugitive Dust Emissions from Earthmoving Activities

Construction Activity	Activity Type	Approximate Pipeline Length or Road Length (mi)	Excavation Volume[a] (ft^3)	Temporary Workspace for Construction (acres)[b]
Flowline Injection Well 09	Pipeline	0.09	8,880	0.07
Flowline Injection Well 14	Pipeline	0.09	8,544	0.07
New Road Injection Well 09	Access Roads	0.1	15,840	0.36
New Road Injection Well 14	Access Roads	0.1	15,840	0.36
Injection Well 09 Construction Pad	Well Pad Construction	--	601,128	4.6
Injection Well 14 Construction Pad	Well Pad Construction	--	601,128	4.6

Project Construction Activity Particulate Matter Emissions

Construction Activity	Excavation[a] (tons)	Excavation PM_{10} Emission Factor[c] (lb/ton)	Pipeline Excavation PM_{10} Emissions (tons)	Backfilling[a] (tons)	Backfilling PM_{10} Emission Factor[b] (lb/ton)	Backfilling PM10 Emissions (tpy)	Windblown Dust Area (acre)	PM_{10} Windblown Dust Emission Factor[d,e] (tons/acre)	Windblown Dust PM_{10} Emissions - Uncontrolled (tons)	Total Construction Activity PM_{10} emissions (tons)	Total Controlled Construction Activity PM_{10} emissions[g] (tons)	Total Construction Activity $PM_{2.5}$ emissions[f] (tons)	Total Controlled Construction Activity $PM_{2.5}$ emissions[g] (tons)
Flowline Injection Well 09	444	0.058	0.013	444	0.012	0.003	0.1	3.80E-01	0.03	0.041	0.021	0.009	0.004
Flowline Injection Well 14	427	0.058	0.012	427	0.012	0.003	0.1	3.80E-01	0.02	0.040	0.020	0.008	0.004
New Road Injection Well 09	792	0.058	0.023	792	0.012	0.005	0.4	3.80E-01	0.14	0.166	0.083	0.035	0.017
New Road Injection Well 14	792	0.058	0.023	792	0.012	0.005	0.4	3.80E-01	0.14	0.166	0.083	0.035	0.017
Injection Well 09 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
Injection Well 14 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E 01	1.75	2.800	1.400	0.582	0.291
									Total	**6.013**	**3.006**	**1.251**	**0.625**

(a) Excavation of well pad sites assumed to be 3 feet deep. Excavation and backfilling assumes pipeline will be 6 ft x 3 ft x approximate length (ft) for the Project component. Excavation for road construction assumes road excavation is 30 ft width x 1 ft deep x approximate road length (ft). Soil density is assumed to be 100 lb/ft^3

(b) Temporary workspace acres for roadways assumed to be 30 ft width x approximate road length (mi).

(c) Excavation and backfilling factors from AP-42, Table 11.9-4 (dated 7/98), assuming 100% of TSP is PM_{10}

(d) Windblown dust factor from AP-42 Table 11.9-4 Uncontrolled Particulate Emission Factors for Open Dust Sources

(e) PM_{10} emissions are conservatively assumed to be 100% of TSP.

(f) $PM_{2.5}$ emissions were calculated following the SCAQMD Particulate Matter $PM_{2.5}$ Significance Thresholds and Calculation Methodology (2006). For construction and demolition fugitive dust sources, 20.8% of the PM_{10} would be $PM_{2.5}$

(g) Controls are conservatively assumed to have a 50% reduction factor based on Emission Factors for Paved and Unpaved Roads (1/2015) Utah DEQ

Note: Pipeyards/wareyards are assumed to have negligible particulate emissions because of no construction activities.

Denbury Snowy River CO2 Project Emissions
Construction Group 7 Emissions Summary

Uncontrolled Emissions Summary (U.S. Tons Total)

Category	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-year GWP CO_2e	100- year GWP CO_2e	HAPS
Well Construction	0.67	0.42	0.03	0.03	5.06E-03	0.05	299.58	6.28E-03	5.11E-03	301.49	301.16	0.05
Flow/Bulk Line Construction	0.21	0.15	0.01	7.77E-03	1.77E-03	0.02	60.20	0.01	5.13E-04	61.31	60.69	0.02
Road Construction	0.05	0.04	2.85E-03	2.32E-03	4.19E-04	4.93E-03	28.34	2.78E-03	1.81E-04	28.62	28.47	4.93E-03
Paved Roads			1.73	0.43								
Unpaved Roads			**6.45**	**0.64**								
Earthmoving			6.83	3.41								
Total	0.94	0.61	**15.06**	4.52	7.25E-03	0.07	388.12	0.02	5.81E-03	391.42	390.32	0.07

Controlled Emissions Summary (U.S. Tons Total)

Category	PM_{10}	$PM_{2.5}$
Well Construction	0.03	0.03
Flow/Bulk Line Construction	0.01	7.77E-03
Road Construction	2.85E-03	2.32E-03
Paved Roads	1.73	0.43
Unpaved Roads	3.22	0.32
Earthmoving	3.41	0.71
Controlled Total	8.42	1.50

Denbury Snowy River CO2 Project Emissions
Group 7 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						3	1	100	6.11	3,373	7.44	0.42	233.99	0.52
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						3	2	100	1.65	990.66	2.18	4.58	2,749	6.06
Construction Equipment	Backhoe					0.E+00									
	Dozer	153.00	2.00	0.20	1.84	22.08				6.06	133.89	0.30	19.27	425.53	0.94
	Excavator	160.00	1.00	0.20	1.84	22.08				5.28	116.67	0.26	17.08	377.21	0.83

Activity 2: Drill Pad Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	33,732	74.37	0.42	2,340	5.16
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						5	2	100	1.65	1,651	3.64	4.58	4,582	10.10
Construction Equipment	Blade	140.00	1.00	0.25	2.30	27.60				6.09	167.98	0.37	19.47	537.36	1.18
	Dozer	153.00	1.00	1.00	9.20	110.40				6.06	669.43	1.48	19.27	2,128	4.69
	Roller Compactor	156.00	1.00	0.25	2.30	27.60				10.67	294.50	0.65	25.19	695.26	1.53
	Scraper	400.00	3.00	1.00	9.20	110.40				43.35	4,785	10.55	102.59	11,326	24.97

Activity 3: Drill Pad Drilling

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						4	1	100	6.11	146,659	323.33	0.42	10,174	22.43
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment (Drill Rig)	Generator	3,000	4.00	60.00	60.00	720.00				88.22	63,515	140.03	234.63	168,931	372.43

Activity 4: Drill Pad Construction

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO			NO_x		
										EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	302,485	666.86	0.42	20,983	46.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5.34	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22.17	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7.29	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26.24	12,594	27.77	65.08	31,241	68.87
	Generator	25.00	3.00	55.00	55.00	660.00				14.43	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				25.84	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 7 Wellpad Construction

Total Disturbed Acres **9.20**

Copy over pump s

Activity 1: Drill Pad Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	92.70	0.20	0.14	75.92	0.17	0.05	26.50	0.06	0.29	160.85	0.35
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	86.86	0.19	0.09	51.50	0.11	0.01	8.94	0.02	0.41	243.06	0.54
Construction Equipment	Backhoe												
	Dozer	1.45	31.98	0.07	1.40	31.02	0.07	0.11	2.52	6.E-03	0.96	21.23	0.05
	Excavator	1.24	27.28	0.06	1.20	26.46	0.06	0.12	2.54	6.E-03	0.85	18.80	0.04

Activity 2: Drill Pad Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	926.97	2.04	0.14	759.17	1.67	0.05	264.96	0.58	0.29	1,609	3.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	144.77	0.32	0.09	85.84	0.19	0.01	14.90	0.03	0.41	405.10	0.89
Construction Equipment	Blade	1.45	39.96	0.09	1.40	38.76	0.09	0.12	3.26	7.E-03	0.97	26.71	0.06
	Dozer	1.45	159.90	0.35	1.40	155.10	0.34	0.11	12.62	0.03	0.96	106.15	0.23
	Roller Compactor	2.72	75.06	0.17	2.64	72.81	0.16	0.11	3.11	7.E-03	1.67	46.07	0.10
	Scraper	8.06	889.39	1.96	7.81	862.70	1.90	0.37	40.52	0.09	7.34	810.38	1.79

Activity 3: Drill Pad Drilling		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	4,030	8.89	0.14	3,301	7.28	0.05	1,152	2.54	0.29	6,994	15.42
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment (Drill Rig)	Generator	10.64	7,661	16.89	10.32	7,431	16.38	0.42	302.18	0.67	13.21	9,510	20.97

Activity 4: Drill Pad Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	8,313	18.33	0.14	6,808	15.01	0.05	2,376	5.24	0.29	14,424	31.80
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66	1,754	3.87	0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 7 Wellpad Construction

Total Disturbed Acres **9.20** tation construction

Activity 1: Drill Pad Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	103,224	227.57	0.03	15.57	0.03	8.E-03	4.64	0.01	2.E-03	1.27	3.E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	130,474	287.65	0.46	278.04	0.61	2.E-03	1.20	3.E-03	4.E-03	2.26	5.E-03
Construction Equipment	Backhoe							0.E+00	0.E+00	0.E+00	0.E+00	0.E+00	0.E+00
	Dozer	43,104	951,739	2,098	0.07	1.65	4.E-03	0.23	5.16	0.01	1.89	41.74	0.09
	Excavator	43,580	962,237	2,121	0.06	1.41	3.E-03	0.24	5.39	0.01	0.82	18.15	0.04

Activity 2: Drill Pad Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,032,240	2,276	0.03	155.66	0.34	8.E-03	46.37	0.10	2.E-03	12.72	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	217,457	479.41	0.46	463.40	1.02	2.E-03	2.00	4.E-03	4.E-03	3.77	8.E-03
Construction Equipment	Blade	44,593	1,230,761	2,713	0.07	2.06	5.E-03	0.21	5.90	0.01	0.74	20.33	0.04
	Dozer	43,104	4,758,694	10,491	0.07	8.25	0.02	0.23	25.79	0.06	1.89	208.68	0.46
	Roller Compactor	41,867	1,155,529	2,548	0.13	3.68	8.E-03	0.24	6.57	0.01	1.19	32.82	0.07
	Scraper	133,797	14,771,217	32,565	0.53	58.58	0.13	0.61	67.42	0.15	3.04	335.88	0.74

Activity 3: Drill Pad Drilling		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	4,488,000	9,894	0.03	676.80	1.49	8.E-03	201.60	0.44	2.E-03	55.30	0.12
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.E-03	1.60	4.E-03	4.E-03	1.25	3.E-03
Construction Equipment (Drill Rig)	Generator	148,388	106,839,491	235,541	1.00	722.78	1.59	4.58	3,298	7.27	0.89	639.77	1.41

Activity 4: Drill Pad Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	9,256,500	20,407	0.03	1,396	3.08	8.E-03	415.80	0.92	2.E-03	114.06	0.25
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.E-03	3.60	8.E-03	4.E-03	1.25	3.E-03
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89	586.46	1.29
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 7 Flowline Construction

Total Miles 1.57

Activity 1: Clearing ROW

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						16	1	100	6.11	30,756	67.81	0.42	2,134	4.70
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						16	2	100	1.65	5,284	11.65	4.58	14,662	32.32
Construction Equipment	Backhoe				0.00E+00	0.00E+00									
	Blade	260.00	2.0	2.00	3.15	37.75				4.95	186.85	0.41	20.71	781.69	1.72
	Dozer	240.00	8.0	2.00	3.15	37.75				5.30	200.04	0.44	21.66	817.44	1.80
	Water Truck	185.00	6.0	2.00	3.15	37.75				2.80	105.87	0.23	16.14	609.28	1.34

Activity 2: Trenching

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						15	1	100	6.11	14,417	31.78	0.42	1,000	2.20
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						15	2	100	1.65	4,953	10.92	4.58	13,746	30.30
Construction Equipment	Backhoe	110.00	1.0	1.00	1.57	18.87				27.40	517.13	1.14	41.31	779.59	1.72
	Excavator	236.00	11.0	1.00	1.57	18.87				4.15	78.24	0.17	18.73	353.55	0.78
	Trencher	420.00	3.0	1.00	1.57	18.87				167.78	3,167	6.98	342.02	6,455	14.23

Activity 3: Stringing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						10	1	100	6.11	9,611	21.19	0.42	666.72	1.47
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Excavator w/ Vacculift	428.00	2.0	1.00	1.57	18.87				26.24	495.22	1.09	65.08	1,228	2.71
	RT Forklift	65.00	2.0	1.00	1.57	18.87				12.90	243.39	0.54	95.48	1,802	3.97
	Generator	50.00	2.0	1.00	1.57	18.87				5.34	100.74	0.22	48.26	910.88	2.01
	Skid Truck	185.00	2.0	1.00	1.57	18.87				2.80	52.93	0.12	16.14	304.64	0.67
	Water Truck	185.00	2.0	1.00	1.57	18.87				2.80	52.93	0.12	16.14	304.64	0.67

Activity 4: Welding and Lower In

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						54	1	100	6.11	51,901	114.42	0.42	3,600	7.94
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						41	2	100	1.65	13,539	29.85	4.58	37,572	82.83
Construction Equipment	Backhoe	110.00	2.0	1.00	1.57	18.87				27.40	517.13	1.14	41.31	779.59	1.72
	Blade	200.00	2.0	1.00	1.57	18.87				4.95	93.42	0.21	20.71	390.85	0.86
	RT Crane	185.00	2.0	1.00	1.57	18.87				7.29	137.61	0.30	27.67	522.18	1.15
	Dozer	240.00	2.0	1.00	1.57	18.87				5.30	100.02	0.22	21.66	408.72	0.90
	Excavator	236.00	2.0	1.00	1.57	18.87				4.15	78.24	0.17	18.73	353.55	0.78
	RT Forklift	65.00	2.0	1.00	1.57	18.87				12.90	243.39	0.54	95.48	1,802	3.97
	Generator	50.00	2.0	1.00	1.57	18.87				5.34	100.74	0.22	48.26	910.88	2.01
	Sideboom	305.00	10.0	1.00	1.57	18.87				38.89	733.96	1.62	129.26	2,440	5.38
	Skid Truck	185.00	2.0	1.00	1.57	18.87				2.80	52.93	0.12	16.14	304.64	0.67
	Tack Rig	255.00	2.0	1.00	1.57	18.87				5.30	100.02	0.22	21.66	408.72	0.90
	Water Truck	185.00	2.0	1.00	1.57	18.87				2.80	52.93	0.12	16.14	304.64	0.67
	Welding Machine	35.00	14.0	1.00	1.57	18.87				5.79	109.29	0.24	51.09	964.20	2.13
	Welding Truck	300.00	10.0	1.00	1.57	18.87				2.80	52.93	0.12	16.14	304.64	0.67

Denbury Snowy River CO2 Project Emissions
Group 7 Flowline Construction

Total Miles 1.57

Activity 1: Clearing ROW		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	845.20	1.86	0.14	692.19	1.53	0.05	241.59	0.53	0.29	1,467	3.23
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	463.26	1.02	0.09	274.69	0.61	0.01	47.68	0.11	0.41	1,296	2.86
Construction Equipment	Backhoe												
	Blade	1.30	49.20	0.11	1.26	47.72	0.11	0.19	7.31	0.02	1.65	62.28	0.14
	Dozer	1.38	52.02	0.11	1.34	50.46	0.11	0.20	7.45	0.02	1.72	64.96	0.14
	Water Truck	0.92	34.83	0.08	0.89	33.78	0.07	0.20	7.69	0.02	1.37	51.84	0.11

Activity 2: Trenching		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	396.19	0.87	0.14	324.47	0.72	0.05	113.24	0.25	0.29	687.48	1.52
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	434.31	0.96	0.09	257.52	0.57	0.01	44.70	0.10	0.41	1,215	2.68
Construction Equipment	Backhoe	6.46	121.95	0.27	6.27	118.29	0.26	0.05	0.90	1.99E-03	6.65	125.54	0.28
	Excavator	1.16	21.86	0.05	1.12	21.21	0.05	0.20	3.68	8.12E-03	1.54	29.06	0.06
	Trencher	27.66	521.99	1.15	26.83	506.33	1.12	0.40	7.56	0.02	23.86	450.24	0.99

Activity 3: Stringing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	264.12	0.58	0.14	216.31	0.48	0.05	75.50	0.17	0.29	458.32	1.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Excavator w/ Vacculift	5.40	101.91	0.22	5.24	98.86	0.22	0.35	6.62	0.01	5.07	95.64	0.21
	RT Forklift	1.43	26.93	0.06	1.38	26.13	0.06	0.06	1.10	2.43E-03	2.57	48.53	0.11
	Generator	0.40	7.57	0.02	0.39	7.34	0.02	0.03	0.56	1.23E-03	1.77	33.37	0.07
	Skid Truck	0.92	17.41	0.04	0.89	16.89	0.04	0.20	3.85	8.48E-03	1.37	25.92	0.06
	Water Truck	0.92	17.41	0.04	0.89	16.89	0.04	0.20	3.85	8.48E-03	1.37	25.92	0.06

Activity 4: Welding and Lower In		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,426	3.14	0.14	1,168	2.58	0.05	407.68	0.90	0.29	2,475	5.46
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	1,187	2.62	0.09	703.89	1.55	0.01	122.18	0.27	0.41	3,322	7.32
Construction Equipment	Backhoe	6.46	121.95	0.27	6.27	118.29	0.26	0.05	0.90	1.99E-03	6.65	125.54	0.28
	Blade	1.30	24.60	0.05	1.26	23.86	0.05	0.19	3.66	8.06E-03	1.65	31.14	0.07
	RT Crane	1.70	32.08	0.07	1.65	31.11	0.07	0.15	2.76	6.09E-03	2.29	43.18	0.10
	Dozer	1.38	26.01	0.06	1.34	25.23	0.06	0.20	3.73	8.22E-03	1.72	32.48	0.07
	Excavator	1.16	21.86	0.05	1.12	21.21	0.05	0.20	3.68	8.12E-03	1.54	29.06	0.06
	RT Forklift	1.43	26.93	0.06	1.38	26.13	0.06	0.06	1.10	2.43E-03	2.57	48.53	0.11
	Generator	0.40	7.57	0.02	0.39	7.34	0.02	0.03	0.56	1.23E-03	1.77	33.37	0.07
	Sideboom	6.83	128.85	0.28	6.62	124.99	0.28	0.27	5.05	0.01	8.67	163.60	0.36
	Skid Truck	0.92	17.41	0.04	0.89	16.89	0.04	0.20	3.85	8.48E-03	1.37	25.92	0.06
	Tack Rig	1.38	26.01	0.06	1.34	25.23	0.06	0.20	3.73	8.22E-03	1.72	32.48	0.07
	Water Truck	0.92	17.41	0.04	0.89	16.89	0.04	0.20	3.85	8.48E-03	1.37	25.92	0.06
	Welding Machine	0.45	8.57	0.02	0.44	8.31	0.02	0.03	0.60	1.32E-03	1.88	35.46	0.08
	Welding Truck	0.92	17.41	0.04	0.89	16.89	0.04	0.20	3.85	8.48E-03	1.37	25.92	0.06

Denbury Snowy River CO2 Project Emissions
Group 7 Flowline Construction

Total Miles 1.57

Activity 1: Clearing ROW		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	941,177	2,075	0.03	141.93	0.31	8.40E-03	42.28	0.09	2.30E-03	11.60	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	695,862	1,534	0.46	1,483	3.27	2.00E-03	6.40	0.01	3.77E-03	12.08	0.03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	73,223	2,764,003	6,094	0.09	3.32	7.33E-03	0.40	14.98	0.03	0.74	27.81	0.06
	Dozer	74,585	2,815,408	6,207	0.09	3.54	7.80E-03	0.37	13.83	0.03	1.89	71.35	0.16
	Water Truck	77,373	2,920,659	6,439	0.05	1.99	4.39E-03	0.28	10.66	0.02	6.73	254.06	0.56

Activity 2: Trenching		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	441,177	972.63	0.03	66.53	0.15	8.40E-03	19.82	0.04	2.30E-03	5.44	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	652,370	1,438	0.46	1,390	3.06	2.00E-03	6.00	0.01	3.77E-03	11.32	0.02
Construction Equipment	Backhoe	15,862	299,379	660.02	0.44	8.37	0.02	0.17	3.17	6.99E-03	3.02	56.94	0.13
	Excavator	73,888	1,394,562	3,074	0.07	1.40	3.09E-03	0.36	6.80	0.01	0.82	15.51	0.03
	Trencher	131,248	2,477,164	5,461	1.60	30.17	0.07	0.64	12.10	0.03	1.68	31.78	0.07

Activity 3: Stringing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	294,118	648.42	0.03	44.35	0.10	8.40E-03	13.21	0.03	2.30E-03	3.62	7.99E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Excavator w/ Vacculift	130,035	2,454,262	5,411	0.34	6.40	0.01	0.65	12.33	0.03	0.82	15.51	0.03
	RT Forklift	21,596	407,593	898.59	0.37	6.93	0.02	0.10	1.87	4.13E-03	1.22	23.02	0.05
	Generator	11,243	212,202	467.83	0.24	4.46	0.01	0.08	1.44	3.18E-03	0.89	16.77	0.04
	Skid Truck	77,373	1,460,329	3,219	0.05	1.00	2.20E-03	0.28	5.33	0.01	6.73	127.03	0.28
	Water Truck	77,373	1,460,329	3,219	0.05	1.00	2.20E-03	0.28	5.33	0.01	6.73	127.03	0.28

Activity 4: Welding and Lower In		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,588,237	3,501	0.03	239.51	0.53	8.40E-03	71.34	0.16	2.30E-03	19.57	0.04
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	1,783,145	3,931	0.46	3,800	8.38	2.00E-03	16.40	0.04	3.77E-03	30.95	0.07
Construction Equipment	Backhoe	15,862	299,379	660.02	0.44	8.37	0.02	0.17	3.17	6.99E-03	3.02	56.94	0.13
	Blade	73,223	1,382,002	3,047	0.09	1.66	3.66E-03	0.31	5.76	0.01	0.74	13.91	0.03
	RT Crane	54,272	1,024,319	2,258	0.15	2.86	6.31E-03	0.28	5.33	0.01	1.75	32.96	0.07
	Dozer	74,585	1,407,704	3,103	0.09	1.77	3.90E-03	0.37	6.92	0.02	1.89	35.68	0.08
	Excavator	73,888	1,394,562	3,074	0.07	1.40	3.09E-03	0.36	6.80	0.01	0.82	15.51	0.03
	RT Forklift	21,596	407,593	898.59	0.37	6.93	0.02	0.10	1.87	4.13E-03	1.22	23.02	0.05
	Generator	11,243	212,202	467.83	0.24	4.46	0.01	0.08	1.44	3.18E-03	0.89	16.77	0.04
	Sideboom	94,055	1,775,179	3,914	0.64	12.00	0.03	0.47	8.79	0.02	1.75	32.96	0.07
	Skid Truck	77,373	1,460,329	3,219	0.05	1.00	2.20E-03	0.28	5.33	0.01	6.73	127.03	0.28
	Tack Rig	74,585	1,407,704	3,103	0.09	1.77	3.90E-03	0.39	7.35	0.02	1.89	35.68	0.08
	Water Truck	77,373	1,460,329	3,219	0.05	1.00	2.20E-03	0.28	5.33	0.01	6.73	127.03	0.28
	Welding Machine	12,003	226,534	499.42	0.25	4.73	0.01	0.05	1.01	2.22E-03	7.84	148.00	0.33
	Welding Truck	77,373	1,460,329	3,219	0.05	1.00	2.20E-03	0.46	8.64	0.02	6.73	127.03	0.28

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Activity 5: X Ray										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	4,889	10.78	0.42	339.12	0.75
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Generator	10.00	4.0	0.33	0.52	6.23				10.10	62.92	0.14	17.23	107.32	0.24
	X-Ray Truck	100.00	4.0	0.33	0.52	6.23				2.80	17.47	0.04	16.14	100.53	0.22

Activity 6: Testing										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	3,666	8.08	0.42	254.34	0.56
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04
Construction Equipment	Air Compressor/Dryer	400.00	2.0	0.10	0.16	1.89				37.95	71.62	0.16	140.25	264.71	0.58
	RT Forklift	65.00	2.0	0.10	0.16	1.89				12.90	24.34	0.05	95.48	180.22	0.40
	Generator	50.00	2.0	0.10	0.16	1.89				5.34	10.07	0.02	48.26	91.09	0.20

Activity 7: Backfill										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	8,650	19.07	0.42	600.05	1.32
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	260.00	2.0	1.00	1.57	18.87				4.95	93.42	0.21	20.71	390.85	0.86
	Dozer	240.00	2.0	1.00	1.57	18.87				5.30	100.02	0.22	21.66	408.72	0.90
	Excavator	236.00	2.0	1.00	1.57	18.87				4.15	78.24	0.17	18.73	353.55	0.78
	Generator	50.00	1.0	1.00	1.57	18.87				5.34	100.74	0.22	48.26	910.88	2.01
	Roller	145.00	2.0	1.00	1.57	18.87				10.67	201.39	0.44	25.19	475.45	1.05

Activity 8: Corrosion Protection										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						5	1	100	6.11	3,055	6.74	0.42	211.95	0.47
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Air Compressor	85.00	2.0	0.33	0.52	6.23				9.84	61.29	0.14	43.11	268.48	0.59
	Generator	10.00	1.0	0.33	0.52	6.23				10.10	62.92	0.14	17.23	107.32	0.24
	Paint Truck	185.00	2.0	0.33	0.52	6.23				2.80	17.47	0.04	16.14	100.53	0.22

Activity 9: Reclaim										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	23,067	50.85	0.42	1,600	3.53
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Backhoe	110.00	4.0	2.00	3.15	37.75				27.40	1,034	2.28	41.31	1,559	3.44
	Blade	200.00	4.0	2.00	3.15	37.75				4.95	186.85	0.41	20.71	781.69	1.72
	Farm Tractor	190.00	4.0	2.00	3.15	37.75				2.80	105.87	0.23	16.14	609.28	1.34

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Activity 5: X Ray		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	134.34	0.30	0.14	110.02	0.24	0.05	38.40	0.08	0.29	233.12	0.51
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Generator	0.98	6.08	0.01	0.95	5.89	0.01	8.91E-03	0.06	1.22E-04	3.45	21.48	0.05
	X-Ray Truck	0.92	5.75	0.01	0.89	5.57	0.01	0.20	1.27	2.80E-03	1.37	8.55	0.02

Activity 6: Testing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	100.76	0.22	0.14	82.52	0.18	0.05	28.80	0.06	0.29	174.84	0.39
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36
Construction Equipment	Air Compressor/Dryer	6.17	11.65	0.03	5.99	11.30	0.02	0.25	0.47	1.05E-03	8.14	15.36	0.03
	RT Forklift	1.43	2.69	5.94E-03	1.38	2.61	5.76E-03	0.06	0.11	2.43E-04	2.57	4.85	0.01
	Generator	0.40	0.76	1.67E-03	0.39	0.73	1.62E-03	0.03	0.06	1.23E-04	1.77	3.34	7.36E-03

Activity 7: Backfill		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	237.71	0.52	0.14	194.68	0.43	0.05	67.95	0.15	0.29	412.49	0.91
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	24.60	0.05	1.26	23.86	0.05	0.19	3.66	8.06E-03	1.65	31.14	0.07
	Dozer	1.38	26.01	0.06	1.34	25.23	0.06	0.20	3.73	8.22E-03	1.72	32.48	0.07
	Excavator	1.16	21.86	0.05	1.12	21.21	0.05	0.20	3.68	8.12E-03	1.54	29.06	0.06
	Generator	0.40	7.57	0.02	0.39	7.34	0.02	0.03	0.56	1.23E-03	1.77	33.37	0.07
	Roller	2.72	51.33	0.11	2.64	49.79	0.11	0.11	2.13	4.69E-03	1.67	31.51	0.07

Activity 8: Corrosion Protection		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	83.97	0.19	0.14	68.77	0.15	0.05	24.00	0.05	0.29	145.70	0.32
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Air Compressor	1.74	10.83	0.02	1.69	10.51	0.02	0.06	0.37	8.14E-04	1.14	7.11	0.02
	Generator	0.98	6.08	0.01	0.95	5.89	0.01	8.91E-03	0.06	1.22E-04	3.45	21.48	0.05
	Paint Truck	0.92	5.75	0.01	0.89	5.57	0.01	0.20	1.27	2.80E-03	1.37	8.55	0.02

Activity 9: Reclaim		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	633.90	1.40	0.14	519.14	1.14	0.05	181.19	0.40	0.29	1,100	2.43
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Backhoe	6.46	243.90	0.54	6.27	236.59	0.52	0.05	1.81	3.99E-03	6.65	251.09	0.55
	Blade	1.30	49.20	0.11	1.26	47.72	0.11	0.19	7.31	0.02	1.65	62.28	0.14
	Farm Tractor	0.92	34.83	0.08	0.89	33.78	0.07	0.20	7.69	0.02	1.37	51.84	0.11

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Activity 5: X Ray		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	149,600	329.81	0.03	22.56	0.05	8.40E-03	6.72	0.01	2.30E-03	1.84	4.06E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Generator	2,422	15,086	33.26	0.30	1.89	4.17E-03	0.02	0.10	2.10E-04	0.89	5.53	0.01
	X-Ray Truck	77,373	481,909	1,062	0.05	0.33	7.25E-04	0.15	0.95	2.10E-03	6.73	41.92	0.09

Activity 6: Testing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	112,200	247.36	0.03	16.92	0.04	8.40E-03	5.04	0.01	2.30E-03	1.38	3.05E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	86,983	191.76	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Air Compressor/Dryer	88,895	167,780	369.89	0.62	1.17	2.58E-03	0.61	1.15	2.54E-03	0.89	1.68	3.70E-03
	RT Forklift	21,596	40,759	89.86	0.37	0.69	1.53E-03	0.10	0.19	4.13E-04	1.22	2.30	5.07E-03
	Generator	11,243	21,220	46.78	0.24	0.45	9.83E-04	0.08	0.14	3.18E-04	0.89	1.68	3.70E-03

Activity 7: Backfill		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	264,706	583.58	0.03	39.92	0.09	8.40E-03	11.89	0.03	2.30E-03	3.26	7.19E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	1,382,002	3,047	0.09	1.66	3.66E-03	0.40	7.49	0.02	0.74	13.91	0.03
	Dozer	74,585	1,407,704	3,103	0.09	1.77	3.90E-03	0.37	6.92	0.02	1.89	35.68	0.08
	Excavator	73,888	1,394,562	3,074	0.07	1.40	3.09E-03	0.36	6.80	0.01	0.82	15.51	0.03
	Generator	11,243	212,202	467.83	0.24	4.46	0.01	0.08	1.44	3.18E-03	0.89	16.77	0.04
	Roller	41,867	790,192	1,742	0.13	2.52	5.55E-03	0.22	4.18	0.01	1.19	22.44	0.05

Activity 8: Corrosion Protection		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	93,500	206.13	0.03	14.10	0.03	8.40E-03	4.20	0.01	2.30E-03	1.15	2.54E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Air Compressor	21,856	136,131	300.12	0.10	0.60	1.31E-03	0.13	0.81	1.78E-03	0.89	5.53	0.01
	Generator	2,422	15,086	33.26	0.30	1.89	4.17E-03	0.02	0.10	2.10E-04	0.89	5.53	0.01
	Paint Truck	77,373	481,909	1,062	0.05	0.33	7.25E-04	0.28	1.76	3.88E-03	6.73	41.92	0.09

Activity 9: Reclaim		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	705,883	1,556	0.03	106.45	0.23	8.40E-03	31.71	0.07	2.30E-03	8.70	0.02
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Backhoe	15,862	598,758	1,320	0.44	16.74	0.04	0.17	6.34	0.01	3.02	113.89	0.25
	Blade	73,223	2,764,003	6,094	0.09	3.32	7.33E-03	0.31	11.53	0.03	0.74	27.81	0.06
	Farm Tractor	77,373	2,920,659	6,439	0.05	1.99	4.39E-03	0.29	10.95	0.02	6.73	254.06	0.56

Denbury Snowy River CO2 Project Emissions
Group 7 Road Maintenance and Construction

New Roads

Miles 0.72

Activity 1: Road Clear										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	7,920	17.46	0.42	549.37	1.21
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor/Dryer				—	—									
	Blade	300.00	3.00	2.00	1.44	17.28				4.95	85.54	0.19	20.71	357.84	0.79
	Dozer	400.00	3.00	2.00	1.44	17.28				41.39	715.14	1.58	98.38	1,700	3.75
	Scraper	400.00	3.00	2.00	1.44	17.28				43.35	749.03	1.65	102.59	1,773	3.91

Activity 2: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	10,559	23.28	0.42	732.50	1.61
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	300.00	2.00	2.00	1.44	17.28				4.95	85.54	0.19	20.71	357.84	0.79
	Dozer	400.00	3.00	2.00	1.44	17.28				41.39	715.14	1.58	98.38	1,700	3.75
	Dump Truck	350.00	4.00	2.00	1.44	17.28				7.76	134.12	0.30	33.63	581.12	1.28
	Scraper	400.00	3.00	2.00	1.44	17.28				43.35	749.03	1.65	102.59	1,773	3.91

Two-Tracks Road Modifications

Miles 0.84

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	12,319	27.16	0.42	854.58	1.88
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						12	2	100	1.65	3,963	8.74	4.58	10,997	24.24
Construction Equipment	Blade	300.00	2.00	2.00	1.68	20.16				4.95	99.79	0.22	20.71	417.48	0.92
	Dozer	400.00	3.00	2.00	1.68	20.16				41.39	834.33	1.84	98.38	1,983	4.37
	Dump Truck	350.00	4.00	2.00	1.68	20.16				7.76	156.48	0.34	33.63	677.98	1.49
	Scraper	400.00	3.00	2.00	1.68	20.16				43.35	873.87	1.93	102.59	2,068	4.56

Existing Roads

Miles —

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						2	1	100	6.11	—	—	0.42	—	—
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	—	—	4.58	—	—
Construction Equipment	Blade	300.00	2.00	2.00	—	—				4.95	—	—	20.71	—	—

Denbury Snowy River CO2 Project Emissions
Group 7 Road Maintenance and Construction

New Roads

Miles 0.72

Activity 1: Road Clear		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	217.64	0.48	0.14	178.24	0.39	0.05	62.21	0.14	0.29	377.65	0.83
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor/Dryer												
	Blade	1.30	22.52	0.05	1.26	21.85	0.05	0.19	3.35	7.38E-03	1.65	28.51	0.06
	Dozer	7.76	134.14	0.30	7.53	130.12	0.29	0.37	6.37	0.01	7.10	122.65	0.27
	Scraper	8.06	139.21	0.31	7.81	135.03	0.30	0.37	6.34	0.01	7.34	126.84	0.28

Activity 2: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	290.18	0.64	0.14	237.65	0.52	0.05	82.94	0.18	0.29	503.54	1.11
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	22.52	0.05	1.26	21.85	0.05	0.19	3.35	7.38E-03	1.65	28.51	0.06
	Dozer	7.76	134.14	0.30	7.53	130.12	0.29	0.37	6.37	0.01	7.10	122.65	0.27
	Dump Truck	2.08	35.88	0.08	2.01	34.80	0.08	0.35	6.07	0.01	2.72	46.98	0.10
	Scraper	8.06	139.21	0.31	7.81	135.03	0.30	0.37	6.34	0.01	7.34	126.84	0.28

Two-Tracks Road Modifications

Miles 0.84

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	338.55	0.75	0.14	277.26	0.61	0.05	96.77	0.21	0.29	587.46	1.30
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	347.45	0.77	0.09	206.02	0.45	0.01	35.76	0.08	0.41	972.24	2.14
Construction Equipment	Blade	1.30	26.28	0.06	1.26	25.49	0.06	0.19	3.91	8.61E-03	1.65	33.26	0.07
	Dozer	7.76	156.50	0.35	7.53	151.81	0.33	0.37	7.43	0.02	7.10	143.09	0.32
	Dump Truck	2.08	41.86	0.09	2.01	40.61	0.09	0.35	7.08	0.02	2.72	54.81	0.12
	Scraper	8.06	162.41	0.36	7.81	157.54	0.35	0.37	7.40	0.02	7.34	147.98	0.33

Existing Roads

Miles —

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	—	—	0.14	—	—	0.05	—	—	0.29	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	—	—	0.09	—	—	0.01	—	—	0.41	—	—
Construction Equipment	Blade	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—

Denbury Snowy River CO2 Project Emissions
Group 7 Road Maintenance and Construction

New Roads

Miles 0.72

Activity 1: Road Clear		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	242,352	534.29	0.03	36.55	0.08	8.40E-03	10.89	0.02	2.30E-03	2.99	6.58E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	6.79	0.01
Construction Equipment	Air Compressor/Dryer							—	—	—	—	—	—
	Blade	73,223	1,265,293	2,789	0.09	1.52	3.35E-03	0.46	7.91	0.02	0.74	12.73	0.03
	Dozer	134,685	2,327,359	5,131	0.51	8.80	0.02	0.61	10.55	0.02	1.89	32.66	0.07
	Scraper	133,797	2,312,017	5,097	0.53	9.17	0.02	0.61	10.55	0.02	3.04	52.57	0.12

Activity 2: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	323,136	712.39	0.03	48.73	0.11	8.40E-03	14.52	0.03	2.30E-03	3.98	8.78E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	1,265,293	2,789	0.09	1.52	3.35E-03	0.46	7.91	0.02	0.74	12.73	0.03
	Dozer	134,685	2,327,359	5,131	0.51	8.80	0.02	0.61	10.55	0.02	1.89	32.66	0.07
	Dump Truck	132,987	2,298,007	5,066	0.13	2.23	4.93E-03	0.53	9.23	0.02	6.73	116.30	0.26
	Scraper	133,797	2,312,017	5,097	0.53	9.17	0.02	0.61	10.55	0.02	3.04	52.57	0.12

Two-Tracks Road Modifications

Miles 0.84

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	376,992	831.13	0.03	56.85	0.13	8.40E-03	16.93	0.04	2.30E-03	4.65	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	521,896	1,151	0.46	1,112	2.45	2.00E-03	4.80	0.01	3.77E-03	9.06	0.02
Construction Equipment	Blade	73,223	1,476,175	3,254	0.09	1.78	3.91E-03	0.46	9.23	0.02	0.74	14.85	0.03
	Dozer	134,685	2,715,252	5,986	0.51	10.27	0.02	0.61	12.31	0.03	1.89	38.11	0.08
	Dump Truck	132,987	2,681,008	5,911	0.13	2.61	5.75E-03	0.53	10.77	0.02	6.73	135.69	0.30
	Scraper	133,797	2,697,353	5,947	0.53	10.70	0.02	0.61	12.31	0.03	3.04	61.34	0.14

Existing Roads

Miles —

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	—	—	0.03	—	—	8.40E-03	—	—	2.30E-03	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	—	—	0.46	—	—	2.00E-03	—	—	3.77E-03	—	—
Construction Equipment	Blade	73,223	—	—	0.09	—	—	0.46	—	—	0.74	—	—

Denbury Snowy River CO2 Project Emissions
Group 7 Fugitive Dust Emissions from Paved Roads

Summary of Fugitive Emissions

Paved Roads emission factor from AP-42, Section 13.2.1: *Paved Roads* (01/11)

$$E = k(sL)^{0.91}(W)^{1.02}(1-P/(4*365))$$

where:

sL =	0.6	road surface silt loading silt loading (g/m2) [Table 13.2.1-2, for Ubiquitous Baseline, <500]
W_{LDT} =	4	tons [Average vehicle weight]
$W_{Tractor}$ =	25	tons [Average vehicle weight]
k =	0.0022	lb/VMT [Table 13.2.1-1, for PM_{10}]
k =	0.00054	lb/VMT [Table 13.2.1-1, for $PM_{2.5}$]
P =	100	days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.1-2]

1/2 Ton Trucks (light-duty trucks)

$E_{(PM10)}$ = 5.29E-03 lb/VMT

$E_{(PM2.5)}$ = 1.30E-03 lb/VMT

126	Duration of Construction (days)-Well Pad Construction
14	Duration of Construction (days)-Flow/Bulk Line Construction
0	Duration of Construction (days)-Pump Station Construction
10	Duration of Construction (days)-Road Construction (existing and two-track roads)

Tractor Trailers

$E_{(PM10)}$ = 3.43E-02 lb/VMT

$E_{(PM2.5)}$ = 8.43E-03 lb/VMT

2	Equipment Delivery (days) -Well Pad Construction
2	Equipment Delivery (days) -Flow/Bulk Line Construction
0	Equipment Delivery (days) -Pump Station Construction
2	Equipment Delivery (days) -Road Construction (existing and two-track roads)

Project Segment

Equipment Type	Average Vehicle Weight (tons)[a]	Well Pad Construction			Flow/Bulk Line Construction			Pump Station Construction			Road Construction		
		VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]
Light Duty Trucks	4	100	22	277288	100	135	186002	100	25	0	100	12	11448
Tractor Trailers	25	100	21	4200	100	106	21200	100	17	0	100	12	2400
Total VMT				281488			207202			0			13848
a - Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.													
PM10 (tons)				**0.81**			**0.86**			**0.00**			**0.07**
PM2.5 (tons)				**0.20**			**0.21**			**0.00**			**0.02**

Project Totals

Total Paved Road Emissions	
Pollutant	**tons**
PM_{10}	**1.73**
$PM_{2.5}$	**0.43**

[a] *Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.*

[b] VMT per day are projected based on experience from previous construction projects.

[c] Vehicle Miles Traveled (VMT) are based on the vehicle quantity , project duration, and experience from previous construction projects.

Denbury Snowy River CO2 Project Emissions
Group 7 Fugitive Dust Emissions from Unpaved Roads

Summary of Fugitive Emissions

Unpaved Roads emission factor from AP-42, Section 13.2.2: *Unpaved Roads* (11/06); Equations a1 and 2

$$E = k\,(s/12)^a (W/3)^b \qquad (1a)$$

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight

Table 13.2.2-2 - Constants for Equation 1a

Constant	PM2.5	PM10
k (lb/VMT)	0.15	1.5
a	0.9	0.9
b	0.45	0.45

Surface Silt (s) content based on Table 13.2.2-1 - construction sites

s = 8.50

$$E_{ext} = E\,[(365 - P)/365] \qquad (2)$$

E_{ext} = annual size-specific emisison factor extrapolated for natural mitigation, lb/VMT
E = emisison factor from Equation 1a
P = days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.2-1

P = 100

Equipment	Construction Duration (days)	Miles per Day	Quantity	Total Vehicle Miles Traveled[a] (VMT)	W: Mean Vehicle Weight (tons)[b]	Emission Factors (lb/VMT)[c]		Emissions (tons)		Controlled Emissions (tons)	
						PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Well Pad Construction											
1/2 Ton Trucks	4.88	100	0	8,648	12.02941176	1.492	0.149	6.450	0.645	3.2	0.3
							Total (tons)	**6.450**	**0.645**	**3.2**	**0.3**

(a) VMT per day are projected based on experience from previous construction projects
(b) Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.
(c) AP 42 Section 13.2.2 Unpaved Roads, dated November 2006, Equations 1a and 2

Denbury Snowy River CO2 Project Emissions
Group 7 Fugitive Dust Emissions from Earthmoving Activities

Construction Activity	Activity Type	Approximate Pipeline Length or Road Length (mi)	Excavation Volume[a] (ft^3)	Temporary Workspace for Construction (acres)[b]
Flowline Injection Well 08	Pipeline	0.61	58,388	0.45
Flowline Injection Well 15	Pipeline	0.96	91,093	0.70
BLM Two-Track Injection Well 15	Access Roads	0.1	15,840	0.36
New Road Injection Well 08	Access Roads	0.1	15,840	0.36
New Road Injection Well 15	Access Roads	0.12	19,008	0.44
Injection Well 08 Construction Pad	Well Pad Construction	--	601,128	4.6
Injection Well 15 Construction Pad	Well Pad Construction	--	601,128	4.6

Project Construction Activity Particulate Matter Emissions

Construction Activity	Excavation[a] (tons)	Excavation PM_{10} Emission Factor[c] (lb/ton)	Pipeline Excavation PM_{10} Emissions (tons)	Backfilling[a] (tons)	Backfilling PM_{10} Emission Factor[b] (lb/ton)	Backfilling PM10 Emissions (tpy)	Windblown Dust Area (acre)	PM_{10} Windblown Dust Emission Factor[d,e] (tons/acre)	Windblown Dust PM_{10} Emissions - Uncontrolled (tons)	Total Construction Activity PM_{10} emissions (tons)	Total Controlled Construction Activity PM_{10} emissions[g] (tons)	Total Construction Activity $PM_{2.5}$ emissions[f] (tons)	Total Controlled Construction Activity $PM_{2.5}$ emissions[g] (tons)
Flowline Injection Well 08	2,919	0.058	0.085	2,919	0.012	0.018	0.4	3.80E-01	0.17	0.272	0.136	0.057	0.028
Flowline Injection Well 15	4,555	0.058	0.132	4,555	0.012	0.027	0.7	3.80E-01	0.26	0.424	0.212	0.088	0.044
BLM Two-Track Injection Well 15	792	0.058	0.023	792	0.012	0.005	0.4	3.80E-01	0.14	0.166	0.083	0.035	0.017
New Road Injection Well 08	792	0.058	0.023	792	0.012	0.005	0.4	3.80E-01	0.14	0.166	0.083	0.035	0.017
New Road Injection Well 15	950	0.058	0.028	950	0.012	0.006	0.4	3.80E-01	0.17	0.199	0.100	0.041	0.021
Injection Well 08 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
Injection Well 15 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
									Total	**6.827**	**3.414**	**1.420**	**0.710**

(a) Excavation of well pad sites assumed to be 3 feet deep. Excavation and backfilling assumes pipeline will be 6 ft x 3 ft x approximate length (ft) for the Project component. Excavation for road construction assumes road excavation is 30 ft width x 1 ft deep x approximate road length (ft). Soil density is assumed to be 100 lb/ft^3

(b) Temporary workspace acres for roadways assumed to be 30 ft width x approximate road length (mi).

(c) Excavation and backfilling factors from AP-42, Table 11.9-4 (dated 7/98), assuming 100% of TSP is PM_{10}

(d) Windblown dust factor from AP-42 Table 11.9-4 Uncontrolled Particulate Emission Factors for Open Dust Sources

(e) PM_{10} emissions are conservatively assumed to be 100% of TSP.

(f) $PM_{2.5}$ emissions were calculated following the SCAQMD Particulate Matter $PM_{2.5}$ Significance Thresholds and Calculation Methodology (2006). For construction and demolition fugitive dust sources, 20.8% of the PM_{10} would be $PM_{2.5}$

(g) Controls are conservatively assumed to have a 50% reduction factor based on Emission Factors for Paved and Unpaved Roads (1/2015) Utah DEQ

Note: Pipeyards/wareyards are assumed to have negligible particulate emissions because of no construction activities.

Denbury Snowy River CO2 Project Emissions
Construction Group 8 Emissions Summary

Uncontrolled Emissions Summary (U.S. Tons Total)

Category	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOC	CO_2	CH_4	N_2O	20-year GWP CO_2e	100- year GWP CO_2e	HAPS
Well Construction	0.67	0.42	0.03	0.03	5.06E-03	0.05	299.58	6.28E-03	5.11E-03	301.49	301.16	5.05E-03
Flow/Bulk Line Construction	0.32	0.18	0.01	0.01	2.62E-03	0.03	94.78	0.01	7.96E-04	95.98	95.36	4.09E-03
Road Construction	0.10	0.05	4.85E-03	4.10E-03	8.52E-04	7.76E-03	58.65	2.75E-03	3.98E-04	58.99	58.84	1.28E-03
Paved Roads			2.03	0.50								
Unpaved Roads			-	-								
Earthmoving			15.81	7.91								
Total	1.09	0.65	17.90	8.45	8.53E-03	0.08	453.01	0.02	6.31E-03	456.46	455.36	0.01

Controlled Emissions Summary (U.S. Tons Total)

Category	PM_{10}	$PM_{2.5}$
Well Construction	0.03	0.03
Flow/Bulk Line Construction	0.01	0.01
Road Construction	4.85E-03	4.10E-03
Paved Roads	2.03	0.50
Unpaved Roads	—	—
Earthmoving	7.91	1.64
Controlled Total	9.99	2.19

Denbury Snowy River CO2 Project Emissions
Group 8 Wellpad Construction

Total Disturbed Acres **9.20**

Activity 1: Drill Pad Clearing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						3.00	1.00	100.00	6.11	3,373	7.44	0.42	233.99	0.52
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						3.00	2.00	100.00	1.65	990.66	2.18	4.58	2,749	6.06
Construction Equipment	Backhoe														
	Dozer	153.00	2.00	0.20	1.84	22.08				6.06	133.89	0.30	19.27	425.53	0.94
	Excavator	160.00	1.00	0.20	1.84	22.08				5.28	116.67	0.26	17.08	377.21	0.83

Activity 2: Drill Pad Grading

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6.00	1.00	100.00	6.11	33,732	74.37	0.42	2,340	5.16
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						5.00	2.00	100.00	1.65	1,651	3.64	4.58	4,582	10.10
Construction Equipment	Blade	140.00	1.00	0.25	2.30	27.60				6.09	167.98	0.37	19.47	537.36	1.18
	Dozer	153.00	1.00	1.00	9.20	110.40				6.06	669.43	1.48	19.27	2,128	4.69
	Roller Compactor	156.00	1.00	0.25	2.30	27.60				10.67	294.50	0.65	25.19	695.26	1.53
	Scraper	400.00	3.00	1.00	9.20	110.40				43.35	4,785	10.55	102.59	11,326	24.97

Activity 3: Drill Pad Drilling

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						4.00	1.00	100.00	6.11	146,659	323.33	0.42	10,174	22.43
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4.00	2.00	100.00	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment (Drill Rig)	Generator	3,000	4.00	60.00	60.00	720.00				88.22	63,515	140.03	234.63	168,931	372.43

Activity 4: Drill Pad Construction

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days)	Duration (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9.00	1.00	100.00	6.11	302,485	666.86	0.42	20,983	46.26
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9.00	2.00	100.00	1.65	2,972	6.55	4.58	8,247	18.18
Construction Equipment	Air Compressor	50.00	1.00	55.00	55.00	660.00				5.34	3,523	7.77	48.26	31,853	70.22
	Backhoe	75.00	1.00	20.00	20.00	240.00				22.17	5,320	11.73	42.76	10,263	22.63
	Crane	200.00	1.00	10.00	10.00	120.00				7.29	874.95	1.93	27.67	3,320	7.32
	Excavator	325.00	1.00	40.00	40.00	480.00				26.24	12,594	27.77	65.08	31,241	68.87
	Generator	25.00	3.00	55.00	55.00	660.00				14.43	9,525	21.00	36.59	24,150	53.24
	Trencher	75.00	1.00	40.00	40.00	480.00				25.84	12,402	27.34	61.92	29,720	65.52

Denbury Snowy River CO2 Project Emissions
Group 8 Wellpad Construction

Total Disturbed Acres **9.20**

Activity 1: Drill Pad Clearing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	92.70	0.20	0.14	75.92	0.17	0.05	26.50	0.06	0.29	160.85	0.35
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	86.86	0.19	0.09	51.50	0.11	0.01	8.94	0.02	0.41	243.06	0.54
Construction Equipment	Backhoe												
	Dozer	1.45	31.98	0.07	1.40	31.02	0.07	0.11	2.52	5.56E-03	0.96	21.23	0.05
	Excavator	1.24	27.28	0.06	1.20	26.46	0.06	0.12	2.54	5.61E-03	0.85	18.80	0.04

Activity 2: Drill Pad Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	926.97	2.04	0.14	759.17	1.67	0.05	264.96	0.58	0.29	1,609	3.55
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	144.77	0.32	0.09	85.84	0.19	0.01	14.90	0.03	0.41	405.10	0.89
Construction Equipment	Blade	1.45	39.96	0.09	1.40	38.76	0.09	0.12	3.26	7.19E-03	0.97	26.71	0.06
	Dozer	1.45	159.90	0.35	1.40	155.10	0.34	0.11	12.62	0.03	0.96	106.15	0.23
	Roller Compactor	2.72	75.06	0.17	2.64	72.81	0.16	0.11	3.11	6.87E-03	1.67	46.07	0.10
	Scraper	8.06	889.39	1.96	7.81	862.70	1.90	0.37	40.52	0.09	7.34	810.38	1.79

Activity 3: Drill Pad Drilling		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	4,030	8.89	0.14	3,301	7.28	0.05	1,152	2.54	0.29	6,994	15.42
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment (Drill Rig)	Generator	10.64	7,661	16.89	10.32	7,431	16.38	0.42	302.18	0.67	13.21	9,510	20.97

Activity 4: Drill Pad Construction		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	8,313	18.33	0.14	6,808	15.01	0.05	2,376	5.24	0.29	14,424	31.80
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	260.59	0.57	0.09	154.51	0.34	0.01	26.82	0.06	0.41	729.18	1.61
Construction Equipment	Air Compressor	0.40	264.67	0.58	0.39	256.73	0.57	0.03	19.56	0.04	1.77	1,167	2.57
	Backhoe	2.97	713.70	1.57	2.88	692.29	1.53	0.03	6.60	0.01	4.11	985.79	2.17
	Crane	1.70	203.95	0.45	1.65	197.83	0.44	0.15	17.57	0.04	2.29	274.52	0.61
	Excavator	5.40	2,592	5.71	5.24	2,514	5.54	0.35	168.30	0.37	5.07	2,432	5.36
	Generator	1.64	1,084	2.39	1.59	1,052	2.32	0.02	13.91	0.03	3.42	2,256	4.97
	Trencher	3.77	1,809	3.99	3.66	1,754	3.87	0.08	40.29	0.09	2.30	1,104	2.43

Denbury Snowy River CO2 Project Emissions
Group 8 Wellpad Construction

Total Disturbed Acres 9.20

Activity 1: Drill Pad Clearing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	103,224	227.57	0.03	15.57	0.03	8.40E-03	4.64	0.01	2.30E-03	1.27	2.80E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	130,474	287.65	0.46	278.04	0.61	2.00E-03	1.20	2.65E-03	3.77E-03	2.26	4.99E-03
Construction Equipment	Backhoe										0.00E+00	0.00E+00	0.00E+00
	Dozer	43,104	951,739	2,098	0.07	1.65	3.64E-03	0.23	5.16	0.01	1.89	41.74	0.09
	Excavator	43,580	962,237	2,121	0.06	1.41	3.11E-03	0.24	5.39	0.01	0.82	18.15	0.04

Activity 2: Drill Pad Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,032,240	2,276	0.03	155.66	0.34	8.40E-03	46.37	0.10	2.30E-03	12.72	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	217,457	479.41	0.46	463.40	1.02	2.00E-03	2.00	4.41E-03	3.77E-03	3.77	8.32E-03
Construction Equipment	Blade	44,593	1,230,761	2,713	0.07	2.06	4.55E-03	0.21	5.90	0.01	0.74	20.33	0.04
	Dozer	43,104	4,758,694	10,491	0.07	8.25	0.02	0.23	25.79	0.06	1.89	208.68	0.46
	Roller Compactor	41,867	1,155,529	2,548	0.13	3.68	8.11E-03	0.24	6.57	0.01	1.19	32.82	0.07
	Scraper	133,797	14,771,217	32,565	0.53	58.58	0.13	0.61	67.42	0.15	3.04	335.88	0.74

Activity 3: Drill Pad Drilling		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	4,488,000	9,894	0.03	676.80	1.49	8.40E-03	201.60	0.44	2.30E-03	55.30	0.12
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	1.25	2.75E-03
Construction Equipment (Drill Rig)	Generator	148,388	106,839,491	235,541	1.00	722.78	1.59	4.58	3,298	7.27	0.89	639.77	1.41

Activity 4: Drill Pad Construction		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	9,256,500	20,407	0.03	1,396	3.08	8.40E-03	415.80	0.92	2.30E-03	114.06	0.25
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	391,422	862.94	0.46	834.12	1.84	2.00E-03	3.60	7.94E-03	3.77E-03	1.25	2.75E-03
Construction Equipment	Air Compressor	11,243	7,420,495	16,359	0.24	155.95	0.34	0.08	50.38	0.11	0.89		
	Backhoe	9,117	2,188,139	4,824	0.27	65.37	0.14	0.11	27.48	0.06	3.02	724.10	1.60
	Crane	54,272	6,512,615	14,358	0.15	18.19	0.04	0.31	36.64	0.08	1.75	209.56	0.46
	Excavator	130,035	62,416,732	137,605	0.34	162.80	0.36	0.50	238.16	0.53	0.82	394.52	0.87
	Generator	5,732	3,783,439	8,341	0.30	198.81	0.44	0.04	25.19	0.06	0.89	586.46	1.29
	Trencher	30,506	14,643,005	32,282	0.17	80.93	0.18	0.11	54.96	0.12	1.68	808.34	1.78

Denbury Snowy River CO2 Project Emissions
Group 8 Flowline Construction

Total Miles **2.57**

Activity 1: Clearing ROW

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						16	1	100	6.11	50,297	110.89	0.42	3,489	7.69
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						16	2	100	1.65	5,284	11.65	4.58	14,662	32.32
Construction Equipment	Backhoe				0.00E+00	0.00E+00									
	Blade	260.00	2.0	2.00	5.14	61.73				4.95	305.57	0.67	20.71	1,278	2.82
	Dozer	240.00	8.0	2.00	5.14	61.73				5.30	327.13	0.72	21.66	1,337	2.95
	Water Truck	185.00	6.0	2.00	5.14	61.73				2.80	173.14	0.38	16.14	996.40	2.20

Activity 2: Trenching

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						15	1	100	6.11	23,577	51.98	0.42	1,635	3.61
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						15	2	100	1.65	4,953	10.92	4.58	13,746	30.30
Construction Equipment	Backhoe	110.00	1.0	1.00	2.57	30.87				27.40	845.70	1.86	41.31	1,275	2.81
	Excavator	236.00	11.0	1.00	2.57	30.87				4.15	127.95	0.28	18.73	578.19	1.27
	Trencher	420.00	3.0	1.00	2.57	30.87				167.78	5,179	11.42	342.02	10,557	23.27

Activity 3: Stringing

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						10	1	100	6.11	15,718	34.65	0.42	1,090	2.40
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Excavator w/ Vacculift	428.00	2.0	1.00	2.57	30.87				26.24	809.86	1.79	65.08	2,009	4.43
	RT Forklift	65.00	2.0	1.00	2.57	30.87				12.90	398.04	0.88	95.48	2,947	6.50
	Generator	50.00	2.0	1.00	2.57	30.87				5.34	164.75	0.36	48.26	1,490	3.28
	Skid Truck	185.00	2.0	1.00	2.57	30.87				2.80	86.57	0.19	16.14	498.20	1.10
	Water Truck	185.00	2.0	1.00	2.57	30.87				2.80	86.57	0.19	16.14	498.20	1.10

Activity 4: Welding and Lower In

Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	CO EF (g/mile [Traffic] g/hr [construction equipment])	CO Emissions (grams)	CO Emissions (lbs)	NO_x EF (g/mile [Traffic] g/hr [construction equipment])	NO_x Emissions (grams)	NO_x Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						54	1	100	6.11	84,877	187.12	0.42	5,888	12.98
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						41	2	100	1.65	13,539	29.85	4.58	37,572	82.83
Construction Equipment	Backhoe	110.00	2.0	1.00	2.57	30.87				27.40	845.70	1.86	41.31	1,275	2.81
	Blade	200.00	2.0	1.00	2.57	30.87				4.95	152.78	0.34	20.71	639.18	1.41
	RT Crane	185.00	2.0	1.00	2.57	30.87				7.29	225.05	0.50	27.67	853.95	1.88
	Dozer	240.00	2.0	1.00	2.57	30.87				5.30	163.57	0.36	21.66	668.41	1.47
	Excavator	236.00	2.0	1.00	2.57	30.87				4.15	127.95	0.28	18.73	578.19	1.27
	RT Forklift	65.00	2.0	1.00	2.57	30.87				12.90	398.04	0.88	95.48	2,947	6.50
	Generator	50.00	2.0	1.00	2.57	30.87				5.34	164.75	0.36	48.26	1,490	3.28
	Sideboom	305.00	10.0	1.00	2.57	30.87				38.89	1,200	2.65	129.26	3,990	8.80
	Skid Truck	185.00	2.0	1.00	2.57	30.87				2.80	86.57	0.19	16.14	498.20	1.10
	Tack Rig	255.00	2.0	1.00	2.57	30.87				5.30	163.57	0.36	21.66	668.41	1.47
	Water Truck	185.00	2.0	1.00	2.57	30.87				2.80	86.57	0.19	16.14	498.20	1.10
	Welding Machine	35.00	14.0	1.00	2.57	30.87				5.79	178.73	0.39	51.09	1,577	3.48
	Welding Truck	300.00	10.0	1.00	2.57	30.87				2.80	86.57	0.19	16.14	498.20	1.10

Denbury Snowy River CO2 Project Emissions
Group 8 Flowline Construction

Total Miles 2.57

Activity 1: Clearing ROW		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,382	3.05	0.14	1,132	2.50	0.05	395.08	0.87	0.29	2,398	5.29
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	463.26	1.02	0.09	274.69	0.61	0.01	47.68	0.11	0.41	1,296	2.86
Construction Equipment	Backhoe												
	Blade	1.30	80.46	0.18	1.26	78.05	0.17	0.19	11.96	0.03	1.65	101.84	0.22
	Dozer	1.38	85.07	0.19	1.34	82.52	0.18	0.20	12.19	0.03	1.72	106.23	0.23
	Water Truck	0.92	56.96	0.13	0.89	55.25	0.12	0.20	12.58	0.03	1.37	84.77	0.19

Activity 2: Trenching		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	647.91	1.43	0.14	530.62	1.17	0.05	185.19	0.41	0.29	1,124	2.48
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	434.31	0.96	0.09	257.52	0.57	0.01	44.70	0.10	0.41	1,215	2.68
Construction Equipment	Backhoe	6.46	199.44	0.44	6.27	193.45	0.43	0.05	1.48	3.26E-03	6.65	205.31	0.45
	Excavator	1.16	35.76	0.08	1.12	34.68	0.08	0.20	6.02	0.01	1.54	47.53	0.10
	Trencher	27.66	853.65	1.88	26.83	828.04	1.83	0.40	12.36	0.03	23.86	736.30	1.62

Activity 3: Stringing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	431.94	0.95	0.14	353.75	0.78	0.05	123.46	0.27	0.29	749.52	1.65
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Excavator w/ Vacculift	5.40	166.67	0.37	5.24	161.67	0.36	0.35	10.82	0.02	5.07	156.41	0.34
	RT Forklift	1.43	44.05	0.10	1.38	42.73	0.09	0.06	1.81	3.98E-03	2.57	79.37	0.17
	Generator	0.40	12.38	0.03	0.39	12.01	0.03	0.03	0.91	2.02E-03	1.77	54.58	0.12
	Skid Truck	0.92	28.48	0.06	0.89	27.62	0.06	0.20	6.29	0.01	1.37	42.39	0.09
	Water Truck	0.92	28.48	0.06	0.89	27.62	0.06	0.20	6.29	0.01	1.37	42.39	0.09

Activity 4: Welding and Lower In		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	2,332	5.14	0.14	1,910	4.21	0.05	666.70	1.47	0.29	4,047	8.92
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	1,187	2.62	0.09	703.89	1.55	0.01	122.18	0.27	0.41	3,322	7.32
Construction Equipment	Backhoe	6.46	199.44	0.44	6.27	193.45	0.43	0.05	1.48	3.26E-03	6.65	205.31	0.45
	Blade	1.30	40.23	0.09	1.26	39.02	0.09	0.19	5.98	0.01	1.65	50.92	0.11
	RT Crane	1.70	52.46	0.12	1.65	50.88	0.11	0.15	4.52	0.01	2.29	70.61	0.16
	Dozer	1.38	42.54	0.09	1.34	41.26	0.09	0.20	6.10	0.01	1.72	53.12	0.12
	Excavator	1.16	35.76	0.08	1.12	34.68	0.08	0.20	6.02	0.01	1.54	47.53	0.10
	RT Forklift	1.43	44.05	0.10	1.38	42.73	0.09	0.06	1.81	3.98E-03	2.57	79.37	0.17
	Generator	0.40	12.38	0.03	0.39	12.01	0.03	0.03	0.91	2.02E-03	1.77	54.58	0.12
	Sideboom	6.83	210.72	0.46	6.62	204.40	0.45	0.27	8.26	0.02	8.67	267.54	0.59
	Skid Truck	0.92	28.48	0.06	0.89	27.62	0.06	0.20	6.29	0.01	1.37	42.39	0.09
	Tack Rig	1.38	42.54	0.09	1.34	41.26	0.09	0.20	6.10	0.01	1.72	53.12	0.12
	Water Truck	0.92	28.48	0.06	0.89	27.62	0.06	0.20	6.29	0.01	1.37	42.39	0.09
	Welding Machine	0.45	14.01	0.03	0.44	13.59	0.03	0.03	0.98	2.15E-03	1.88	57.99	0.13
	Welding Truck	0.92	28.48	0.06	0.89	27.62	0.06	0.20	6.29	0.01	1.37	42.39	0.09

Denbury Snowy River CO2 Project Emissions

Group 8 Flowline Construction

Total Miles 2.57

Activity 1: Clearing ROW		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,539,173	3,393	0.03	232.11	0.51	8.40E-03	69.14	0.15	2.30E-03	18.97	0.04
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	695,862	1,534	0.46	1,483	3.27	2.00E-03	6.40	0.01	3.77E-03	12.08	0.03
Construction Equipment	Backhoe							0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Blade	73,223	4,520,167	9,965	0.09	5.44	0.01	0.40	24.50	0.05	0.74	45.48	0.10
	Dozer	74,585	4,604,233	10,151	0.09	5.79	0.01	0.37	22.62	0.05	1.89	116.69	0.26
	Water Truck	77,373	4,776,356	10,530	0.05	3.26	7.19E-03	0.28	17.44	0.04	6.73	415.48	0.92

Activity 2: Trenching		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	721,487	1,591	0.03	108.80	0.24	8.40E-03	32.41	0.07	2.30E-03	8.89	0.02
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	652,370	1,438	0.46	1,390	3.06	2.00E-03	6.00	0.01	3.77E-03	11.32	0.02
Construction Equipment	Backhoe	15,862	489,596	1,079	0.44	13.69	0.03	0.17	5.18	0.01	3.02	93.12	0.21
	Excavator	73,888	2,280,624	5,028	0.07	2.29	5.05E-03	0.36	11.12	0.02	0.82	25.37	0.06
	Trencher	131,248	4,051,078	8,931	1.60	49.33	0.11	0.64	19.79	0.04	1.68	51.98	0.11

Activity 3: Stringing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	480,991	1,060	0.03	72.53	0.16	8.40E-03	21.61	0.05	2.30E-03	5.93	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Excavator w/ Vacculift	130,035	4,013,625	8,849	0.34	10.47	0.02	0.65	20.17	0.04	0.82	25.37	0.06
	RT Forklift	21,596	666,565	1,470	0.37	11.34	0.02	0.10	3.06	6.75E-03	1.22	37.64	0.08
	Generator	11,243	347,029	765.07	0.24	7.29	0.02	0.08	2.36	5.19E-03	0.89	27.43	0.06
	Skid Truck	77,373	2,388,178	5,265	0.05	1.63	3.59E-03	0.28	8.72	0.02	6.73	207.74	0.46
	Water Truck	77,373	2,388,178	5,265	0.05	1.63	3.59E-03	0.28	8.72	0.02	6.73	207.74	0.46

Activity 4: Welding and Lower In		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	2,597,354	5,726	0.03	391.69	0.86	8.40E-03	116.67	0.26	2.30E-03	32.01	0.07
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	1,783,145	3,931	0.46	3,800	8.38	2.00E-03	16.40	0.04	3.77E-03	30.95	0.07
Construction Equipment	Backhoe	15,862	489,596	1,079	0.44	13.69	0.03	0.17	5.18	0.01	3.02	93.12	0.21
	Blade	73,223	2,260,083	4,983	0.09	2.72	5.99E-03	0.31	9.42	0.02	0.74	22.74	0.05
	RT Crane	54,272	1,675,140	3,693	0.15	4.68	0.01	0.28	8.72	0.02	1.75	53.90	0.12
	Dozer	74,585	2,302,117	5,075	0.09	2.89	6.38E-03	0.37	11.31	0.02	1.89	58.34	0.13
	Excavator	73,888	2,280,624	5,028	0.07	2.29	5.05E-03	0.36	11.12	0.02	0.82	25.37	0.06
	RT Forklift	21,596	666,565	1,470	0.37	11.34	0.02	0.10	3.06	6.75E-03	1.22	37.64	0.08
	Generator	11,243	347,029	765.07	0.24	7.29	0.02	0.08	2.36	5.19E-03	0.89	27.43	0.06
	Sideboom	94,055	2,903,074	6,400	0.64	19.63	0.04	0.47	14.37	0.03	1.75	53.90	0.12
	Skid Truck	77,373	2,388,178	5,265	0.05	1.63	3.59E-03	0.28	8.72	0.02	6.73	207.74	0.46
	Tack Rig	74,585	2,302,117	5,075	0.09	2.89	6.38E-03	0.39	12.02	0.03	1.89	58.34	0.13
	Water Truck	77,373	2,388,178	5,265	0.05	1.63	3.59E-03	0.28	8.72	0.02	6.73	207.74	0.46
	Welding Machine	12,003	370,467	816.74	0.25	7.74	0.02	0.05	1.65	3.64E-03	7.84	242.03	0.53
	Welding Truck	77,373	2,388,178	5,265	0.05	1.63	3.59E-03	0.46	14.14	0.03	6.73	207.74	0.46

Denbury Snowy River CO2 Project Emissions
Group 8 Flowline Construction

Activity 5: X Ray										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						8	1	100	6.11	4,889	10.78	0.42	339.12	0.75
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Generator	10.00	4.0	0.33	0.85	10.19				10.10	102.90	0.23	17.23	175.50	0.39
	X-Ray Truck	100.00	4.0	0.33	0.85	10.19				2.80	28.57	0.06	16.14	164.41	0.36

Activity 6: Testing										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						6	1	100	6.11	3,666	8.08	0.42	254.34	0.56
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04
Construction Equipment	Air Compressor/Dryer	400.00	2.0	0.10	0.26	3.09				37.95	117.13	0.26	140.25	432.90	0.95
	RT Forklift	65.00	2.0	0.10	0.26	3.09				12.90	39.80	0.09	95.48	294.72	0.65
	Generator	50.00	2.0	0.10	0.26	3.09				5.34	16.47	0.04	48.26	148.96	0.33

Activity 7: Backfill										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	14,146	31.19	0.42	981.30	2.16
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Blade	260.00	2.0	1.00	2.57	30.87				4.95	152.78	0.34	20.71	639.18	1.41
	Dozer	240.00	2.0	1.00	2.57	30.87				5.30	163.57	0.36	21.66	668.41	1.47
	Excavator	236.00	2.0	1.00	2.57	30.87				4.15	127.95	0.28	18.73	578.19	1.27
	Generator	50.00	1.0	1.00	2.57	30.87				5.34	164.75	0.36	48.26	1,490	3.28
	Roller	145.00	2.0	1.00	2.57	30.87				10.67	329.35	0.73	25.19	777.53	1.71

Activity 8: Corrosion Protection										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						5	1	100	6.11	3,055	6.74	0.42	211.95	0.47
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						4	2	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Air Compressor	85.00	2.0	0.33	0.85	10.19				9.84	100.24	0.22	43.11	439.06	0.97
	Generator	10.00	1.0	0.33	0.85	10.19				10.10	102.90	0.23	17.23	175.50	0.39
	Paint Truck	185.00	2.0	0.33	0.85	10.19				2.80	28.57	0.06	16.14	164.41	0.36

Activity 9: Reclaim										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/mile)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	37,723	83.16	0.42	2,617	5.77
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	1	100	1.65	1,321	2.91	4.58	3,666	8.08
Construction Equipment	Backhoe	110.00	4.0	2.00	5.14	61.73				27.40	1,691	3.73	41.31	2,550	5.62
	Blade	200.00	4.0	2.00	5.14	61.73				4.95	305.57	0.67	20.71	1,278	2.82
	Farm Tractor	190.00	4.0	2.00	5.14	61.73				2.80	173.14	0.38	16.14	996.40	2.20

Denbury Snowy River CO2 Project Emissions
Group 8 Flowline Construction

Activity 5: X Ray		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	134.34	0.30	0.14	110.02	0.24	0.05	38.40	0.08	0.29	233.12	0.51
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Generator	0.98	9.93	0.02	0.95	9.64	0.02	8.91E-03	0.09	2.00E-04	3.45	35.13	0.08
	X-Ray Truck	0.92	9.40	0.02	0.89	9.12	0.02	0.20	2.08	4.58E-03	1.37	13.99	0.03

Activity 6: Testing		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	100.76	0.22	0.14	82.52	0.18	0.05	28.80	0.06	0.29	174.84	0.39
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36
Construction Equipment	Air Compressor/Dryer	6.17	19.06	0.04	5.99	18.49	0.04	0.25	0.78	1.71E-03	8.14	25.13	0.06
	RT Forklift	1.43	4.40	0.01	1.38	4.27	0.01	0.06	0.18	3.98E-04	2.57	7.94	0.02
	Generator	0.40	1.24	2.73E-03	0.39	1.20	2.65E-03	0.03	0.09	2.02E-04	1.77	5.46	0.01

		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	388.75	0.86	0.14	318.37	0.70	0.05	111.12	0.24	0.29	674.57	1.49
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Blade	1.30	40.23	0.09	1.26	39.02	0.09	0.19	5.98	0.01	1.65	50.92	0.11
	Dozer	1.38	42.54	0.09	1.34	41.26	0.09	0.20	6.10	0.01	1.72	53.12	0.12
	Excavator	1.16	35.76	0.08	1.12	34.68	0.08	0.20	6.02	0.01	1.54	47.53	0.10
	Generator	0.40	12.38	0.03	0.39	12.01	0.03	0.03	0.91	2.02E-03	1.77	54.58	0.12
	Roller	2.72	83.94	0.19	2.64	81.42	0.18	0.11	3.48	7.68E-03	1.67	51.52	0.11

Activity 8: Corrosion Protection		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	83.97	0.19	0.14	68.77	0.15	0.05	24.00	0.05	0.29	145.70	0.32
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Air Compressor	1.74	17.71	0.04	1.69	17.18	0.04	0.06	0.60	1.33E-03	1.14	11.63	0.03
	Generator	0.98	9.93	0.02	0.95	9.64	0.02	8.91E-03	0.09	2.00E-04	3.45	35.13	0.08
	Paint Truck	0.92	9.40	0.02	0.89	9.12	0.02	0.20	2.08	4.58E-03	1.37	13.99	0.03

Activity 9: Reclaim		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,037	2.29	0.14	848.99	1.87	0.05	296.31	0.65	0.29	1,799	3.97
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	115.82	0.26	0.09	68.67	0.15	0.01	11.92	0.03	0.41	324.08	0.71
Construction Equipment	Backhoe	6.46	398.87	0.88	6.27	386.91	0.85	0.05	2.96	6.52E-03	6.65	410.62	0.91
	Blade	1.30	80.46	0.18	1.26	78.05	0.17	0.19	11.96	0.03	1.65	101.84	0.22
	Farm Tractor	0.92	56.96	0.13	0.89	55.25	0.12	0.20	12.58	0.03	1.37	84.77	0.19

Denbury Snowy River CO2 Project Emissions
Group 8 Flowline Construction

Activity 5: X Ray		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	149,600	329.81	0.03	22.56	0.05	8.40E-03	6.72	0.01	2.30E-03	1.84	4.06E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Generator	2,422	24,671	54.39	0.30	3.10	6.82E-03	0.02	0.16	3.43E-04	0.89	9.05	0.02
	X-Ray Truck	77,373	788,099	1,737	0.05	0.54	1.19E-03	0.15	1.56	3.43E-03	6.73	68.55	0.15

Activity 6: Testing		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	112,200	247.36	0.03	16.92	0.04	8.40E-03	5.04	0.01	2.30E-03	1.38	3.05E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	86,983	191.76	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Air Compressor/Dryer	88,895	274,382	604.91	0.62	1.92	4.23E-03	0.61	1.88	4.16E-03	0.89	2.74	6.05E-03
	RT Forklift	21,596	66,656	146.95	0.37	1.13	2.50E-03	0.10	0.31	6.75E-04	1.22	3.76	8.30E-03
	Generator	11,243	34,703	76.51	0.24	0.73	1.61E-03	0.08	0.24	5.19E-04	0.89	2.74	6.05E-03

		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	432,892	954.36	0.03	65.28	0.14	8.40E-03	19.45	0.04	2.30E-03	5.33	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Blade	73,223	2,260,083	4,983	0.09	2.72	5.99E-03	0.40	12.25	0.03	0.74	22.74	0.05
	Dozer	74,585	2,302,117	5,075	0.09	2.89	6.38E-03	0.37	11.31	0.02	1.89	58.34	0.13
	Excavator	73,888	2,280,624	5,028	0.07	2.29	5.05E-03	0.36	11.12	0.02	0.82	25.37	0.06
	Generator	11,243	347,029	765.07	0.24	7.29	0.02	0.08	2.36	5.19E-03	0.89	27.43	0.06
	Roller	41,867	1,292,256	2,849	0.13	4.12	0.01	0.22	6.83	0.02	1.19	36.70	0.08

Activity 8: Corrosion Protection		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	93,500	206.13	0.03	14.10	0.03	8.40E-03	4.20	0.01	2.30E-03	1.15	2.54E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Air Compressor	21,856	222,624	490.80	0.10	0.98	2.15E-03	0.13	1.32	2.91E-03	0.89	9.05	0.02
	Generator	2,422	24,671	54.39	0.30	3.10	6.82E-03	0.02	0.16	3.43E-04	0.89	9.05	0.02
	Paint Truck	77,373	788,099	1,737	0.05	0.54	1.19E-03	0.28	2.88	6.34E-03	6.73	68.55	0.15

Activity 9: Reclaim		CO_2			CH_4			N_2O			HAPS		
Construction Phases	Equipment	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,154,380	2,545	0.03	174.08	0.38	8.40E-03	51.85	0.11	2.30E-03	14.22	0.03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	173,965	383.53	0.46	370.72	0.82	2.00E-03	1.60	3.53E-03	3.77E-03	3.02	6.66E-03
Construction Equipment	Backhoe	15,862	979,191	2,159	0.44	27.38	0.06	0.17	10.37	0.02	3.02	186.25	0.41
	Blade	73,223	4,520,167	9,965	0.09	5.44	0.01	0.31	18.85	0.04	0.74	45.48	0.10
	Farm Tractor	77,373	4,776,356	10,530	0.05	3.26	7.19E-03	0.29	17.91	0.04	6.73	415.48	0.92

Denbury Snowy River CO2 Project Emissions
Group 8 Road Maintenance and Construction

New Roads:

Miles —

Activity 1: Road Clear										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						9	1	100	6.11	—	—	0.42	—	—
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						9	2	100	1.65	—	—	4.58	—	—
Construction Equipment	Air Compressor/Dryer				—	—									
	Blade	300.00	3.00	2.00	—	—				4.95	—	—	20.71	—	—
	Dozer	400.00	3.00	2.00	—	—				41.39	—	—	98.38	—	—
	Scraper	400.00	3.00	2.00	—	—				43.35	—	—	102.59	—	—

Activity 2: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	7,333	16.17	0.42	508.68	1.12
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						12	2	100	1.65	3,963	8.74	4.58	10,997	24.24
Construction Equipment	Blade	300.00	2.00	2.00	—	—				4.95	—	—	20.71	—	—
	Dozer	400.00	3.00	2.00	—	—				41.39	—	—	98.38	—	—
	Dump Truck	350.00	4.00	2.00	—	—				7.76	—	—	33.63	—	—
	Scraper	400.00	3.00	2.00	—	—				43.35	—	—	102.59	—	—

Two-Tracks Road Modifications:

Miles 3.36

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						12	1	100	6.11	49,277	108.64	0.42	3,418	7.54
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						8	2	100	1.65	2,642	5.82	4.58	7,331	16.16
Construction Equipment	Blade	300.00	2.00	2.00	6.72	80.64				4.95	399.16	0.88	20.71	1,670	3.68
	Dozer	400.00	3.00	2.00	6.72	80.64				41.39	3,337	7.36	98.38	7,933	17.49
	Dump Truck	350.00	4.00	2.00	6.72	80.64				7.76	625.91	1.38	33.63	2,712	5.98
	Scraper	400.00	3.00	2.00	6.72	80.64				43.35	3,495	7.71	102.59	8,273	18.24

Existing Roads:

Miles 6.68

Activity 1: Road Grading										CO			NO_x		
Construction Phases	Equipment	Size (hp)	No. of Equipment	Duration (days/Acre)	Duration Total (days)	Duration hours	# of personnel	# of Round Trips per acre	Miles per Round Trip	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)	EF (g/mile [Traffic] g/hr [construction equipment])	Emissions (grams)	Emissions (lbs)
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)						2	1	100	6.11	16,328	36.00	0.42	1,133	2.50
	Heavy Duty Truck (Other listed activities)														
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck						2	2	100	1.65	660.44	1.46	4.58	1,833	4.04
Construction Equipment	Blade	300.00	2.00	2.00	13.36	160.32				4.95	793.58	1.75	20.71	3,320	7.32

Denbury Snowy River CO2 Project Emissions
Group 8 Road Maintenance and Construction

New Roads:

Miles —

Activity 1: Road Clear		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	—	—	0.14	—	—	0.05	—	—	0.29	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	—	—	0.09	—	—	0.01	—	—	0.41	—	—
Construction Equipment	Air Compressor/Dryer												
	Blade	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—
	Dozer	7.76	—	—	7.53	—	—	0.37	—	—	7.10	—	—
	Scraper	8.06	—	—	7.81	—	—	0.37	—	—	7.34	—	—

Activity 2: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	201.52	0.44	0.14	165.04	0.36	0.05	57.60	0.13	0.29	349.68	0.77
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	347.45	0.77	0.09	206.02	0.45	0.01	35.76	0.08	0.41	972.24	2.14
Construction Equipment	Blade	1.30	—	—	1.26	—	—	0.19	—	—	1.65	—	—
	Dozer	7.76	—	—	7.53	—	—	0.37	—	—	7.10	—	—
	Dump Truck	2.08	—	—	2.01	—	—	0.35	—	—	2.72	—	—
	Scraper	8.06	—	—	7.81	—	—	0.37	—	—	7.34	—	—

Two-Tracks Road Modifications:

Miles 3.36

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	1,354	2.99	0.14	1,109	2.45	0.05	387.07	0.85	0.29	2,350	5.18
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	231.63	0.51	0.09	137.34	0.30	0.01	23.84	0.05	0.41	648.16	1.43
Construction Equipment	Blade	1.30	105.11	0.23	1.26	101.95	0.22	0.19	15.62	0.03	1.65	133.04	0.29
	Dozer	7.76	626.01	1.38	7.53	607.23	1.34	0.37	29.72	0.07	7.10	572.37	1.26
	Dump Truck	2.08	167.44	0.37	2.01	162.42	0.36	0.35	28.33	0.06	2.72	219.24	0.48
	Scraper	8.06	649.64	1.43	7.81	630.15	1.39	0.37	29.60	0.07	7.34	591.93	1.30

Existing Roads:

Miles 6.68

Activity 1: Road Grading		PM_{10}			$PM_{2.5}$			SO_2			VOC		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	0.17	448.71	0.99	0.14	367.48	0.81	0.05	128.26	0.28	0.29	778.62	1.72
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	0.14	57.91	0.13	0.09	34.34	0.08	0.01	5.96	0.01	0.41	162.04	0.36
Construction Equipment	Blade	1.30	208.96	0.46	1.26	202.69	0.45	0.19	31.06	0.07	1.65	264.49	0.58

Denbury Snowy River CO2 Project Emissions
Group 8 Road Maintenance and Construction

New Roads:

Miles —

Activity 1: Road Clear		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	—	—	0.03	—	—	8.40E-03	—	—	2.30E-03	—	—
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	—	—	0.46	—	—	2.00E-03	—	—	3.77E-03	—	—
Construction Equipment	Air Compressor/Dryer							—	—	—	—	—	—
	Blade	73,223	—	—	0.09	—	—	0.46	—	—	0.74	—	—
	Dozer	134,685	—	—	0.51	—	—	0.61	—	—	1.89	—	—
	Scraper	133,797	—	—	0.53	—	—	0.61	—	—	3.04	—	—

Activity 2: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	224,400	494.72	0.03	33.84	0.07	8.40E-03	10.08	0.02	2.30E-03	2.77	6.10E-03
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	521,896	1,151	0.46	1,112	2.45	2.00E-03	4.80	0.01	3.77E-03	9.06	0.02
Construction Equipment	Blade	73,223	—	—	0.09	—	—	0.46	—	—	0.74	—	—
	Dozer	134,685	—	—	0.51	—	—	0.61	—	—	1.89	—	—
	Dump Truck	132,987	—	—	0.13	—	—	0.53	—	—	6.73	—	—
	Scraper	133,797	—	—	0.53	—	—	0.61	—	—	3.04	—	—

Two-Tracks Road Modifications:

Miles 3.36

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	1,507,968	3,325	0.03	227.40	0.50	8.40E-03	67.74	0.15	2.30E-03	18.58	0.04
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	347,931	767.06	0.46	741.44	1.63	2.00E-03	3.20	7.05E-03	3.77E-03	6.04	0.01
Construction Equipment	Blade	73,223	5,904,702	13,018	0.09	7.10	0.02	0.46	36.93	0.08	0.74	59.41	0.13
	Dozer	134,685	10,861,008	23,944	0.51	41.06	0.09	0.61	49.24	0.11	1.89	152.43	0.34
	Dump Truck	132,987	10,724,032	23,642	0.13	10.43	0.02	0.53	43.09	0.09	6.73	542.75	1.20
	Scraper	133,797	10,789,411	23,787	0.53	42.79	0.09	0.61	49.24	0.11	3.04	245.34	0.54

Existing Roads:

Miles 6.68

Activity 1: Road Grading		CO_2			CH_4			N_2O			HAPS		
Construction Phases	**Equipment**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**	**EF (g/mile [Traffic] g/hr [construction equipment])**	**Emissions (grams)**	**Emissions (lbs)**
Construction Traffic (Deliveries, Inspections, Sales, Trash Hauling, Crew Commute)	Light Duty Truck (Employee Traffic)	187.00	499,664	1,102	0.03	75.35	0.17	8.40E-03	22.44	0.05	2.30E-03	6.16	0.01
	Heavy Duty Truck (Other listed activities)												
Mobilization/Demobilization (moving equipment)	Heavy Duty Truck	217.46	86,983	191.76	0.46	185.36	0.41	2.00E-03	0.80	1.76E-03	3.77E-03	1.51	3.33E-03
Construction Equipment	Blade	73,223	11,739,109	25,880	0.09	14.12	0.03	0.46	73.43	0.16	0.74	118.12	0.26

Denbury Snowy River CO2 Project Emissions
Group 8 Fugitive Dust Emissions from Paved Roads

Summary of Fugitive Emissions

Paved Roads emission factor from AP-42, Section 13.2.1: *Paved Roads* (01/11)

$$E = k(sL)^{0.91}(W)^{1.02}(1-P/(4*365))$$

where:

sL =	0.6	road surface silt loading silt loading (g/m2) [Table 13.2.1-2, for Ubiquitous Baseline, <500]
W_{LDT} =	4	tons [Average vehicle weight]
$W_{Tractor}$ =	25	tons [Average vehicle weight]
k =	0.0022	lb/VMT [Table 13.2.1-1, for PM_{10}]
k =	0.00054	lb/VMT [Table 13.2.1-1, for $PM_{2.5}$]
P =	100	days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.1-2]

1/2 Ton Trucks (light-duty trucks)

$E_{(PM10)}$ =	5.29E-03	lb/VMT
$E_{(PM2.5)}$ =	1.30E-03	lb/VMT
126		Duration of Construction (days)-Well Pad Construction
23		Duration of Construction (days)-Flow/Bulk Line Construction
0		Duration of Construction (days)-Pump Station Construction
10		Duration of Construction (days)-Road Construction (existing and two-track roads)

Tractor Trailers

$E_{(PM10)}$ =	3.43E-02	lb/VMT
$E_{(PM2.5)}$ =	8.43E-03	lb/VMT
2		Equipment Delivery (days) -Well Pad Construction
2		Equipment Delivery (days) -Flow/Bulk Line Construction
0		Equipment Delivery (days) -Pump Station Construction
2		Equipment Delivery (days) -Road Construction (existing and two-track roads)

Project Segment

Equipment Type	Average Vehicle Weight (tons)[a]	Well Pad Construction			Flow/Bulk Line Construction			Pump Station Construction			Road Construction		
		VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]	VMT per day	Quantity	VMT[c]
Light Duty Trucks	4	100	22	277288	100	135	304182	100	25	0	100	12	11448
Tractor Trailers	25	100	21	4200	100	106	21200	100	17	0	100	8	1600
Total VMT				281488			325382			0			13048
a - Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.													
PM10 (tons)				**0.81**			**1.17**			**0.00**			**0.06**
PM2.5 (tons)				**0.20**			**0.29**			**0.00**			**0.01**

Project Totals

Total Paved Road Emissions	
Pollutant	**tons**
PM_{10}	**2.03**
$PM_{2.5}$	**0.50**

[a] *Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity.*

[b] VMT per day are projected based on experience from previous construction projects.

[c] Vehicle Miles Traveled (VMT) are based on the vehicle quantity , project duration, and experience from previous construction projects.

Denbury Snowy River CO2 Project Emissions
Group 8 Fugitive Dust Emissions from Unpaved Roads

Summary of Fugitive Emissions

Unpaved Roads emission factor from AP-42, Section 13.2.2: *Unpaved Roads* (11/06); Equations a1 and 2

$$E = k\,(s/12)^a (W/3)^b \qquad (1a)$$

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight

Table 13.2.2-2 - Constants for Equation 1a

Constant	PM2.5	PM10
k (lb/VMT)	0.15	1.5
a	0.9	0.9
b	0.45	0.45

Surface Silt (s) content based on Table 13.2.2-1 - construction sites

s = 8.50

$$E_{ext} = E\,[(365 - P)/365] \qquad (2)$$

E_{ext} = annual size-specific emisison factor extrapolated for natural mitigation, lb/VMT
E = emisison factor from Equation 1a
P = days [Average number of days with > 0.01 inches of precipitation for southeast Montana, Figure 13.2.2-1

P = 100

Equipment	Construction Duration (days)	Miles per Day	Quantity	Total Vehicle Miles Traveled[a] (VMT)	W: Mean Vehicle Weight (tons)[b]	Emission Factors (lb/VMT)[c]		Emissions (tons)		Controlled Emissions (tons)	
						PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$	PM_{10}	$PM_{2.5}$
Well Pad Construction											
1/2 Ton Trucks	0	100	0	0	14.5	1.622	0.162	0.000	0.000	0.0	0.0
							Total (tons)	**0.000**	**0.000**	**0.0**	**0.0**

(a) VMT per day are projected based on experience from previous construction projects
(b) Weighted average vehicle wt (tons), based on research of typical vehicle weights and rated hauling capacity. Includes commuting vehicles and tractor trailors.
(c) AP 42 Section 13.2.2 Unpaved Roads, dated November 2006, Equations 1a and 2

Denbury Snowy River CO2 Project Emissions
Group 8 Fugitive Dust Emissions from Earthmoving Activities

Construction Activity	Activity Type	Approximate Pipeline Length or Road Length (mi)	Excavation Volume[a] (ft^3)	Temporary Workspace for Construction (acres)[b]
Flowline Injection Well 12 and 13	Pipeline	2.57	244,457	1.87
BLM Two-Track Injection Well 13	Access Roads	2.87	454,608	10.44
BLM Two-Track Injection Well 12	Access Roads	2.5	396,000	9.09
New Road Injection Well 13	Access Roads	0.06	9,504	0.22
New Road Injection Well 12	Access Roads	0.04	6,336	0.15
Injection Well 13 Construction Pad	Well Pad Construction	--	601,128	4.6
Injection Well 12 Construction Pad	Well Pad Construction	--	601,128	4.6

Project Construction Activity Particulate Matter Emissions

Construction Activity	Excavation[a] (tons)	Excavation PM_{10} Emission Factor[c] (lb/ton)	Pipeline Excavation PM_{10} Emissions (tons)	Backfilling[a] (tons)	Backfilling PM_{10} Emission Factor[b] (lb/ton)	Backfilling PM10 Emissions (tpy)	Windblown Dust Area (acre)	PM_{10} Windblown Dust Emission Factor[d,e] (tons/acre)	Windblown Dust PM_{10} Emissions - Uncontrolled (tons)	Total Construction Activity PM_{10} emissions (tons)	Total Controlled Construction Activity PM_{10} emissions[g] (tons)	Total Construction Activity $PM_{2.5}$ emissions[f] (tons)	Total Controlled Construction Activity $PM_{2.5}$ emissions[g] (tons)
Flowline Injection Well 12 and 13	12,223	0.058	0.354	12,223	0.012	0.073	1.9	3.80E-01	0.71	1.139	0.569	0.237	0.118
BLM Two-Track Injection Well 13	22,730	0.058	0.659	22,730	0.012	0.136	10.4	3.80E-01	3.97	4.761	2.381	0.990	0.495
BLM Two-Track Injection Well 12	19,800	0.058	0.574	19,800	0.012	0.119	9.1	3.80E-01	3.45	4.148	2.074	0.863	0.431
New Road Injection Well 13	475	0.058	0.014	475	0.012	0.003	0.2	3.80E-01	0.08	0.100	0.050	0.021	0.010
New Road Injection Well 12	317	0.058	0.009	317	0.012	0.002	0.1	3.80E-01	0.06	0.066	0.033	0.014	0.007
Injection Well 13 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
Injection Well 12 Construction Pad	30,056	0.058	0.872	30,056	0.012	0.180	4.6	3.80E-01	1.75	2.800	1.400	0.582	0.291
									Total	**15.813**	**7.907**	**3.289**	**1.645**

(a) Excavation of well pad sites assumed to be 3 feet deep. Excavation and backfilling assumes pipeline will be 6 ft x 3 ft x approximate length (ft) for the Project component. Excavation for road construction assumes road excavation is 30 ft width x 1 ft deep x approximate road length (ft). Soil density is assumed to be 100 lb/ft^3

(b) Temporary workspace acres for roadways assumed to be 30 ft width x approximate road length (mi).

(c) Excavation and backfilling factors from AP-42, Table 11.9-4 (dated 7/98), assuming 100% of TSP is PM_{10}

(d) Windblown dust factor from AP-42 Table 11.9-4 Uncontroled Particulate Emission Factors for Open Dust Sources

(e) PM_{10} emissions are conservatively assumed to be 100% of TSP.

(f) $PM_{2.5}$ emissions were calculated following the SCAQMD Particulate Matter $PM_{2.5}$ Significance Thresholds and Calculation Methodology (2006). For construction and demolition fugitive dust sources, 20.8% of the PM_{10} would be $PM_{2.5}$

(g) Controls are conservatively assumed to have a 50% reducton factor based on Emission Factors for Paved and Unpaved Roads (1/2015) Utah DEQ

Note: Pipeyards/wareyards are assumed to have negligible particulate emissions because of no construction activities.

Appendix F: BLM Responses to Public Comments

Table F-1
Public Comments and BLM Responses

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
Access			
1	Millbrooke, Anne	Access road construction, according to the Plan of Development, will involve developing existing two-track roads and building new roads, building culverts, and crossing low water. Roads are not a little manner in a proposal covering approximately 110,100 acres (100,600 acres BLM, 8,300 acres State of Montana, 1,200 acres private). The extensive road construction would cause compaction of soil, erosion, sedimentation, and noise pollution during construction and from traffic on the built roads. Even dirt roads that saw no motorized traffic leave permanent scars as illustrated by archaeologists discovering in the Amazon that roads were "the most notable elements of the landscape" where there had been a civilization 2,000 years ago! The source for that is Stephen Rostain et al., "Two Thousand Years of Garden Urbanism in the Upper Amazon," Science, 383/6679 (12 January 2024), 183–189, https://www.science.org/doi/10.1126/science.adi6317/. The proposed road construction and use would severe natural habitats, become barriers for wildlife movement, open the area to traffic and associated air and noise pollution, as well as the shedding of polluting chemicals from vehicle tires, and scar the land (as the wagon ruts from a hundred and fifty years ago still scar Montana lands).	EA Section 1.7.1 discloses that approximately five miles of new access roads (four miles on BLM-administered lands) would be created for the Project. Three miles would be spurs off existing roads that end at wells or pump stations, and two miles would extend along the existing CCA pipeline corridor. Except for a 0.25-mile road that would be graded and graveled for access to the Pump Station North, each new road would be maintained as a two-track. The Project would use approximately 25 miles of existing developed roads (Lone Tree Road, Ridge Road, and Hammond Road) and 27 miles of existing two-tracks. Fourteen miles of the existing developed roads and 25 miles of existing two-tracks are on BLM-administered lands. Existing roads would be maintained in their existing condition; no grading or improvements are proposed. Weed-free mats would be used to facilitate access of construction equipment and drill rigs during wet weather. County road agreements for road maintenance and bonding for surface disturbances for the life of the Project would be in place prior to county road use.
2	Arpan, Robert and Karen	They will have to build good roads to get to all of these wells that they will need to service them. They will have to be graveled so the vehicles can get around because this ground is gumbo and is very difficult to travel on when it gets wet. We wanted to fix some of our roads on BLM and they would not let us because it would tear up the ground beside the road.$_2$	EA Section 1.7.1 discloses that approximately five miles of new access roads (four miles on BLM-administered lands) would be created for the Project. Three miles would be spurs off existing roads that end at wells or pump stations, and two miles would extend along the existing CCA pipeline corridor. Except for a 0.25-mile road that would be graded and graveled for access to the Pump Station North, each new road would be maintained as a two-track. The Project would use approximately 25 miles of existing developed roads (Lone Tree Road, Ridge Road, and Hammond Road) and 27 miles of existing two-tracks. Fourteen miles of the existing developed roads and 25 miles of existing two-tracks are on BLM-administered lands. Existing roads would be maintained in their existing condition; no grading or improvements are proposed. Weed-free mats would be used to facilitate access of construction equipment and drill rigs during wet weather. County road agreements for road maintenance and bonding for surface disturbances for the life of the Project would be in place prior to county road use.
Air Quality and Greenhouse Gas Emissions			
3	Mccutchan Royer, Shantel	Will there be new air quality stations put up?	Air quality stations are not part of the proposed action, and the NEPA analysis has not identified the need for air monitoring or adaptive management. Ambient air monitoring networks and supporting management are typically designed and operated by the state, in this case the MDEQ, with guidance from the EPA. Typically monitors are placed in locations to strategically support human health objectives and are in highly populated areas or areas of particular concern like schools or specific emission sources. More information on the site selection process for state managed monitors can be found on the MDEQ air quality page (https://deq.mt.gov/air/Programs/monitoring) or the EPA website (https://www.epa.gov/air-quality-management-process/managing-air-quality-ambient-air-monitoring#:~:text=Most%20air%20quality%20monitoring%20networks,hospital%2C%20particular%20emissions%20sources). As part of the EPA UIC permit, in accordance with 40 CFR §146.90(h), the EPA UIC Director may require surface air monitoring or soil monitoring to detect movement of carbon dioxide that could endanger a USDW.

[1] Personal Identifiable Information has been withheld for individuals when requested in ePlanning comment submissions.

[2] Refer to the *Acronyms and Abbreviations List* in EA Appendix B for acronym definitions.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
4	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Center for Biological Diversity et al.'s comment letter on the scoping period for this Project discussed that carbon capture operations can result in the emission of harmful air pollutants such as fine particulate matter, ammonia, and hazardous volatile organic compounds. We refer BLM to that scoping letter since that information and the studies we cite remain relevant. Here in the Draft EA, the discussion of the Project's impacts on air quality is greatly lacking and needs to be revised. These concerns remain with the Draft EA. Because there are foreseeable significant impacts on air quality, this revision should happen in an EIS. First, the Draft EA admits that cumulative impacts on air quality are significant, noting that "[t]he modeling from the most conservative emission scenario . . . indicated that cumulative nitrogen deposition could exceed critical loads of nitrogen deposition at some federal and tribal Class I areas." Instead of triggering an EIS, as it should have done, the Draft EA dismisses this impact and makes a broad and unsupported assumption that "mitigation strategies would be implemented to control emissions." The Draft EA fails to cite to these supposed mitigations and assess how they would help with air quality.	EA Section 3.2 describes regional ambient air quality, potential impacts to air resources, and greenhouse gas emissions from the proposed action. Table 3-3 provides estimated emissions for criteria pollutants, HAPs, and GHGs from construction activities for each ROW Group, and Table 3-4 provides estimated emissions for the operational and monitoring periods. Cumulative impacts on air quality in the EA refers to the regional photochemical modeling study conducted by BLM for the 2024 Final MCFO SEIS to assess the potential future year air quality impacts (e.g., criteria pollutants as well as deposition and visibility) from federal coal and gas production and other sources in the intermountain west including Montana and North Dakota. As described in EA Section 3.2, cumulative impacts from all sources included in the circa 2028 modeling are predicted to be below the NAAQS and MAAQS as well as below nitrogen and sulfur deposition critical loads in or near the Project area. A non-exhaustive list of mitigation strategies that would be implemented in regard to the Project are in EA Section 3.2.3 *Emission Reduction Measures*. Denbury revised POD Section 4.5 to clarify that drill rigs will meet EPA Tier 4 emissions standards. This design feature has been added to the list of emission reduction measures in EA Section 3.2.3.
5	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Second, BLM erred by excluding upstream activities from the Draft EA, claiming both that "[u]pstream emissions from the sourcing of CO2 that is being sequestered is beyond the scope of this analysis" and the "type and location of emissions sources for this project are unknown at this time." Neither reason is persuasive nor supported. Regarding the scope of analysis, a recent study, which we submitted with our scoping comments, confirmed that the lifecycle air pollution from CCS on fossil fuel-fired powerplants is significant. Further, as noted in our comment on GHGs above, the carbon storage part of the Snowy River Project would not happen but for the existing upstream gas-fired power plants; the activities are inextricably linked and therefore within the scope of NEPA analysis. The claim that the "type and location of emissions sources for this project are unknown at this time" is simply untrue; during the March 6, 2024 virtual hearing, the Denbury representative said—more than once— that the type and location of emissions sources for this Project are the Shute Creek and Lost Cabin gas plants in Wyoming. Since this information is known BLM must update the air quality section and re-open its analysis to the public. To fail to do otherwise would be arbitrary and capricious.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
6	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Third, BLM should install air monitors to gain an accurate baseline for the Project and to track air quality impacts. BLM admits in the Draft EA that Carter County, where the Project is located, does not have any active air monitoring stations, and the nearest station is almost 40 miles away. Low-cost air quality sensors are commercially available, and BLM offers no explanation for how and why it is not filling this gap of missing information.	Ambient air monitoring networks and supporting management are typically designed and operated by the state, in this case the MDEQ, with guidance from the EPA. Typically monitors are placed in locations to strategically support human health objectives and are in highly populated areas or areas of particular concern like schools or specific emission sources. Usually, MDEQ will only require ambient air monitoring when background concentrations exceed 80% of the NAAQS [40 CFR §58.14(c)(1)]. More information on the site selection process for state managed monitors can be found on the Montana DEQ air quality page (https://deq.mt.gov/air/Programs/monitoring) or the EPA website (https://www.epa.gov/air-quality-management-process/managing-air-quality-ambient-air-monitoring#:~:text=Most%20air%20quality%20monitoring%20networks,hospital%2C%20particular%20emissions%20sources). Low-cost sensors do not meet data accuracy requirements mandated by regulatory agencies to be used in a compliance setting. While low-cost sensors can be useful in identifying trends, the error and uncertainty in the magnitude measurements make it impracticable to use them for compliance with air quality standards or for the BLM to make adaptive management corrective actions. Any emission monitoring and ambient air sampling required for this project would likely be regulated under the EPA UIC permit, in accordance with 40 CFR §146.90(h), as the EPA UIC Director may require surface air monitoring or soil monitoring to detect movement of carbon dioxide that could endanger a USDW. Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities, which may include a Montana Air Quality permit and/or registration for emissions from the Project.
7	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Finally, the Draft EA says that its air quality analysis "was developed based upon a reasonably defined boundary of the Project's direct impacts,"but then fails to say what that defined boundary was. This should be more clearly explained. Appendix E, the Air Quality Analysis and Calculations, names "calculation assumptions and methodology" but says nothing about the "reasonably defined boundary" to assess air impacts. BLM should also provide rationale for why it chose that specific defined boundary, particularly given that different pollutants have varying dispersal traits.	EA Section 3.2.3 has been revised to clarify that the air quality analysis is limited strictly to air quality impacts from construction, drilling, and operational periods that would occur within the affected airshed. Carter County is a designated NAAQS attainment area under the CAA, therefore, the airshed is assumed to be Carter County, MT.

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8	O'Grady, Morgan; Western Environmental Law Center et al.	BLM also failed to analyze the Project's indirect downstream emissions, which is required under NEPA's "hard look." The Draft EA misleadingly characterizes the Project as a "carbon sink," and describes "fugitive losses from pipelines" and any "fugitive leak rates" from the Project's facilities as "operational emissions." These emissions can occur upstream, during transportation from the oilfields to the gas processing facility, as well as from the facility to the Project site. Emissions can also occur downstream, as CO2 leakage from any poorly plugged and orphaned wells in the vicinity is not just possible, but likely. Although the Draft EA quantifies some of these fugitive emissions, it does not adequately analyze all of them, nor does it discuss their impacts. For example, the Draft EA mentions "fugitive emissions" from pipelines, pump stations, wellheads, and underground CO2 storage, but does not discuss the impact these fugitive emissions may have on the climate, nearby landowners, wildlife, or neighboring communities. The Draft EA also fails to discuss the Project's implications for the use of CO2 from these plants for EOR, or analyze ExxonMobil's current long-term contractual obligations to provide CO2 to third parties for EOR. The applicant has publicly stated that CO2 generated at Shute Creek would be prioritized for sale for EOR, before excess is provided to the Project. As with the operations of the two plants themselves, the downstream emissions associated with the continued extraction of oil and gas using EOR is made possible by the Project's economic support for these plants. There is no indication that permanent sequestration will occur absent favorable tax and market conditions; indeed, the history at Shute Creek suggests otherwise. BLM needs to address these eventualities. BLM must adequately analyze cumulative emissions for this Project, inclusive of both upstream and downstream indirect emissions.	The IPCC defines a carbon sink as "any process, activity or mechanism which removes a GHG, an aerosol or a precursor of a GHG from the atmosphere." In this context, the Project meets the definition of a carbon sink as it is being developed as a permanent sequestration site. The Project's development does not include the use of CO2 for EOR activities, nor is it dependent on Exxon's EOR projects or operation of other facilities, including Shute Creek. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. The analysis for the fugitive emissions from the pipeline, wells, and pump stations was conservatively calculated. The operational emissions from the pipelines were assumed to have an annual loss rate of 1.40x10-3 Gigagrams (Gg) per km of pipeline, which is an emission factor established by the IPCC published within the *Guidelines for National Greenhouse Gas Inventories Chapter 5 - Carbon Dioxide Transport Injection and Geological Storage*. Similarly, the assumed 0.5% leak rate over 100 years was published by the NETL's paper *Gate-to Grave Life Cycle Analysis Model of Saline Aquifer Sequestration of Carbon Dioxide*. This paper establishes the leak rate in regards pipeline and storage formations including poorly managed and abandoned legacy wells. These emission factors and assumptions are included in EA Appendix E and are the best available estimates for fugitive loss and leaks for the sequestration of CO2. Denbury would prepare a T&M Plan and a Quality Assurance Plan for EPA review and approval during the UIC Class VI permitting process. The T&M Plan must include installation and use of continuous recording devices to monitor injection pressure, rate, and volume [40 CFR §146.90(b)]. The T&M Plan must be periodically reviewed at a frequency no less than once every 5 years to incorporate monitoring data that has been collected [40 CFR §146.90(j)]. Denbury must provide the EPA with semi-annual reports containing the monthly volume and/or mass of the carbon dioxide stream injected over the reporting period and the volume injected cumulatively over the life of the Project [40 CFR §146.91(a)(5)]. A greenhouse gas emissions analysis is in Section 3.2. Air Resources and Greenhouse Gas Emissions.

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9	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Finally, safety impacts would not come just from major CO2 leaks and blowouts. The Draft EA acknowledges that fugitive emissions will come from "new well pads and from the constructed CO2 pipeline." The Draft EA estimates that the pipeline will leak "0.0014 Gigagrams per kilometer of pipeline," and leakage "from the underground storage formation" will be "0.5 percent over a 100-year monitoring period." Denbury told BLM that these rates "present a very conservative estimate of fugitive CO2 emissions" that could occur. BLM must analyze the foreseeable impacts to health and safety from the expected fugitive CO2 emissions of the Project, as well as incorporate this information about fugitive leaks into its air impacts analysis.	The NAAQS were developed by the EPA to provide public health protection especially for "sensitive" populations such as asthmatics, children, and the elderly from air pollution. Secondary standards provide public welfare protection including environmental welfare such as damage to animals, crops, and vegetation. Carbon dioxide is not regulated under the NAAQS for public health; instead, it is regulated as a GHG for its effects on the climate. Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities, which may include a Montana Air Quality permit and/or registration for emissions from the Project. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

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10	O'Grady, Morgan; Western Environmental Law Center et al.	BLM must include an analysis of the reasonably foreseeable direct and indirect human health impacts resulting from this Project. As discussed above, leaks, or "fugitive emissions," are not adequately analyzed for their contribution to either climate or health impacts.	The analysis for the fugitive emissions from the pipeline, wells, and pump stations was conservatively calculated. The operational emissions from the pipelines were assumed to have an annual loss rate of 1.40x10-3 Gg per km of pipeline, which is an emission factor established by the IPCC published within the *Guidelines for National Greenhouse Gas Inventories Chapter 5 - Carbon Dioxide Transport Injection and Geological Storage*. Using this conservative assumption, the fugitive emissions analysis estimated that across the 40 miles of pipeline, approximately 100 tons of CO2e would be released annually. Similarly, the analysis assumed a 0.5% leak rate over 100 years for the pore space using a factor that was published by the NETL's paper *Gate-to Grave Life Cycle Analysis Model of Saline Aquifer Sequestration of Carbon Dioxide*. This paper established an estimated leak rate for pipeline and storage formations including poorly managed and abandoned legacy wells. The emission factors and assumptions used in the Project's fugitive emissions analysis are included in EA Appendix E. The NAAQS were developed by the EPA to provide public health protection especially for "sensitive" populations such as asthmatics, children, and the elderly from air pollution. Secondary standards provide public welfare protection including environmental welfare such as damage to animals, crops, and vegetation. Carbon dioxide is not regulated under the NAAQS for public health; instead, it is regulated as a GHG for its effects on the climate. Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities, which may include a Montana Air Quality permit and/or registration for emissions from the Project. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
11	O'Grady, Morgan; Western Environmental Law Center et al.	BLM omits an analysis of the time following the 30-year ROW in which the CO2 may—or will, by BLM's estimation—leak into the atmosphere. It is unclear why BLM is specifying a 30-year ROW for "permanent" CO2 injection, or whether BLM is even permitted to grant ROWs in perpetuity.	Table 3-8 footnote "k" has been updated to clarify that the monitoring emissions included in the table represent vehicle emissions to meet EPA Class VI UIC permit monitoring requirements (40 CFR §146.90) and incorporate the fugitive emissions from the geologic pore space on an annual basis for the duration of the monitoring period. ROW grants can be renewed through an application process as long as the holder is in compliance with the terms and conditions of the grant (43 CFR §2807.22). The BLM would review the ROW renewal using current data and land use plan decisions at that time. A ROW holder may request to renew the ROW grants prior to their expiration. EA Section 2.1 has been revised to clarify Denbury's application requested 30-year renewable ROW grants.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
12	Dinstel, Dan	The Environmental Assessment "cherry picks" science and data to support the issuance of a BLM permit. For instance, the air resource analysis uses data from the Broadus recording station. Broadus is in a south westerly direction from the project area when the prevailing winds are from the northwesterly direction. All airport runways in the surrounding area are oriented northwest and southeast to support this claim. PM 2.5 generated by the project will never reach the Broadus recording station. Delay the permit until the FLPMA ruling concerning public land use has been litigated and finalized.	The EA text in Section 3.2.1 properly discloses that the two nearest ambient air monitors to the proposed project are Broadus and Miles City-Pines Hills. Broadus monitor was selected as the best representative monitoring site as the Miles monitor does not have 3 years of verified data. The ambient air data was included to provide representative values that are similar to what would be measured in Carter County. However, the EA does not state that the Broadus meter is used to monitor emissions from the project nor is the inclusion of the Broadus ambient air monitoring data intended to imply that future data recorded by the Broadus monitor would reflect the emissions associated with the project. As stated in the EA, Carter County does not have an active ambient air monitor as the county is designated as a NAAQS attainment area under the CAA. Ambient air monitoring data from the Broadus monitoring site was provided in the text as a representation of what Carter County's ambient air values may be. Both Carter County and Powder River County are designated as NAAQS attainment areas under the CAA. Section 3.2.3 has been updated to clarify the Project is not anticipated to contribute to change of attainment in Carter County.
13	Millbrooke, Anne	I need to read the plan more carefully to understand the applicability of other concerns on my mind, but I call your attention to those concerns: How will this extensive project degrade the public lands' capacity to act as natural sinks for CO2?	The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Table 10-1 of the *BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends* (2023) lists the average carbon sequestration capacity on a per acre basis that occurs on Federal lands for each state. These data are derived from the USGS's *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14* (2018) report on federal emissions and sinks. The average acre of federal land in Montana sequesters -0.69602 metric tons of carbon per year. For the 46 acres of federal land that would be converted to gravel cover and new two-tracks during Project operation, the Project would result in a loss of capacity to naturally sequester approximately 32 metric tons of carbon per year. Over a 20-year injection period, this equates to 640 metric tons of carbon sequestration, which is significantly less than the 150 million metric tons of CO2 that the Project may sequester. At the end of the project's life, these 46 acres would be reclaimed and the lands' capacity to act as a natural carbon sink would be restored.
14	Individual	The small and uncertain benefits of this project do not justify destruction of intact prairies that act as natural carbon sinks. Can you answer the question of how much CO2 this project will sequester versus how much will be naturally sequestered by the natural environment over an extended period of time? Is it really enough to justify the amount of environment, social, and economic disturbance caused by this project?	Air resources and greenhouse gas emissions are discussed in EA Section 3.2. Denbury estimates injecting approximately 150 million tons of CO2 over the course of 20 years. This is equivalent to annual GHG emissions from more than 1.6 million cars. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Table 10-1 of the *BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends* (2023) lists the average carbon sequestration capacity on a per acre basis that occurs on Federal lands for each state. These data are derived from the USGS's *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14* (2018) report on federal emissions and sinks. The average acre of federal land in Montana sequesters -0.69602 metric tons of carbon per year. For the 46 acres of federal land that would be converted to gravel cover and new two-tracks during Project operation, the Project would result in a loss of capacity to naturally sequester approximately 32 metric tons of carbon per year. Over a 20-year injection period, this equates to 640 metric tons of carbon sequestration, which is significantly less than the 150 million metric tons of CO2 that the Project may sequester. At the end of the project's life, these 46 acres would be reclaimed and the lands' capacity to act as a natural carbon sink would be restored.

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15	Individual	Further, if the project does happen, there must be very tight scrutiny and verification of the amount of CO2 sequestered - especially over a company that has not always shown integrity, as when they failed to tell us their own scientists decades ago told them that human caused global warming was real, and instead they joined in hiring a PR firm to say the opposite. With that amount of money at stake, there will be very strong motivation to fudge the numbers.	Denbury would prepare a Testing and Monitoring (T&M)Plan and a Quality Assurance Plan for EPA review and approval during the UIC Class VI permitting process. The T&M Plan must include installation and use of continuous recording devices to monitor injection pressure, rate, and volume [40 CFR §146.90(b)]. The T&M Plan must be periodically reviewed at a frequency no less than once every 5 years to incorporate monitoring data that has been collected [40 CFR §146.90(j)]. Denbury must provide the EPA with semi-annual reports containing the monthly volume and/or mass of the carbon dioxide stream injected over the reporting period and the volume injected cumulatively over the life of the Project [40 CFR §146.91(a)(5)]. Additionally, Denbury must also report to EPA according to the Project's MRV Plan 40 CFR § 98.448), which requires monitoring, reporting and verification to quantify CO2 leakages and volume injected.
16	Carroll, Llane; Harmon Creek Cattle LLC	The outcomes presented in table 3-10 for the Present Value of Estimated SC-GHG Emissions relies on assumptions of global warming being reduced by implementing alternative two. A primary concern is the selection of arbitrary discount rates. When discount rates are set at a low figure, the present value benefits skyrocket. (ie at 5% 1.7 Billion vs 2.5% 9.8 Billion)	Table 3-10 has been removed from the Final EA. Section 1.5 of the EA clarifies that Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), disbanded the Interagency Working Group on the Social Cost of Greenhouse Gases (IWG) and withdrew all related guidance and estimates, including those for the social cost of carbon. While BLM considered this metric in the Draft EA, Section 6(c) of the Executive Order states that the calculation is scientifically flawed, lacks legislative basis, and undermines U.S. competitiveness. As a result, the social cost of carbon is no longer a valid or required consideration in federal permitting decisions.
17	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Center for Biological Diversity et al.'s comment letter on the scoping period for this Project discussed the false promises of CCS, its inability to stand up to being a climate "solution," the high energy penalty of compressing and injecting carbon, and more concerning climate evidence and science. We refer BLM to our scoping comments for that discussion and citations, as that all remains relevant. In the Draft EA at hand, the greenhouse gas (GHG) section contains omissions, unfounded assumptions, and unexplained activities that must be corrected. We urge BLM to take the earlier science and information we provided into account, and to correct the Draft EA's deficiencies. Because there are foreseeable significant GHG impacts, this revision should happen in an EIS. First, BLM must make clear what the role of enhanced oil recovery (EOR) will play in the Project; at present, the Project Description is not clear on this point. During the March 6, 2024 virtual hearing, the representative from Denbury said that the Project's CO2 will be sourced from two gas plants in Wyoming that otherwise would send their CO2 for EOR operations. But the Draft EA does not disclose this fact shared at the hearing, nor does it adequately describe the role of EOR in the whole of the Project. This must be corrected. The public and decisionmakers are meant to be informed by NEPA documents, not left trying to piece together information from the documents and hearings. The Draft EA must also explain whether or not the injected CO2 could be later drawn from the injection wells and utilized for EOR at the Snowy River site or elsewhere. If the CO2 is and/or could foreseeable be used for EOR, then as EPA recommended, the "GHG emissions associated with enhanced oil recovery would be indirect effects of the project." BLM should "quantify the GHG emissions associated with such activities."	Analysis to determine the merits or deficiencies of Carbon Capture, Utilization, and Storage (CCUS) is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The Project does not propose EOR activities. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
18	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Second, the Project will generate substantial GHG emissions. Not only does this trigger an EIS (see earlier in this comment letter), but the NEPA analysis must acknowledge this fact and correct several areas where it obscures the true nature of the Project's climate impacts. For one, the Draft EA estimates that the Project will result in 4,734 tons CO2e from construction and 205 tons/year CO2e from operations, with the "worst-case annual Project CO2e emissions . . . calculated to be 1,695 tons per year." This is a significant amount of climate-harming emissions under either scenario. Looking at the lower end of BLM's estimate, according to EPA's GHG Equivalencies Calculator, 205 tons/year CO2e is the annual equivalent to burning 230,000 pounds of coal. Over the (at least) 20-year lifespan of the Project, 205 tons/year CO2e amounts to burning almost 4.6 million pounds of coal. BLM must make these impacts clear and understandable to the public and rightfully recognize them as triggering an EIS.	As stated in the EA Section 3.2, "Construction GHGs emission would occur due to vehicular emissions from increased traffic from the construction work force, traffic from construction deliveries, and internal combustion engine emissions from construction equipment. Operational GHG emissions are expected to result from personnel commuting and fugitive CO2 losses". There are no regulatory standards or thresholds for GHGs from fugitive or mobile combustion sources. Furthermore, included in the EA Section 3.2, conservative estimates of GHG emissions from the Project are compared to state and USA annual averages. The Project's peak annual emissions would be approximately 0.003% of the state's annual emissions when comparing to historical data. When looking at operational GHGs, this value is even lower. Although the Project would result in GHG emissions associated with equipment and vehicle use during the construction and operation periods, the cumulative GHG emissions is ultimately net negative.

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19	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Third, BLM obfuscates the Project's impacts by its assertions of net negativity, stating: "However, when including the subsequential 150 million tons of CO2 proposed to be injected as a result of this Project would total GHG emissions would be net-negative." There are problems with this claim, and we are concerned it is being used to diminish the Project's climate impacts. First, there are actual emissions occurring—as noted above, enough to amount to burning millions of pounds of coal. These actual emissions are significant enough to stand on their own. Further, the Draft EA fails to acknowledge that the captured CO2 would not be emitted but for the operation of upstream fossil fuel power plants run by Denbury/Exxon, the Project developer. The gas-fired power plants that will generate the CO2 for the Snowy River Project are massive emitters. In a time of climate crisis when the clear, science-supported answer is to rapidly and justly phase out fossil fuels, those gas plants should be shut down. This Project, on the other hand, further entrenches those interests by providing 45Q tax credits to help incentive the gas plants' continued operation, and then makes claims of GHG benefits all for burying some of its (ultimately not necessary) pollution. While BLM does not have the authority over the upstream gas plants, it does have responsibility in the NEPA process to fully disclose and analyze activities and impacts of a Project; this includes providing a full accounting of the entire Project's GHG impacts and avoiding misleading claims about net-negativity.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
20	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Fourth, there is no support for the Draft EA's claim that "Injection wells will not require an additional energy source to operate; the wellhead would operate on induced pressure." What there is evidence for is that compressing and injecting CO2 is highly energy intensive, such that the "energy penalty" of these activities can reduce whatever climate benefit is claimed by 25%. Even the Draft EA seems to later acknowledge that simple induced pressure is not enough, as it explains how "Two electric pump stations would be constructed and operated as a part of the Project. This analysis does not analyze emissions associated with the purchase of electricity for the operation of these stations (scope 2 emissions)." BLM must not exclude the emissions and energy cost of compressing and pumping CO2, as this is foreseeably significant.	As noted in EA Section 3.2, scope 2 emissions were excluded from the analysis. BLM recognizes that the upstream energy that would supply electricity to the pump stations could be sourced from fossil-fuel fired electric utility generating units; however, it would not be appropriate to speculate on where the electricity would be generated or the emissions associated with electrical generation. Additionally, evolving regulations such as the EPA's Final Rule published April 25, 2024 on NSPS GHG Emissions from New, Modified, and Reconstructed Fossil Fuel-Fired EGUs may affect GHG emissions for electric service providers.
21	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Finally, we appreciate that BLM included a discussion of the Social Cost of Greenhouse Gases (SC-GHG). EPA recommended, however, that BLM "give specific information regarding the social estimate related to individual gases." BLM did not take up this recommendation in the Draft EA and did not explain why. Further, there appears to be an error in the Draft EA when describing Table 3-10, which presents "Present Value of Estimated SC-GHG for GHG Emissions Associated with the Proposed Project over a 30-year lifespan." The narrative text says Table 3-10 depicts the SCGHG "for the build scenario, where it is assumed that the proposed Project moves forward. For comparison, the SC-GHG is presented for the Project independently and then with the CO2 sequestration incorporated." The table, however, (pictured below) shows only the build scenario. BLM should correct this and depict, for comparison, the Project without CO2 sequestration.	Table 3-10 has been removed from the Final EA. Section 1.5 of the EA clarifies that Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), disbanded the Interagency Working Group on the Social Cost of Greenhouse Gases (IWG) and withdrew all related guidance and estimates, including those for the social cost of carbon. While BLM considered this metric in the Draft EA, Section 6(c) of the Executive Order states that the calculation is scientifically flawed, lacks legislative basis, and undermines U.S. competitiveness. As a result, the social cost of carbon is no longer a valid or required consideration in federal permitting decisions.
22	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Finally, the SC-GHG does not incorporate upstream emissions. Failure to depict upstream emissions obscures the nature and impacts of the Project as a whole and prevents the public and decisionmakers from understanding the significance of the GHG emissions of all Project activities. Afterall, the CO2 comes from somewhere (and here, it is gas-fired power plants), meaning, there is no Snowy River sequestration hub without the upstream activities.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

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23	O'Grady, Morgan; Western Environmental Law Center et al.	An area of major concern for Conservation Groups is BLM's inability to state with certainty whether the net carbon reduction benefits of the Project will exceed the greenhouse gas ("GHG") emissions resultant from both the Project's construction and its ancillary effects of prolonging oil and gas production through use of carbon dioxide for enhanced oil recovery. This concern is not unfounded: ExxonMobil's Shute Creek Carbon Capture Utilization and Storage ("CCUS") facility—one of the world's longest-running and largest such facilities—has never in its 35-year history reached its nominal CO2 capture capacity and has only sequestered around 3% of total CO2 emissions. This Project not only runs the same risk, but appears, based on the limited information available in the Draft EA, to have an ancillary effect of prolonging Shute Creek's operational lifespan, raising very real concerns that there will be no net climate benefit from a Project being billed as climate-positive, and from which the proponents will achieve substantial tax benefits—tax benefits that were intended to support technology and development to support meaningful action to address the climate crisis. The science is clear that continued reliance on fossil-fuel-based energy sources is inconsistent with a livable climate. A project that is supposed to help address the climate crisis should not promote continued fossil-fuel production and should be clearly explained to the public so that there is no confusion about whether or not it will have a net benefit to climate. Moreover, the very real concerns of landowners in the Project area about surface and underground impacts need to be more fully addressed, and potential mitigation for such effects clearly explained.	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The Project does not propose EOR activities. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
24	O'Grady, Morgan; Western Environmental Law Center et al.	BLM failed to complete a comprehensive cumulative impacts analysis for the proposed Project, including an assessment of the upstream and downstream indirect emissions that appear likely to result if it is completed. Although BLM improperly omitted the source of the CO2 for the Project in its analysis, the applicant has indicated that the CO2 will be sourced from the Shute Creek and Lost Cabin gas processing plants. This Project would therefore extend the lives of these two gas processing plants and related enhanced oil recovery operations ("EOR"), prolonging the emission of greenhouse gases during both processing and downstream combustion of fossil gas. Additionally, the Project would result in leaked gases during transportation. Thus, despite the BLM's claims of carbon net-negativity, this Project does nothing to mitigate climate change, and may well exacerbate it. BLM's omission of the CO2 sources makes it impossible for the public (and presumably also the agency) to know whether there will be a long-term net reduction or increase in GHG emissions; without this information BLM cannot fulfill NEPA's core purposes of understanding the consequences of the action before committing to it, and informing the public of those consequences. Sourcing carbon dioxide from the Shute Creek gas processing facility will result in significant upstream and cumulative emissions, which were not analyzed in the Draft EA. BLM must analyze these cumulative emissions to complete the requisite "hard look" required by NEPA. Shute Creek, a facility designed to include carbon capture technology, has only reached its capturing capacity target—roughly 75% of total CO2 emissions—a handful of times during its multi-decade history. Additionally, over the 20-year operational lifetime of the Project, Shute Creek will have processed approximately 180 MT of CO2 that would otherwise remain geologically sequestered if not for Exxon's operation of the Shute Creek facility. This figure exceeds the Project's stated storage capacity, and does not factor in any upstream emissions from other sources of CO2. The Draft EA's claim that the Project would be "net-negative" is therefore not only unsubstantiated; it appears to be incorrect. BLM must account for all sources of CO2 intended for use in this Project and analyze the associated upstream and cumulative emissions to verify its claim that the Project will result in "net negative" emissions.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. The 'leaked gases during transportation" are included in the impacts analysis, as disclosed in Table 3-6 under the row heading "Pipeline", which includes fugitive emissions (leaking) as well as mobile combustion for the required monitoring efforts. The total amount of GHGs generated during the proposed Project is approximately 0.003% of the historical state-wide emissions according to EPA GHG inventory data.

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25	O'Grady, Morgan; Western Environmental Law Center et al.	Similarly, BLM must account for the foreseeable scenario in which the Shute Creek gas processing facility returns to a practice of venting excess CO2 rather than sequestering it. If the Project became uneconomic after 12 years of 45Q tax credits, Shute Creek could return to venting CO2, rather than transporting it for storage at the Snowy River sequestration site. As Denbury is a subsidiary of ExxonMobil, it is unlikely there would be contractual obligations for continued use of the pipeline supported by this right-of-way ("ROW"). ExxonMobil has historically demonstrated similar profit-seeking behavior, making this scenario foreseeable, especially as there is no requirement that CO2 be sequestered once the Project is operational. If CO2 is diverted from the Project to oil and gas fields for EOR, less CO2 would be geologically sequestered, and more oil and gas would be produced, leading to greater emissions.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
26	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Third, EPA recommended that EAs for carbon sequestration projects comprehensively study a project's impact on climate change and its overall GHG emissions, including "GHG emissions associated with enhanced oil recovery [that] would be indirect effects of the project." EPA stated that "if the Project may facilitate enhanced oil recovery activities … GHG emissions associated with enhanced oil recovery would be indirect effects of the project, and we recommend also quantifying the GHG emissions associated with such activities." The Draft EA ignores these recommendations. While the "Summary of Proposed Project," does make it clear that the proposed CO2 pipeline would be linked with the "CCA Enhanced Oil Recovery unit development in Fallon County," the Draft EA does not factor in the indirect emissions of GHG that might result from facilitated EOR into their consideration of the climate impacts of the project. While the Draft EA adopts EPA's recommendation to consider the social cost of GHGs, BLM only considers the GHGs which would be emitted by the project itself and not those that would come from the power plant or the linked EOR.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
27	Lingle, Drew	Construction of the project would complete an essential step for the permanent sequestration of 150 million metric tons of CO2 over 20 years. The equivalent emissions of all domestic flights flown in the United States in 2019. Carbon capture and sequestration (CCS) was heavily incentivized through the Inflation Reduction Act which increased the federal 45Q tax credit for CO2 sequestration to $85/metric ton CO2. This legislation, as well as other bipartisan efforts to increase the credit, shows Congressional intent for federal agencies to support the development of CCS technologies. The Proposed Action Alternative would align with this intent and allow the local communities to reap the benefits of increased employment.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.
28	DiMarco, Jerry	However, this project should be rejected because CO2 sequestration is not a sustainable activity because of the cost of building and maintaining all of the infrastructure associated with it, the impacts on the affected environment and the costs of mitigating those impacts, and the energy required for building, operating and decommissioning the facility. I have read from multiple sources that carbon sequestration is not a net zero process. In the end they emit more CO2 into the atmosphere than they can capture. If that is the case, why should we even consider CO2 sequestration? It is a lot of money and time and resources spent for no gain. BLM should not even consider this project unless the question of net zero has been independently verified.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.

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29	Catherin-Sauer, Augusta; Northern Plains Resource Council	The Project will generate substantial GHG emissions. For one, the Draft EA estimates that the Project will result in 4,734 tons CO2e from construction and 205 tons/year CO2e from operations, with the "worst-case annual Project CO2e emissions . . . calculated to be 1,695 tons per year." This is a significant amount of climate-harming emissions under either scenario. Looking at the lower end of BLM's estimate, according to EPA's GHG Equivalencies Calculator, 205 tons/year CO2e is the annual equivalent to burning 230,000 pounds of coal. Over the (at least) 20-year lifespan of the Project, 205 tons/year CO2e amounts to burning almost 4.6 million pounds of coal. BLM states: "when including the subsequential 150 million tons of CO2 proposed to be injected as a result of this project, total GHG emissions would be net-negative." There are problems with this claim, and we are concerned it is being used to diminish the Project's climate impacts. First, there are actual emissions occurring—as noted, enough to amount to burning millions of pounds of coal. These actual emissions are significant enough to stand on their own. Further, the Draft EA fails to acknowledge that the captured CO2 would not be emitted but for the operation of upstream fossil fuel power plants run by Denbury/Exxon, the Project developer. A life cycle analysis would allow us to better understand the climate impacts of this project with BLM's stated goals of "combatting the climate crisis."	As stated in the EA Section 3.2, "Construction GHGs emission would occur due to vehicular emissions from increased traffic from the construction work force, traffic from construction deliveries, and internal combustion engine emissions from construction equipment. Operational GHG emissions are expected to result from personnel commuting and fugitive CO2 losses". There are no regulatory standards or thresholds for GHGs from fugitive or mobile combustion sources. Furthermore, included in the EA Section 3.2, conservative estimates of GHG emissions from the Project are compared to state and USA annual averages. The Project's peak annual emissions would be approximately 0.003% of the state's annual emissions when comparing to historical data. When looking at operational GHGs, this value is even lower. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

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30	Catherin-Sauer, Augusta; Northern Plains Resource Council	Comment letters on the scoping period for this Project discussed that carbon capture operations can result in the emission of harmful air pollutants such as fine particulate matter, ammonia, and hazardous volatile organic compounds. Here in the Draft EA, the discussion of the Project's impacts on air quality is greatly lacking and needs to be revised. The Draft EA admits that cumulative impacts on air quality are significant, noting that "[t]he modeling from the most conservative emission scenario . . . indicated that cumulative nitrogen deposition could exceed critical loads." Instead of triggering an EIS, as it should have done, the Draft EA dismisses this impact and makes a broad and unsupported assumption that "mitigation strategies would be implemented to control emissions." BLM should install air monitors to gain an accurate baseline for the Project and to track air quality impacts. BLM admits in the Draft EA that Carter County, where the Project is located, does not have any active air monitoring stations, and the nearest station is almost 40 miles away. Low-cost air quality sensors are commercially available, and BLM offers no explanation for how and why it is not filling this gap of missing information.	Any existing or future carbon capture and processing plants that purify CO2 are independent of this Project. As such, they would be subject to regulatory requirements of the EPA and/or states in which they are located, to ensure emissions do not exceed or violate any state or federal air quality standards under the CAA. EA Section 3.2 describes regional ambient air quality, potential impacts to air resources, and greenhouse gas emissions from the proposed action. Table 3-3 provides estimated emissions for criteria pollutants, HAPs, and GHGs from construction activities for each ROW Group, and Table 3-4 provides estimated emissions for the operational and monitoring periods. Cumulative impacts on air quality in the EA refers to the regional photochemical modeling study conducted by BLM for the 2024 Final MCFO SEIS to assess the potential future year air quality impacts (e.g., criteria pollutants as well as deposition and visibility) from federal coal and gas production and other sources in the intermountain west including Montana and North Dakota. As described in EA Section 3.2, cumulative impacts from all sources included in the circa 2028 modeling are predicted to be below the NAAQS and MAAQS as well as below nitrogen and sulfur deposition critical loads in or near the Project area. A non-exhaustive list of mitigation strategies that would be implemented in regard to the Project are in EA Section 3.2.3 *Emission Reduction Measures*. Denbury revised POD Section 4.5 to clarify that drill rigs will meet EPA Tier 4 emissions standards. This design feature has been added to the list of emission reduction measures in EA Section 3.2.3. Ambient air monitoring networks and supporting management are typically designed and operated by the state, in this case the MDEQ, with guidance from the EPA. Typically monitors are placed in locations to strategically support human health objectives and are in highly populated areas or areas of particular concern like schools or specific emission sources. Ambient air monitoring is usually needed only when background concentrations exceed 80% of the NAAQS [40 CFR §58.14(c)(1)]. More information on the site selection process for state managed monitors can be found on the EPA website or the Montana DEQ air quality page: https://deq.mt.gov/air/Programs/monitoring) or the EPA website (https://www.epa.gov/air-quality-management-process/managing-air-quality-ambient-air-monitoring#:~:text=Most%20air%20quality%20monitoring%20networks,hospital%2C%20particular%20emissions%20sources). Low-cost sensors do not meet data accuracy requirements mandated by regulatory agencies to be used in a compliance setting. While low-cost sensors can be useful in identifying trends, the error and uncertainty in the magnitude measurements make it impracticable to use them for compliance with air quality standards or for the BLM to make adaptive management corrective actions. Any emission monitoring and ambient air sampling required for this project would likely be regulated under the EPA UIC permit, in accordance with 40 CFR §146.90(h), as the EPA UIC Director may require surface air monitoring or soil monitoring to detect movement of carbon dioxide that could endanger a USDW.

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31	Buchowiski, Jeffrey	I agree with the EA that impacts from GHG's are long lasting and cumulative. (page 22) I also agree that GHG's cause climate change. (page 29) I disagree with the conclusion that this project will reduce GHG impacts, result in net-negative emissions and be cost effective. Alt 2 predicts "potential" to be neutral but there are no guarantees. In fact, I reviewed several projects in operation and I could find none that fulfilled this promise. A recent Department of Energy analysis says a similar project, Project Tundra in North Dakota, says this carbon capture project would emit more GHG's than it stores. (Energy and Policy Institute, Sep 14, 2023) I realize my comments should technically be focused on this initial EA limited to the ROW, but any discussion should also look at the future impacts of full development. A major concern is the use of captured carbon being used for enhanced oil recovery (EOR). Most estimates of EOR show that one ton of CO2 produces three additional barrels of oil from a depleted field. Let's do the math. Burning one barrel of oil produces 0.5 tons of CO2. Three barrels of oil produces 1.5 tons of CO2. We would be better off leaving that oil in the ground. Why should we be spending money on a process that actually makes CO2 in the atmosphere worse?	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The Project does not propose EOR activities. EA Section 1.1 describes that the Project would transport CO2 using the existing CCA Pipeline, which currently transports CO2 from the Bell Creek Oilfield in Powder River County, Montana, to the CCA EOR unit development in Fallon County, Montana. Although Denbury has existing agreements with emitters that currently transport CO2 in the CCA Pipeline, those agreements are specifically for EOR development in Fallon County. Separate agreements would be secured for the permanent sequestration of CO2 within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
32	Hunkins, Sarah; Western Organization of Resource Councils	Carbon capture operations can result in the emission of harmful air pollutants such as fine particulate matter, ammonia, and hazardous volatile organic compounds.	EA Section 3.2 describes regional ambient air quality, potential impacts to air resources, and greenhouse gas emissions from the proposed action. Table 3-3 provides estimated emissions for criteria pollutants, HAPs, and GHGs from construction activities for each ROW Group, and Table 3-4 provides estimated emissions for the operational and monitoring periods.
33	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	As we established in our initial comment letter, BLM violates this approach in several ways. For one, the Project will generate substantial GHG emissions. The Draft EA estimates that the Project will result in 4,734 tons CO2e from construction and 205 tons/year CO2e from operations, with the "worst-case annual Project CO2e emissions . . . calculated to be 1,695 tons per year." Increased GHG emissions impact people and the environment on a local, regional, national, and global scale. Nonetheless, BLM improperly obscured the Project's GHG impacts with assertions of net negativity, stating: "However, when including the subsequential 150 million tons of CO2 proposed to be injected as a result of this Project would total GHG emissions would be net-negative." BLM's analysis stopped there, and that is improper.	As stated in the EA Section 3.2, "Construction GHGs emission would occur due to vehicular emissions from increased traffic from the construction work force, traffic from construction deliveries, and internal combustion engine emissions from construction equipment. Operational GHG emissions are expected to result from personnel commuting and fugitive CO2 losses". There are no regulatory standards or thresholds for GHGs from fugitive or mobile combustion sources. Furthermore, included in the EA Section 3.2, conservative estimates of GHG emissions from the Project are compared to state and USA annual averages. The Project's peak annual emissions would be approximately 0.003% of the state's annual emissions when comparing to historical data. When looking at operational GHGs, this value is even lower.

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34	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	In another example, the Draft EA admits that cumulative impacts on air quality will be significant. BLM then dismisses this effect and makes a broad and unsupported claim that "mitigation strategies would be implemented to control emissions." Not only does BLM fail to cite to these supposed mitigations and assess how they would help with air quality, but any significant adverse effect requires an EIS.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the preliminary EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. EA Section 3.2 describes regional ambient air quality, potential impacts to air resources, and greenhouse gas emissions from the proposed action. Table 3-3 provides estimated emissions for criteria pollutants, HAPs, and GHGs from construction activities for each ROW Group, and Table 3-4 provides estimated emissions for the operational and monitoring periods. Cumulative impacts on air quality in the EA refers to the regional photochemical modeling study conducted by BLM for the 2024 Final MCFO SEIS to assess the potential future year air quality impacts (e.g., criteria pollutants as well as deposition and visibility) from federal coal and gas production and other sources in the intermountain west including Montana and North Dakota. As described in EA Section 3.2, cumulative impacts from all sources included in the circa 2028 modeling are predicted to be below the NAAQS and MAAQS as well as below nitrogen and sulfur deposition critical loads in or near the Project area. A non-exhaustive list of mitigation strategies that would be implemented in regard to the Project are in EA Section 3.2.3 *Emission Reduction Measures*. Denbury revised POD Section 4.5 to clarify that drill rigs would meet EPA Tier 4 emissions standards. This design feature has been added to the list of emission reduction measures in EA Section 3.2.3.

35	Axelrod, Joshua; Natural Resources Defense Council	The beneficial premise of the Snowy River Project is that it will support domestic and global decarbonization goals by injecting CO2 for permanent geologic storage in a saline formation located more than one mile underground. However, the content of the Draft EA contains almost no information from which this premise can be tested. Instead, the BLM has done the bare minimum to essentially conclude that the Project' greenhouse gas emissions are equivalent to the CO2 to be injected for storage minus the sum of construction and operation emissions. This is woefully inadequate—and obscures potentially significant connected environmental effects—and requires deep and thorough analysis in an EIS. The need for this deeper analysis is discussed below. First, the source of the CO2 to be injected at the Snowy River Project is not disclosed in either the Draft EA or the POD. This is a major oversight, as the presumed source(s) of the CO2 may significantly alter the BLM's "climate change" analysis in the Draft EA. At a threshold level, for the validity of the "Net Greenhouse Gas Emissions" figures presented in Table 3-8 to be assessed, the project proponent should be required to confirm that it has access to a source of captured CO2 that is at least equivalent to the volumes it plans to inject. If this is not the case, then the project timeline and/or the project's overall cumulative greenhouse gas impact cannot match the impact analyzed in the Draft EA. The only information stakeholders currently have to judge the analytical finding regarding cumulative greenhouse gases presented in the Draft EA is the statement that the Project will "inject CO2 from the existing [ExxonMobil] Cedar Creek Anticline (CCA) Pipeline, which is a 105-mile pipeline transporting CO2 from the Bell Creek Oilfield in Powder River County, Montana, to the CCA Enhanced Oil Recovery unit development in Fallon County, Montana." Despite the suggestion of that statement, the CO2 does not come from the Bell Creek Oilfield, but is instead transported to that point via another ExxonMobil (which has acquired Denbury during this project's regulatory review) CO2 pipeline that is currently used to transport CO2 north from Wyoming for use in the Bell Creek and Cedar Creek Anticline Area enhanced oil recovery (EOR) fields operated by ExxonMobil. A simple review of the ExxonMobil CO2 pipeline infrastructure in the area—as well as the CO2 capture infrastructure in the area—reveals that there are very limited potential sources of captured CO2 that could feed the Snowy River Project injection site. The most likely source is the ExxonMobil-owned Shute Creek gas processing facility, which is the country's second largest operating carbon capture facility and is undergoing an upgrade that will increase its CO2 capture capacity from 7 million to 8.2 million tons per year. Nearby, and connected to ExxonMobil's CCA Pipeline, ConocoPhillips' Lost Cabin gas processing facility has a capture capacity of 0.9 million tons of CO2 per year that could technically be sent for storage at the Project. Aside from these two facilities, an alternative source of CO2 for this project could be the regions' EOR fields, where previously injected CO2 could feasibly be extracted and reinjected in this project. This possibility, especially, would significantly alter the cumulative greenhouse gas analysis presented within the Draft EA. The need for this information within the context of an EIS is further clarified when considering the Draft EA's position on the Snowy River Project's contribution to national climate goals. The Draft EA states: Consistent with EO 14008, [. . .] the United States has established an economy-wide target of reducing its net GHG emissions [. . .] by 50 percent to 52 percent below 2005 levels in 2030 . . . . The sequestration of CO2 from the proposed Project, a GHG sink, would help achieve this national level goal. This view of the project's benefits ignores the reality that the emissions this project would inject for storage are some of the most easily prevented of all current global greenhouse gas emissions. But for ExxonMobil's and ConocoPhillips' choices to develop low quality methane resources where the extracted gas is composed of at least 65 percent CO2, the emissions this project would sequester would simply not exist. In other words, the pollution this project seeks to mitigate does not originate from a potentially beneficial use of fossil fuels like electricity generation but is solely waste generated during the production of a resource slated for combustion and subsequent unabated greenhouse gas emissions elsewhere. At its best, this project receives naturally sequestered CO2 that is extracted from the earth, separated via an energy-intensive chemical process, transported a few hundred miles, and then injected back underground in another state. The BLM's failure to disclose the source of the injected CO2 is also a reason the Draft EA's analysis of greenhouse gas emissions does not stand up to basic scrutiny. At the outset, this failure means that the agency's consideration of a "no action" alternative is deeply flawed, as "no action" would presumably mean one of at least three future scenarios	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the preliminary EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.

See Previous Page	*See Previous Page*	should have been explored. In the first, ExxonMobil and ConocoPhillips continue to use the CO2 captured by these two facilities for their existing EOR projects in Wyoming and Montana and contemplate further use in other EOR-candidate oil fields throughout the region and into North Dakota. Under this scenario, some volume of CO2 (and possibly all that the Snowy River Project could hold) would be injected underground, but because that injection would facilitate production of oil, the cumulative greenhouse gas benefits could either be significantly reduced or become essentially a wash. In a second possible outcome under a "no action" scenario, large quantities of CO2 that could be captured by these two facilities are instead vented due to lack of either storage space at a project like Snowy River, carbon capture facility operation costs that are too high to justify without access to CO2 storage tax credits, or lack of demand in connected EOR oil fields. Finally, a third possible outcome worthy of analysis in an EIS involves an examination of the economic incentives driving production of this low quality, sour gas and whether that production—and thus the CO2 to be sequestered by the Project—is vulnerable to regulatory changes (such as limits on CO2 emissions from certain industrial facilities or the end of tax credits for CO2 sequestration) or other external pressures that make high lifecycle emissions methane unmarketable. Such analysis would examine the likelihood—or not—that the Shute Creek and Lost Cabin processing facilities wind down operations and the captured or vented CO2 produced by those facilities remains underground and neither contributes to atmospheric greenhouse gas concentrations nor needs capture and injection underground. The BLM has failed to analyze the greenhouse gas ramifications of any of these reasonably foreseeable outcomes. From this point, the BLM's analysis again falls short because it fails to consider the connected and easily foreseeable greenhouse gas emissions associated with permitting the Snowy River Project. This is because the Shute Creek and Lost Cabin facilities and the products they deliver are, in an emission constrained world, dependent on their owners' ability to market the products as having relatively low lifecycle emissions. In turn, maintaining that marketability through disposal of excess emissions in a project like Snowy River may prolong the lifespan of the Shute Creek and Lost Cabin facilities which are—unlike coal or gas powerplants—not capturing process emissions, but rather are removing CO2 present in the gas being extracted from each company's gas wells. This means all downstream emissions associated with burning the methane produced by these facilities will continue to enter the atmosphere, regardless of what happens to the CO2 injected at the Project. At the same time, an EIS would facilitate the BLM's understanding of upstream emission effects of granting or denying permits for this project. A key, and deeply complex, question that remains unanswered is the extent to which permitting the Project would stop ExxonMobil and ConocoPhillips from simply venting a portion or all their potentially captured CO2 into the atmosphere. Presumably, the value of the CO2 in EOR operations and the value of federal incentives are such that this is an unlikely outcome, though some research of the Shute Creek processing facility suggests that historically ExxonMobil (and Denbury previously) vented large portions of potentially captured CO2 instead of maximizing the plant's CO2 capture capacity. Thus, an EIS is once again appropriate to determine to what extent possible greenhouse gas benefits of the Project are affected due to operational decisions upstream and lifecycle emissions of the gas burned downstream. Finally, because the CO2 that the Project would likely inject is currently being used in EOR projects throughout the region (and there is only evidence that one capture facility in the region is completing a relatively small upgrade in the near term), deeper analysis is needed to scrutinize the proponent's claims about the volume, lifespan, and potential cumulative greenhouse gas benefits of the Project. This is because existing tax credits available to ExxonMobil suggest that the true reason for proposing the Snowy River Project is not to maximize secure, geologic sequestration of CO2, but rather to increase ExxonMobil profits through enhanced flexibility and access to more valuable federal tax credits. Permitting the Project would mean that ExxonMobil could take a variety of courses, all of which would have a meaningful impact on the cumulative greenhouse gas emissions of the Project. First, permitting of the Project could bestow ExxonMobil with significantly enhanced operational flexibility of its Shute Creek carbon capture facility and the pipelines that currently move that CO2 to EOR oil fields. While the company currently only has the option to use its captured CO2 for EOR or vent that CO2 into the atmosphere, this project would allow it to choose various final destinations for the CO2 to maximize profits as opposed to maximizing climate benefits. With this added flexibility, ExxonMobil would then be able to choose to use available captured CO2 for EOR	*See Previous Page*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
See Previous Page	*See Previous Page*	when oil prices are high. This would allow the company to capture increased profits due to favorable oil markets and increase those profits further by also accessing the 45Q tax credit available for CO2 injected as part of an EOR operation. Second, when oil markets are not favorable, the Project would allow the company to divert captured CO2 away from its (and others') EOR operations and instead maximize injection in permanent storage at the Project and thus access the more valuable 45Q tax credit available for secure geologic storage. While ExxonMobil's business motivations for proposing this project may be outside the scope of the BLM's analysis, they nonetheless have a profound impact on the actual operation of the Project. This is because—based on information available in the Draft EA—the active period of CO2 injection will only be limited to the timescale presented if the rate of injection is maximized during every year of the Project's operation. This is only possible if ExxonMobil and ConocoPhillips plan to divert nearly all their available captured CO2 for injection at Snowy River. If, however, the real purpose of this project is business flexibility, it is not valid to assume that injection will take place at the rates presented in the Draft EA. This has two effects on the analysis the BLM has done: it means the project's operating horizon may be much longer than 30 years and that the presumed cumulative emissions may be quite different than presented. This is the sort of information and analysis the BLM must provide in a full EIS to truly understand this project's impacts.	*See Previous Page*
36	Gleason, Carolyn; US EPA Region 8	The EA includes air quality as a resource taken forward for detailed analysis. We appreciate the inclusion of both existing air quality and air quality related values (AQRVs), and environmental consequences associated with emissions from the construction and operation of the Project. We also appreciate the additional emissions inventory calculation information provided in Appendix E. Pages 36 and 37 of the EA indicate that, "The proposed action construction and operations would include, among other options, implementation of the following measures to control emissions: meeting or exceeding applicable industry standards and regulatory requirements, including the 2015 MCFO RMP BMPs during construction, drilling, operation, and maintenance stages. Construction BMPs and mitigation are discussed in further detail in the POD." One important Best Management Practice (BMP) from the Miles City Resource Management Plan (RMP) that is not captured in the EA or POD involves reducing impacts during drilling. Since the Project proposes the drilling of 15 wells to sequester CO2, the impacts and mitigation associated with drilling activities from the Miles City RMP are applicable to this action. The Miles City RMP establishes the requirement that, "Diesel drill rig engines greater than 200 horsepower will meet Tier 4 emission standards for non-road diesel engines. Alternatively, oil and gas operators may use drill rig engines that exceed Tier 4 emission standards if modeling or monitoring at the project level or at a programmatic level demonstrates compliance with the NAAQS and protection of AQRVs." This BMP was in response to modeled near-field air quality impacts that exceeded National Ambient Air Quality Standards (NAAQS). Appendix D of the EA, Sound Level Contours, identifies residences that are proximal to the injection wellfield that may be impacted by air pollutant emissions during well drilling. Therefore, the requirement to use Tier 4 generator set drill rig engines is important, absent additional information specified in the above mitigation measure set forth by the Miles City Air Resource Management Plan: Adaptive Management Strategy for Oil and Gas Resources.	Denbury revised POD Section 4.5 to clarify that drill rigs will meet EPA Tier 4 emissions standards. This design feature has been added to the list of emission reduction measures in EA Section 3.2.3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
37	Gleason, Carolyn; US EPA Region 8	We also recommend Appendix E include a narrative summary to clarify the emission calculation information presented. We found it challenging to verify the representativeness and accuracy of the emission estimates and note that some calculations may not adhere to recommended practices for applying EPA's AP-42 emission factors. We recommend a narrative so that the methods, including the emission factors used, are clearly documented and can be followed by the reader. The narrative should also include a discussion of how ROW Groups 1-8 fit into the year-by-year emissions. With regard to emission factors, we note that emission rates rather than emission factors are listed in the emissions inventory. For example, we found emissions for a 3000 hp generator referenced on pages 163 and 228 but we could not find a location in the emissions inventory where drill rig emission factors were clearly listed. The emissions inventory includes emission factors that have already been modified to account for unit size and are represented in an emission rate of mass per unit time (lb/hr) rather than an emission factor of mass per unit power output and time (e.g., g/hp-hr). Emission factors are important because they are the basis for, and are used to calculate, the emission rates. Therefore, we recommend that the emissions inventory include emission factors so that the reader can understand how the emission rates were calculated. Additionally, it is unclear if estimates of fugitive dust from unpaved roads conform to EPA's methods for estimating emissions. It appears the emissions inventory calculates fugitive dust from unpaved roads utilizing a separate emission factor for light trucks versus heavy trucks. Based on AP-42 Chapter 13, the emission factor should account for the fleet-weighted average vehicle characteristics and only one emission factor should be applied to the fleet after determining whether the road is dominated by a light or heavy fleet-weighted average (light fleets are governed by an equation that varies by speeds; heavy fleets are governed by an equation that varies by mean weighted fleet mass). We recommend demonstrating that, for fugitive dust from unpaved roads, one emission factor representative of the fleet has been used rather than differing emission factors for different classes of equipment. Addressing these recommendations would greatly improve the reader's ability to understand the information in Appendix E, enable others to reproduce emissions estimates, and support the overall defensibility of the calculations presented.	EA Appendix E pages 3-5 outline the assumptions and methodology that were used for the emissions calculations. Additional context is added, where appropriate, in notes on each calculation table. - AP-42 emissions factors for paved and unpaved roads were used to estimate fugitive road emissions in the assumptions and methodology section (EA Appendix E pages 4-5), and AP-42 factors for excavation, backfilling, and windblown dust were used to estimate fugitive dust emissions from earthmoving activities (as footnoted on the PM emissions table for each Construction Group). Further, this analysis relies heavily on the EPA Motor Vehicle Emission Simulator Tool (MOVES 4.0.0) as disclosed in the methodology and assumptions located in EA Appendix E pages 3-5. All emission factors were cited in the methodology and assumptions declarations and/or in a footnote associated with the corresponding calculations. - The footnotes on page 1 of EA Appendix E and in EA Table 3-8 have been revised to clarify where Group 1-9 construction groups, operational emissions, and mobile emissions associated with monitoring fit into the year-by-year emissions. - The 3,000 hp generator within the "Activity 3: Drill Pad Drilling" tables for each construction group would be used to operate the drill rigs. The combustion of fuel in the generator creates the drill rig combustion emissions accounted for in this analysis. The construction equipment row label for "Activity 3: Drill Pad Drilling" has been updated to read "Construction Equipment (Drill Rigs)" to provide additional clarity. The drill rig emission factors are listed for each emission type. This update has been implemented throughout the EA Appendix E, but the first instance can be seen on page 19. - The methodology that was used to estimate fugitive dust from unpaved roads is from AP-42 Chapter 13.2.2. and was included on EA Appendix E page 5. Separate emissions factors for light-duty trucks (equivalent of 0.5-ton truck) and heavy-duty trucks (tractor trailers) were used to indicate two time periods of usage that are not expected to overlap for both construction equipment mobilization and for commuter use. Note that the methodology stated that unpaved roads emissions included emissions from the "new" roads that would need to be constructed. Therefore, there would be fugitive dust due to both construction activities occurring on the road and later from commuting activities to the various pipeline/well pad/ or pump station locations. Since the construction schedule has not finalized at this time, the methodology was revised to include a fleet-weighted average for light-duty and heavy-duty trucks. EA Table 3-3 has been updated to reflect the revised $PM_{2.5}$ emissions. Appendix E has also been updated.
38	Gleason, Carolyn; US EPA Region 8	While we recognize and appreciate the efforts already made in the Draft EA to develop detailed environmental impacts analyses for air and climate change resources, as stated in the cover letter, these analyses would need to be updated to consider broader downstream CO2 emissions if the Project could enable EOR. We therefore recommend clarifying how the Project relates to EOR and other oil and gas development activities in the region both now and in the foreseeable future. We also note that an ROW approval could include an express condition that the project is only authorized for the permanent sequestration of CO2 and the ROW is not authorized for purposes of subsequently utilizing CO2 for EOR purposes.	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The Project does not propose EOR activities. The ROW holder has five years to use the ROW for its authorized purpose, failure to do so for any continuous 5-year period creates a presumption of abandonment [43 CFR §2807.17 (c)]. Amendments or substantial deviation in location or use on an application or grant would require new BLM NEPA reviews and approval [43 CFR §§2807.20 (a)-(b)].

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
39	Gleason, Carolyn; US EPA Region 8	EPA appreciates the inclusion of the Social Cost of Greenhouse Gases (SC-GHG) calculations starting on Page 41 of the EA. These estimates effectively monetize the value of net changes in direct and indirect GHG emissions associated with the Project and provide valuable points of reference for decision makers regarding potential climate change impacts. These references are especially informative for carbon sequestration projects which propose to help prevent the impacts of global climate change by creating a long-term storage reservoir for GHG emissions. In EPA's November 2023 Project scoping comments, we recommended the February 2021 Social Cost of Greenhouse Gases Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990 developed by the Interagency Working Group on Social Cost of Greenhouse Gases, United States Government (IWG) as the primary technical reference for calculating these SC-GHG analyses. Since those comments were submitted, however, EPA has published the November 2023 Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances. This document updates and improves upon the IWG methodologies for calculating SC-GHGs by incorporating scientifically defensible discount rates which accurately reflect modern economic theory and climate change models and consider sources of uncertainty. These updated discount rate values were calibrated using global economic growth and inflation rates through the year 2080. These values have also undergone an expert peer review and are consistent with the recommendations of the National Academies of Science, Engineering, and Medicine (NASEM) on estimating the SC-GHG. We therefore recommend updating the SC-GHG calculations in the EA to reflect the new discount rates summarized at the beginning of the November 2023 document. To better assist lead agencies with the utilization of these updated estimates, EPA has also recently released a Microsoft Excel "Workbook for Applying SC-GHG Estimates v.1.0.1" spreadsheet which can be accessed at https://www.epa.gov/environmental-economics/scghg along with the updated report. This workbook presents a 'plug and play' solution for converting projected emissions estimates into updated SC-GHG evaluations and we anticipate that it will be able to ease any potential burdens stemming from our recommendation to update Project SC-GHG values at this later stage of the NEPA document development process. Please feel free to reach out to us directly if there are any follow up questions regarding these recent updates. We are also available to assist BLM with utilizing the new workbook.	Section 1.5 of the EA clarifies that Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), disbanded the Interagency Working Group on the Social Cost of Greenhouse Gases (IWG) and withdrew all related guidance and estimates, including those for the social cost of carbon. While BLM considered this metric in the Draft EA, Section 6(c) of the Executive Order states that the calculation is scientifically flawed, lacks legislative basis, and undermines U.S. competitiveness. As a result, the social cost of carbon is no longer a valid or required consideration in federal permitting decisions.
40	Gleason, Carolyn; US EPA Region 8	The Draft EA states that upstream emissions from the sourcing of CO2 that is being sequestered is beyond the scope of this analysis and the type and location of emissions sources for this project are unknown at this time (Draft EA, p. 34). However, consistent with the Council on Environmental Quality (CEQ)'s guidance titled National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change, the EPA recommends that the Draft EA provide GHG emission estimates from the upstream carbon-producing source, including not only CO2 but other GHG emissions such as methane and nitrous oxides, if this carbon sequestration project could induce or provide incentives for furthering upstream GHG-producing activities. The project proponent is presumably aware of the upstream sources of the existing Denbury CCA CO2 pipeline from which this project will tier. The Draft EA statement that the type and location of emissions sources for this project under review are unknown at this time also reinforces the concern that additional upstream development beyond that which is currently occurring may be incentivized by the Project and should thus be included in the indirect emissions analysis.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
41	Gleason, Carolyn; US EPA Region 8	Finally, consistent with the CEQ NEPA climate change guidance, the EA should describe reasonably foreseeable climate effects on the affected environment, climate resilience issues posed by potential climate effects on the Project (as discussed above in the context of public safety), and any effects of the Project that may be magnified by climate change. EPA also recommends the existing and expanded discussion of these issues in the EA be updated using the Fifth National Climate Assessment.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

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42	Catherin-Sauer, Augusta; Northern Plains Resource Council	Finally, safety impacts would not come just from major CO2 leaks and blowouts. The Draft EA acknowledges that fugitive emissions will come from "new well pads and from the constructed CO2 pipeline." The Draft EA estimates that the pipeline will leak "0.0014 Gigagrams per kilometer of pipeline," and leakage "from the underground storage formation" will be "0.5 percent over a 100-year monitoring period." Denbury told BLM that these rates "present a very conservative estimate of fugitive CO2 emissions" that could occur. BLM must analyze the foreseeable impacts to health and safety from the expected fugitive CO2 emissions of the Project, as well as incorporate this information about fugitive leaks into its air impacts analysis.	The analysis for the fugitive emissions from the pipeline, wells, and pump stations was conservatively calculated. The operational emissions from the pipelines were assumed to have an annual loss rate of 1.40x10-3 Gg per km of pipeline, which is an emission factor established by the IPCC published within the *Guidelines for National Greenhouse Gas Inventories Chapter 5 - Carbon Dioxide Transport Injection and Geological Storage*. Using this conservative assumption, the fugitive emissions analysis estimated that approximately 100 tons of CO2e would be released over a year across the approximately 40 miles of pipeline. Similarly, the analysis assumed a 0.5% leak rate over 100 years for the pore space using a factor that was published by the NETL's paper *Gate-to Grave Life Cycle Analysis Model of Saline Aquifer Sequestration of Carbon Dioxide*. This paper established an estimated leak rate for pipeline and storage formations including poorly managed and abandoned legacy wells. The emission factors and assumptions used in the Project's fugitive emissions analysis are included in EA Appendix E. The NAAQS were developed by the EPA to provide public health protection especially for "sensitive" populations such as asthmatics, children, and the elderly from air pollution. Secondary standards provide public welfare protection including environmental welfare such as damage to animals, crops, and vegetation. Carbon dioxide is not regulated under the NAAQS for public health; instead, it is regulated as a GHG for its effects on the climate. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

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43	Gleason, Carolyn; US EPA Region 8	It is also not clear in the Draft EA whether the Snowy River operations may enable reasonably foreseeable additional enhanced oil recovery (EOR) through subsequent CO2 extraction after it is stored or if the Project will be used exclusively for permanent CO2 sequestration. While we recognize and appreciate the efforts already made in the Draft EA to develop detailed environmental impacts analyses for air and climate change resource areas, these analyses would need to be updated to consider downstream CO2 emissions if it is reasonably foreseeable that the project will be used to enable EOR. It may also need to be updated to consider upstream emissions and other resource impacts associated with any potential induced growth in the oil and gas development industry supplying CO2 to the Project area. Our detailed comments and recommendations for these sections and all other relevant resource areas are enclosed.	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The Project does not propose EOR activities. EA Section 1.1 describes that the Project would transport CO2 using the existing CCA Pipeline, which currently transports CO2 from the Bell Creek Oilfield in Powder River County, Montana, to the CCA EOR unit development in Fallon County, Montana. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
44	O'Grady, Morgan; Western Environmental Law Center et al.	As detailed in Conservation Groups' comment on the Draft EA submitted April 17, 2024, the proposed Project holds significant risk to the environment and to human health. Perhaps most notable, given BLM's claim that this Project would further national climate goals, is the potential contribution of the Project to greenhouse gas emissions. The Draft EA cites to scientific literature to estimate a leakage rate from the underground storage formation of 0.5% over the initial 100-year monitoring period. BLM arrives at this figure by averaging rates identified in academic studies, which range from 0-1% over a 100-year period. Importantly, however, scientific studies also specify that a "leakage rate of less than 1% per thousand years is necessary for geological storage of CO2 to achieve the same climate benefits as renewable energy sources." In light the discrepancy between these time frames, and the consequences if a leakage rate of 1% over a 1,000-year period is achieved, there is great uncertainty that this project would achieve greater climate benefits than devoting the same resources towards renewables. In light of the potential climate harms this project would incur, as well as other harms detailed in Conservation Groups' earlier comment letter, we encourage BLM to identify the No-Action Alternative as the Environmentally Preferable Alternative.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The EA analyzes two alternatives, including the no action alternative (Alternative 1), under which the BLM would not issue ROW grants and the Project would not be constructed. The environmental effects of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. The analysis assumed a 0.5% leak rate over 100 years for the pore space using a factor that was published by the NETL's paper Gate-to Grave Life Cycle Analysis Model of Saline Aquifer Sequestration of Carbon Dioxide. This paper established an estimated leak rate for pipeline and storage formations including poorly managed and abandoned legacy wells. This is considered to be a conservative estimate (i.e., high estimate) of potential fugitive emission on a twofold front: 1) Denbury would follow the Project's T&M Plan required by 40 CFR §146.90 and approved by the EPA as part of the Class VI permitting process. This is intended to prevent fugitive leaks such as those accounted for in the NETL study from occurring. 2) Other studies suggest it may be appropriate to assume lower leak rates. White et al., (2003) suggest a 0.01% leak rate, and more recently, the National Library of Medicine published a paper by Alcade et al., 2018 that suggests well-regulated storage would retain 98% of the injected CO2 over a 10,000-year period.

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45	Catherin-Sauer, Augusta; Northern Plains Resource Council	Can you please explain more about the purpose of the Snowy River Project and its tie to the resource management plan? We would like to know when the final EIS will be released for the resource management plan? Given the SEIS for the MCFO RMP amendment, discusses greenhouse gas benefits and emissions, see this paragraph: "It is estimated that over a 20-year injection time period, the project area has a potential storage of approximately 409.5 MMT of CO2 on federal land that would be injected by the 15 proposed wells. This project (if approved) when fully operational would potentially more than offset the total federal GHG emissions from production, transportation, and downstream combustion of MCFO federal coal, oil, and gas through 2038. This would be responsive to the United States' 2050 net-zero goal outlined in Executive Order 14008." The EA does not make clear where the waste is coming from that would be sequestered in Carter County. Is the waste coming from Montana or will it extend down into Wyoming? We are deeply concerned since MT has been a dumping ground in the past for out of state waste	The BLM initiated NEPA with the purpose and need to respond to Denbury's SF-299 application requesting ROW grants in Carter County, Montana for sequestering CO2 in accordance with the 2015 MCFO RMP, FLPMA ROW policies and regulations. The MCFO Final SEIS, released for a 30-day protest period on May 17, 2024 and available on BLM ePlanning website, was updated to clarify the total storage potential for the project area is approximately 422 million metric tons of CO2, and Denbury estimated up to 150 million metric tons of CO2 would be injected over a 20-year injection time period. Because the ROW grants were still under review when Draft and Final SEIS were released, this Project was considered for analysis purpose; however, the CO2 that would be stored as a result of the proposed action was not incorporated in the projected emissions. See EIS Section 3.4.3 for details. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
Community			
46	Ogdin, Dustin; Northern Plains Resource Council	The project will cause disruption to landowners and agricultural operations in the area with its construction and potential threats to local groundwater and rangeland degradation.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat.

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47	Carroll, Sharon	Requests the BLM provide 1) Evidence of past and future meaningful engagement with Carter County Landowners, Permit Holders, and the Carter County Commissioners. Meeting minutes of past meetings stated on p. 72 should be produced by the BLM for public viewing. An email reply from BLM on March 13, 2024 that directs the Carter County Land Planning Board and the Commissioners to look at the materials provided, or a statement that it will "include the (Land Planning) Board on future mailings for the Snowy River CO2 Sequestration Project" is not meaningful engagement with the residents who are deeply impacted by the project. 2) Evidence of specific plans for future public meetings with the Carter County Commissioners, the Carter County Land Planning Board, and the C&B Grazing District.	Carter County Commissioner meetings are open to the public, and associated proceedings (i.e., agendas, notes, schedule) can be found on the County website at: https://cartercountymontana.squarespace.com/carter-county-ekalaka-preceedings. The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.
48	Carroll, Llane; Harmon Creek Cattle LLC	The overall social cost for the implementation of alternative two presumes that the benefits of a potential minimal reduction in green house gas outweighs the known costs of implementing alternative two on the local economy of Carter County through disruptions of local customs and cultures.	The BLM initiated NEPA to respond to the pending application requesting ROWs in Carter County, Montana for sequestering CO2 through an EPA UIC Class VI permit in accordance with the 2015 MCFO RMP, FLPMA ROW policies and regulations. NEPA does not require the weighing of costs and benefits of each alternative. The EA discloses the potential impacts for each alternative. See Section 3.4 in the EA for detailed analysis on socioeconomics.
49	Sara Donahoe	And the additional traffic, from pickups to heavy equipment, and what changes it might bring to the area.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat.

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50	Individual	BLM lists Carter County as a environmental justice area. If that is the case, this project does not sustain a commitment to environmental justice. Environmental justice is defined as "The right to a safe, healthy, productive, and sustainable environment for all, where "environment" is considered in its totality to include the ecological (biological), physical (natural and built), social, political, aesthetic, and economic environments." This project does not meet these standards. Carter County will be a less safe and healthy environment in the future if this project moves forward. In particular, the sustainability of the environment is threatened by this project. If we cannot trust the standard conditions that BLM list as undeniably true, how can we trust their judgement on those items that are less clear cut? Those of us who live here know that the standard conditions on the presentation support the project, not the truth. If this project occurs, it will be to the detriment of Carter County and its residents. Carter County has low population. The crowds that have attended these meetings asking questions have been large and completely in opposition to the project. I read all the comments from the earlier comment period from the eplanning site. Of those, not one was in support of the project. I'm not sure why the opposition of the public in both meetings and online is being ignored. Not only is Denbury not a good neighbor to Carter County, the Bureau of Land Management has also proven itself to be impervious to the opinions of Carter County residents. I hate to think that the meeting and comments will be a matter of "checking the box" and that we will be ignored.	NEPA is not a vote but about informed disclosure of impacts for the decision maker and to allow for public input. BLM has solicited input to ensure meaningful engagement from the community to better understand what their concerns are, solicit alternatives and mitigation options.
51	Catherin-Sauer, Augusta; Northern Plains Resource Council	There is a lack of meaningful public input or engagement so far. The first public meeting took place Thursday, October 12, 2023, from 4-6 p.m. at the Ekalaka Event Center. The meeting's purpose was to provide information and gather comments on the proposed Snowy River CO2 Sequestration Project. At the meeting, the public learned that Denbury originally notified BLM and began their plan of development (POD) in November 2021. After two years of BLM and Denbury working together, BLM released the POD in October 2023. The POD is highly technical, over 100 pages long, contains numerous appendices, and yet, BLM originally only gave the local community 30 days to review it for scoping comments before acceding to an extension request. •From the start, local community members felt that their input was not a valued part of BLM's scoping or decision making process. At the meeting, BLM only put out 15 chairs while about 60 concerned residents showed up. BLM also scheduled the meeting during early evening hours on a weekday, which prevented many concerned residents from being able to attend. Several residents commented that it felt like BLM was selling the project rather than making a good faith effort to inform the public. •Attendees of the meeting voiced almost unanimous opposition to the project. Residents in the room stood up several times to say that nobody in the community wanted this to happen. •We feel that the initial BLM scoping meeting is a microcosm of a larger problem. As with many industries, decisions about the land are made without the consultation of the community. •BLM's public meeting for the Draft EA occurred on March 5, 2024, from 5-7 p.m. at the Ekalaka Event Center. Rather than providing an open forum for the public to ask questions, BLM split the crowd into small groups in a separate room. As a result, members of the public were prevented from hearing their neighbors' questions and concerns. Again, the BLM made residents feel as if their concerns were not important. •In short, it feels as though BLM has not made a genuine effort to engage the community. Why has there been a lack of input from relevant expertise such as geologists or hydrologists at the public meetings?	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). There are regulatory requirements for specific BLM permitting/leasing actions to hold public hearings as part of their public engagement and permitting process. Public hearings are not a regulatory requirement for processing BLM ROWs. These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.

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52	Hunkins, Sarah; Western Organization of Resource Councils	Despite this, the BLM field office in Miles City has demonstrated a disinterest in the perspectives and concerns of local people, and has cut the local community out of the conversation at every opportunity possible. The BLM worked with the project developer for two years behind the scenes, and then attempted to give the local community only 30 days to get up to speed on the proposal and weigh in October, 2023. Similarly, this spring, the BLM issued a 228 page draft Environmental Assessment, and only offered locals a 30 day comment period to digest that document and share their comments. Only at the request and urging of different stakeholders has the Miles City field office issued comment period extensions. Overall, the agency has seemed to treat the ROW authorization process as a foregone conclusion and speed that process up at every step. Many local residents have stated that it feels like eastern Montana is being used as a sacrifice zone to support the goals and profits of a large, out-of-state corporation like Exxon Mobil, while the voices of local people have been deemed irrelevant or a nuisance.	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.
53	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The U.S. Climate Resilience Toolkit's Climate and Economic Justice Screening Tool (CEJST) identifies areas across the nation where communities are faced with significant burdens falling into eight categories: climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. According to the CEJST, Carter County, Montana (where the Project would be located) is "considered disadvantaged because it meets more than one burden threshold and the associated socioeconomic threshold." For this reason, the Project triggers the intensity factor for overburdened communities. One burden where Carter County exceeds the 90th percentile threshold is climate change impacts. Expected population loss owing to "fatalities and injuries resulting from natural hazards each year" is in the 92nd percentile. The County is also in the 70-88th percentile for expected agriculture loss rate, economic loss, projected flood risk, and wildfire risk. Carter County ranks in the 99th percentile for energy cost. The County is in the 72nd percentile for low income, which qualifies as disadvantaged based on the comparison to the 65th percentile.	An environmental justice analysis is not required for the Project due to recent changes in federal policy. Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and the accompanying Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), direct federal agencies to strictly follow the NEPA as written in statute. These directives also repeal previous Executive Orders 12898 and 14096, which had required consideration of environmental justice in federal decision-making. Because those prior Executive Orders have been repealed, the BLM is not obligated to conduct an environmental justice evaluation to make a reasoned decision under NEPA. The Project would provide job opportunities, contribute funds to the State of Montana, and temporarily increase retail sales and lodging fees. No residences would be displaced, no changes to existing ambient sound levels would occur at the residences closest to noise generating facilities, BLM grazing permits and use of publicly accessible lands would not be affected, and traffic impacts would be mitigated as described in Section 1.7.1 and the POD. Additional committed measures that would reduce environmental and community impacts include the phased development of Project construction and CO2 injection over a 20-year period, timing restrictions that would limit construction to a 5-month period in any given year, and construction and reclamation methods that would further avoid and minimize environmental impacts. Pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, and flowlines and bulklines would be equipped with a system that would allow for remote monitoring and control of the pipelines, wells, and pump stations. Human health and safety concerns would be further mitigated though the implementation of an Emergency Response Plan in the event that an emergency were to occur. The analysis found that the Project would not generate adverse human health or environmental effects.

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54	Gleason, Carolyn; US EPA Region 8	Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994) has been supplemented by EO 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All (April 26, 2023). As set forth in this EO: "'Environmental justice' means the just treatment and meaningful involvement of all people, regardless of income, race, color, national origin, Tribal affiliation, or disability, in agency decision-making and other Federal activities that affect human health and the environment so that people: (i) are fully protected from disproportionate and adverse human health and environmental effects (including risks) and hazards, including those related to climate change, the cumulative impacts of environmental and other burdens, and the legacy of racism or other structural or systemic barriers; and (ii) have equitable access to a healthy, sustainable, and resilient environment in which to live, play, work, learn, grow, worship, and engage in cultural and subsistence practices." EO 14096 directs federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects including risks and hazards of federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice (EJ) concerns. Consistent with NEPA obligations, Executive Orders, and BLM's EJ policies, the EPA has identified areas within the EJ analysis where we recommend providing additional information or clarification to effectively assess the potential Project effects on communities with EJ concerns. These suggestions assume that a more detailed impact analysis in line with our comments above will be undertaken. The Draft EA identifies Carter County, Montana, where the Project is located, as a low-income community within the Environmental Justice impacts analysis. EPA's EJScreen tool, which relies on census data, also indicates that the population in Carter County may be experiencing disproportionate human health impacts, including heart disease, cancer rates, and potential ozone exposure, as compared to state and national averages. The area also has higher rates of individuals with disabilities as well as persons lacking health insurance and access to broadband internet as compared to the state and country. Existing disparities, historic inequities, and environmental and health burdens in the low-income communities should be considered in the EJ analysis.	An environmental justice analysis is not required for the Project due to recent changes in federal policy. Executive Order 14154, *Unleashing American Energy* (Jan. 20, 2025), and the accompanying Presidential Memorandum, *Ending Illegal Discrimination and Restoring Merit-Based Opportunity* (Jan. 21, 2025), direct federal agencies to strictly follow the NEPA as written in statute. These directives also repeal previous Executive Orders 12898 and 14096, which had required consideration of environmental justice in federal decision-making. Because those prior Executive Orders have been repealed, the BLM is not obligated to conduct an environmental justice evaluation to make a reasoned decision under NEPA.

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55	Gleason, Carolyn; US EPA Region 8	After identifying populations with potential EJ concerns, we recommend taking measures to encourage members of the identified communities to participate in the NEPA process at all stages. Consistent with EOs 12898 and 14096, we recommend that the BLM and Denbury engage with, and provide educational sessions to Carter County communities to provide information and seek their input on the proposed project, CO2 sequestration technology, the potential risks and impacts associated with the CO2 pipelines, emergency response planning, and mitigation measures. This outreach can expand upon the existing public comment period and should occur prior to the development of final mitigation measures and a final decision. This targeted education and engagement process with communities with EJ concerns and the outcomes of such engagement should be fully documented in the EA as supported by the BLM guidance referenced above.	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.
56	Gleason, Carolyn; US EPA Region 8	Consistent with Sections 3(a)(ix)(A-B) of EO 14096, the NEPA analysis should analyze the potential environmental and health impacts associated with the Project's construction and operations, including risks from a potential pipeline rupture, and the manner in which such actions could further exacerbate disproportionate impacts in these communities. The BLM Project Scoping Report also provides helpful information on community concerns and indicates that many commenters are concerned about economics, health, and safety. The comments identify concerns about the rural nature of the community and the lack of infrastructure to accommodate the impacts associated with project development and operations as well as impacts from a pipeline rupture. Many commenters also raised concerns about economic impacts related to taxes, real estate values, agriculture, and other local industries. The NEPA analysis should address and analyze these concerns in light of the existing economic and health disparities. Section 3.4.3 of the impact analysis provides minimal discussion of these concerns and does not include analysis of the manner in which the project, including a potential pipeline rupture, could further exacerbate existing health, environmental, and economic disparities experienced in the identified low-income or Tribal communities. Once this and other analyses recommended in these comments are prepared, the EPA suggests that the BLM reassess its conclusion in the Draft EA that the Project would have no disproportionate or adverse human health or environmental effects on low-income or minority populations.	EA Section 3.4.1 discloses that Carter County has a low population density of 0.4 people per square mile. Residences are scattered throughout the county, which includes 3,341 square miles of land. An environmental justice analysis is not required for the Project due to recent changes in federal policy. Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and the accompanying Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), direct federal agencies to strictly follow the NEPA as written in statute. These directives also repeal previous Executive Orders 12898 and 14096, which had required consideration of environmental justice in federal decision-making. Because those prior Executive Orders have been repealed, the BLM is not obligated to conduct an environmental justice evaluation to make a reasoned decision under NEPA. The Project would provide job opportunities, contribute funds to the State of Montana, and temporarily increase retail sales and lodging fees. No residences would be displaced, no changes to existing ambient sound levels would occur at the residences closest to noise generating facilities, BLM grazing permits and use of publicly accessible lands would not be affected, and traffic impacts would be mitigated as described in Section 1.7.1 and the POD. Additional committed measures that would reduce environmental and community impacts include the phased development of Project construction and CO2 injection over a 20-year period, timing restrictions that would limit construction to a 5-month period in any given year, and construction and reclamation methods that would further avoid and minimize environmental impacts. Pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, and flowlines and bulklines would be equipped with a system that would allow for remote monitoring and control of the pipelines, wells, and pump stations. Human health and safety concerns would be further mitigated though the implementation of an Emergency Response Plan in the event that an emergency were to occur. The analysis found that the Project would not generate adverse human health or environmental effects.

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57	Gleason, Carolyn; US EPA Region 8	The EPA recommends working with Denbury so that the final analysis and decision reflect reasonable mitigation measures, including those that take into consideration the existing disparities experienced in the potentially impacted communities. In addition to the mitigation measures suggested in our comments on Public Safety above, measures specific to the community challenges could include conducting enhanced public engagement and input on emergency response measures, tailoring public outreach to accommodate the lack of broadband internet access, making accommodations for the higher rates of persons with disabilities and accompanying emergency evacuation challenges, and implementing a whole-of-government approach as envisioned in EO 14096 to ensure local emergency and medical facilities are equipped to treat for CO2 exposure. Example mitigation measures to consider during this process could include: - Training for local responders at no cost to the local community while training facility staff to respond to emergencies at the facility. - Identification of a chain of command for notifying the public of an emergency and incorporate these details into Denbury's Emergency Response Plan (POD Appendix W). Communities should be involved in this process. - Developing evacuation procedures for areas that could be impacted by a CO2 leak, factoring in geography of the area and whether transportation may be an issue for certain communities (e.g., buses for evacuation may be needed for certain communities). - Developing plans for notification of well-related issues and emergencies, including a consideration of local community language needs. - Establishing and maintaining first responder contracts for specified types of response actions for the lifetime of the project (e.g., well blowouts, USDW contamination, large CO2 releases to atmosphere).	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Figure 3 in EA Appendix D shows the project sequence associated with BLM, EPA, and State of Montana. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. As described in Denbury's Emergency Response Plan (POD Appendix W) and in POD Section 7.1, local response officials would be provided training on how to respond to Project-related emergencies, and they would be invited to participate in annual table-top drills. Denbury would manage any incidents using a unified command structure in coordination with applicable federal, state, and local agencies following the National Incident Management System Incident Command System. As required in 40 CFR §146.94, Denbury would prepare a site-specific Emergency and Remedial Response Plan for EPA review and UIC Program Director approval as part of the Class VI UIC Permit application process. Following the EPA's UIC Program Class VI Well Project Plan Development Guidance, the Emergency and Remedial Response Plan would be revisited and revised, as needed, after the initial AoR modeling is completed, after each reevaluation of the AoR, and as needed throughout the life of the Project, including through the Post-Injection Site Care period. The EPA recommends that a variety of site-specific factors, including but not limited to the presence of communities and sensitive populations, should be considered in development of the Emergency and Remedial Response Plan.
58	Rydell, Carol and Robert	The Snowy River project would hurt the county and its residents and it would not benefit the local community in any way. We ask you to deny Denbury's application for a right-of-way permit and to choose the "No Action" alternative.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
59	Luedke, Bret	All the financial benefits of the project will be received by Denbury and all the risk, financial and otherwise, will be endured by the public lands and local residents in Carter County.	See EA Section 3.4.3 for socioeconomic effects from the proposed action. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded. Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR §146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR §146.85(a)(2)].
60	Vanderbilt, Amy	This project would negatively impact those residents who live and/or recreate or hunt near the proposed carbon sequestration development and offers no meaningful benefit to the local community.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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61	Morris, Karen	Once again, this appears to be a case of promoting corporate interests at the expense of residents in the area. There may be a low population density; however, each of these lives IS important.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
62	Rouane, Patrick	Additionally, it is disheartening to see the total lack of care the BLM has shown to the locals overall health, safety, and financial means. For someone who is a born native to this state, I would expect much more from the department that is in charge of this states public lands. This project impacts every aspect of our way of life, and the total negligence the BLM has shown is another black mark against them. If this project does become a reality, the BLM will lose total credibility to the people they are supposed to be in support of. The inaction of the BLM has shown that, even though they are the shepherds of this beautiful states public lands, they have no regard for its safety.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
63	Izlar, Kay	We must not be short sighted and use technologies that have either not been proven to work, or have been shown to be detrimental to local land and communities. This is just another corporate money making scheme at the expense of the people of Montana.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.
64	Lunt, Laela	Furthermore, throughout this comment period, the people have been fighting a skewed system that is clearly working against them. Advocating for our lands is our duty as Americans who spend our livelihoods working to protect what little purity and beauty we have left. BLM has not allowed our people to rally together and speak freely in the meetings from March. With blocked commenting, the power to sift through the public's questions and decide which you answer, hiding names of those attending the meeting to prevent us from coming together - it saddens me to see how we seem to truly have to fight for ourselves with little to no real chance of being supported. It is most unfortunate.	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). There are regulatory requirements for specific BLM permitting/leasing actions to hold public hearings as part of their public engagement and permitting process. Public hearings are not a regulatory requirement for processing BLM ROWs. These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.

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65	Summers, Steve	The analysis that was done on the community I found to be woefully inaccurate. Housing is already in short supply this project will only raise rent. Our fire department is VOLUNTEER, mostly made up of ranchers with no shortage of things to do. This project will only put more stress and strain on our infrastructure.	EA Section 3.4.3 was updated to clarify the anticipated workforce and housing requirements. If qualified workers are unavailable in Carter and Fallon counties, Denbury would hire additional workers from outside of the counties. Temporary non-resident workers are anticipated to occupy local hotels, motels, and RV camps in Ekalaka and Baker, and temporary housing needs would be discontinuous due to the limited construction timeframe of July 16 - November 30 in any given year during the phased Project development over a 20-year period. Housing for permanent workers may include rental housing or home ownership. EA Section 3.4.3 was also revised to clarify that the anticipated size of the required construction workforce, temporary construction periods of 5 months during any given year, and the phased development of the Project over a 20-year period should not overtax the capacity of existing emergency services. Enrollment in local schools is not expected to increase as a result of the Project. As described in Denbury's Emergency Response Plan (POD Appendix W) and in POD Section 7.1, local response officials would be provided training on how to respond to Project-related emergencies, and they would be invited to participate in annual table-top drills. Denbury would manage any incidents using a unified command structure in coordination with applicable federal, state, and local agencies following the National Incident Management System Incident Command System. As required in 40 CFR §146.94, Denbury would prepare a site-specific Emergency and Remedial Response Plan for EPA review and UIC Program Director approval as part of the Class VI UIC Permit application process. Following the EPA's UIC Program Class VI Well Project Plan Development Guidance, the Emergency and Remedial Response Plan would be revisited and revised, as needed, after the initial AoR modeling is completed, after each reevaluation of the AoR, and as needed throughout the life of the Project, including through the Post-Injection Site Care period. The EPA recommends that a variety of site-specific factors, including but not limited to the presence of communities and sensitive populations, should be considered in development of the Emergency and Remedial Response Plan.
66	Bruce, Stanley	This sounds something that is really irresponsible. Carter County is one of the lowest population-density in the US. The residents work hard, have to deal with transportation issues, difficult winter conditions, blizzards and improvise to make things work. In addition, this type of project greatly impinges on landowner rights. As it is, Carter County agriculture is long term sustainable. However, this waste pipeline idea has the potential to totally disrupt everyone that lives there. Passing the responsibility for massive quantities of pollution from wealthy corporate interests to relatively small-scale agriculture is gross negligence. Please stop this proposal and allow Carter County residents to live their lives in peace in the beautiful and tranquil environment as it currently exists.	As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners (the BLM, State of Montana, and one private landowner), low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
67	Marks, Kathleen	The BLM estimates that there are 188 vacant houses in Carter County. However, vacant houses do not translate to available housing. A consistent complaint from the schools and the hospital is the lack of housing for their staffs. An EIS is required to analyze the actual housing situation in the county.	EA Section 3.4.3 was updated to clarify the anticipated workforce and housing requirements. If qualified workers are unavailable in Carter and Fallon counties, Denbury would hire additional workers from outside of the counties. Temporary non-resident workers are anticipated to occupy local hotels, motels, and RV camps in Ekalaka and Baker, and temporary housing needs would be discontinuous due to the limited construction timeframe of July 16 - November 30 in any given year during the phased Project development over a 20-year period. Housing for permanent workers may include rental housing or home ownership.

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68	Marks, Kathleen	The EA assumes that local law enforcement, emergency services, and schools will provide services for incoming workers, but there is no indication that these entities have been contacted. Carter County will receive very little tax revenues from the project, leaving local taxpayers to bear the burden.	EA Section 3.4.3 was revised to clarify that the anticipated size of the required construction workforce, temporary construction periods of 5 months during any given year, and the phased development of the Project over a 20-year period should not overtax the capacity of existing emergency services. Enrollment in local schools is not expected to increase as a result of the Project. As described in Denbury's Emergency Response Plan (POD Appendix W) and in POD Section 7.1, local response officials would be provided training on how to respond to Project-related emergencies, and they would be invited to participate in annual table-top drills. Denbury would manage any incidents using a unified command structure in coordination with applicable federal, state, and local agencies following the National Incident Management System Incident Command System. As required in 40 CFR §146.94, Denbury would prepare a site-specific Emergency and Remedial Response Plan for EPA review and UIC Program Director approval as part of the Class VI UIC Permit application process. Following the EPA's UIC Program Class VI Well Project Plan Development Guidance, the Emergency and Remedial Response Plan would be revisited and revised, as needed, after the initial AoR modeling is completed, after each reevaluation of the AoR, and as needed throughout the life of the Project, including through the Post-Injection Site Care period. The EPA recommends that a variety of site-specific factors, including but not limited to the presence of communities and sensitive populations, should be considered in development of the Emergency and Remedial Response Plan.
Cultural Resources			
69	Individual	Cultural resources--BLM has stated that there will be no impacts to cultural resources with this project. Though Denbury stated that no cultural resources were found in their examination of the project footprint, the Carter County Museum director found numerous artifacts in his examination of the same area. He also found evidence of willful desecration of cultural sites. The area showed UTV tracks over the land and over the actual artifacts with the intent to obscure any evidence of their existence. This area is in the Hell Creek formation which is known as an area rich in both dinosaur remains and Native American artifacts. It would be a shame to lose the rich cultural information to be gained from these resources.	A cultural resources analysis was completed, and as described in EA Section 3.3.1, 218 cultural sites were identified within the physical APE. All sites were evaluated for their inclusion in the NRHP, and 21 were determined to be eligible for the NRHP. As discussed in EA Section 3.3.3, the proposed infrastructure avoids impacts to all historic properties except for one eligible cultural site, Lone Tree Road. The BLM determined there would be no adverse effects to Lone Tree Road, as the use of the road would not change the historical character of the road. The BLM also developed an AV-APE to determine if the Project and its proposed infrastructure would have a significant impact to the viewshed of the Chalk Buttes TCP. The BLM determined that there would be no adverse effect to the Chalk Buttes TCP viewshed due to the distance from the TCP and the applicant committed visual design measures in the POD. The Montana SHPO concurred that the undertaking will have no adverse effect to historic properties in letters dated October 26, 2023 and October 27, 2023.
70	Millbrooke, Anne	The site is public lands, mostly BLM, some state, but the area has a history of sparse migrations and sparse settlements. Being sparse does not negate the importance of cultural artifacts of prehistoric and historic indigenous peoples and the Euro-American settlers and even post settlement culture. The negative impacts on mostly unstudied prehistoric artifacts in particular is not given due attention. The sparsity makes any record of cultural presence more valuable, not less valuable.	A cultural resources analysis was completed, and as described in EA Section 3.3.3, the BLM determined there would be no adverse effects to the one eligible cultural site, Lone Tree Road, as the use of the road would not change the historical character of the road. Moreover, there would be no adverse effect to the Chalk Buttes TCP viewshed due to the distance from the TCP and the applicant committed visual design measures in the POD. The Montana SHPO concurred that the undertaking will have no adverse effect to historic properties in letters dated October 26, 2023 and October 27, 2023.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
71	Montana Wildlife Federation	Carter County is known for its significant cultural resources and large geological fossil presence. As with other areas in this analysis, the minimization of effects with "woulds", the actions proponents would take to mitigate, is insufficient, nor does it meet the requirements of NEPA. NEPA analysis explains daylight effects. This insufficiency in the study can be accommodated by a third alternative, which displays the proposal's impact without all the "woulds and fingers crossed" regarding the proponents' actions. Secondly, no remedy has been mentioned or addressed should these mitigation measures not be met. There is a deep history of ineffective or not-as-analyzed effects with the many oil and gas ventures, including coal bed methane, which BLM has permitted in eastern MT. Communities are left with ugly scars from these sorts of activities and persistent water, road, or other environmental issues that BLM does not have the staff or staff with the necessary skills to monitor or enforce. The analysis of the vast cultural and paleontological resources within the project area has been minimized with proposed mitigation with no demonstratable, measurable, or best practices criteria. The implementation promises of "would do" required by the project proponent are insufficient for NEPA and surreptitiously lessen effects to avoid triggering an EIS. NEPA requires the display of consequences not based on the fingers-crossed methodology presented in this EA. With the recent shutdown of BLM's massively fraught 100 x100,000's of acres of permitted Coalbed Methane development in northern Wyoming and southeastern Montana, is there any wonder that the public scrutinizes yet another BLM fingers-crossed analysis?	A cultural resources analysis was completed, and as described in EA Section 3.3.1, 218 cultural sites were identified within the physical APE. All sites were evaluated for their inclusion in the NRHP, and 21 were determined to be eligible for the NRHP. As discussed in EA Section 3.3.3, the proposed infrastructure avoids impacts to all historic properties except for one eligible cultural site, Lone Tree Road. The BLM determined there would be no adverse effects to Lone Tree Road, as the use of the road would not change the historical character of the road. The BLM also developed an AV-APE to determine if the Project and its proposed infrastructure would have a significant impact to the viewshed of the Chalk Buttes TCP. The BLM determined that there would be no adverse effect to the Chalk Buttes TCP viewshed due to the distance from the TCP and the applicant committed visual design measures in the POD. The Montana SHPO concurred that the undertaking will have no adverse effect to historic properties in letters dated October 26, 2023 and October 27, 2023. The POD committed measures and design features are enforceable by the BLM. Section 7 of the BLM ROW SF-299 application requires a project description, which may be submitted in a POD. As part of the ROW grant, if issued, stipulate that the ROW is subject to the terms and conditions in 43 CFR Part 2800, the terms and conditions/stipulations, design features and/or mitigations set forth in the application, POD, and the grant. Furthermore, EA Section 1.5 states that the ROW grant would be subject to terms and conditions in 43 CFR Part 2800, the terms and conditions and stipulations specified, and mitigations set forth in the application and POD. Therefore, all applicant committed measures and design features in the POD are enforceable by BLM through the ROW grant.
72	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Project will negatively impact cultural artifacts and resources in the area. BLM should make efforts to gather input from both impacted local residents and other pertinent stakeholders such as local area cultural resource experts, landowners and grazing permittees, the 17 tribes named in the Draft EA, and the Turtle Mountain Band of Chippewa Indians whose members have land holdings in the area. There is insufficient evidence to support that paleontological and cultural resource surveys—and thus, BLM's NEPA analysis—are accurate. Denbury surveyed only a small portion of the 110,100 acres of impacted land. The Draft EA relies on surveying completed previously on approximately 4,002 acres. For the potential of approximately 93,153 acres of un-inventoried lands within the APE, the initial BLM modeling of the cultural environment found that the Project APE has the potential to have 355 unrecorded sites. Overall 19 sites in the APE will be impacted by project infrastructure. Given this assessment and the number of documented sites, it is unclear why or how the BLM determined that the proposed Project would have no effect on cultural and historic properties.	Section 4.2 of the EA discloses BLM's tribal consultation and coordination with all 17 consulting tribes, which included Turtle Mountain Band of Chippewa. As part of consultation, the BLM invited all 17 tribes to participate in cultural surveys, and three tribes (Rosebud, Standing Rock, and Crow) participated. Section 4.2 was updated to include recent input from tribes. A cultural resources analysis was completed, and as described in EA Section 3.3.1, 218 cultural sites were identified within the physical APE. All sites were evaluated for their inclusion in the NRHP, and 21 were determined to be eligible for the NRHP. As discussed in EA Section 3.3.3, the proposed infrastructure avoids impacts to all historic properties except for one eligible cultural site, Lone Tree Road. The BLM determined there would be no adverse effects to Lone Tree Road, as the use of the road would not change the historical character of the road. The BLM also developed an AV-APE to determine if the Project and its proposed infrastructure would have a significant impact to the viewshed of the Chalk Buttes TCP. The BLM determined that there would be no adverse effect to the Chalk Buttes TCP viewshed due to the distance from the TCP and the applicant committed visual design measures in the POD. The Montana SHPO concurred that the undertaking will have no adverse effect to historic properties in letters dated October 26, 2023 and October 27, 2023. EA Section 4.2 was updated to include a description of comments the BLM received from the Northern Arapaho THPO on the EA.

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73	C'Bearing, Crystal; Northern Arapaho Tribal Historic Preservation Office	Our office has come to this determination by drawing conclusions from the survey and file search from maps depicting the provenience of sites regarding the Direct and Visual APE. Within the Area of Potential Effect, there are: Cultural Resources: ONE OR MORE Eligible Historic Properties: ONE OR MORE Probability of properties of religious and cultural significance to the Northern Arapaho: LOW If traditional cultural properties, rock features, or human remains are found during excavation with any new ground disturbance, we request to be contacted and a report provided.	Section 4.2 of the EA discloses tribal consultation and coordination with all 17 consulting tribes, which included Turtle Mountain Band of Chippewa, and the BLM. As part of consultation, the BLM invited all 17 tribes to participate in cultural surveys, with three tribes (Rosebud, Standing Rock, Crow) participating. Section 4.2 was updated to include recent input from tribes. A cultural resources analysis was completed, and as described in EA Section 3.3.1, 218 cultural sites were identified within the physical APE. All sites were evaluated for their inclusion in the NRHP, and 21 were determined to be eligible for the NRHP. As discussed in EA Section 3.3.3, the proposed infrastructure avoids impacts to all historic properties except for one eligible cultural site, Lone Tree Road. The BLM determined there would be no adverse effects to Lone Tree Road, as the use of the road would not change the historical character of the road. The BLM also developed an AV-APE to determine if the Project and its proposed infrastructure would have a significant impact to the viewshed of the Chalk Buttes TCP. The BLM determined that there would be no adverse effect to the Chalk Buttes TCP viewshed due to the distance from the TCP and the applicant committed visual design measures in the POD. The Montana SHPO concurred that the undertaking will have no adverse effect to historic properties in letters dated October 26, 2023 and October 27, 2023.
Fish Habitat - Aquatics			
74	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Furthermore, as evidenced in the letter submitted by the Montana Department of Fish, Wildlife and Parks, there are watercourses on the project site that are connected as tributaries into streams known to recently contain pallid sturgeon, a federally-recognized endangered species. The EA states flatly that "there are no pallid sturgeon (*Scaphirhynchus albus*) or potential habitat for the species in the Project area." Montana FWP's letter, however, casts doubt on that certainty and emphasizes the importance of the tributaries within the project area that feed into pallid sturgeon habitat.	The MCFO interdisciplinary team considered the Montana Natural Heritage Program database, USFWS Information for Planning and Consultation (IPaC) database, internal BLM data, staff expertise, and other information, as appropriate, to determine if special status species or associated habitats are known to occur or could occur in the Project area. As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse), fisheries, including special status species, and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses are not warranted. Specific for pallid sturgeon, BLM determined in EA Section 1.7.4 that there are no pallid sturgeon or potential habitat for the species in the project area. EA Section 1.7.4 was revised to include clarification that Timber Creek and its tributaries drain to the Powder River, which contains known pallid sturgeon habitat. None of the proposed ROW elements (injection wells, bulklines, or access roads) intersect Timber Creek or tributaries thereto; therefore, the Project is not anticipated to impact any streams within the Powder River watershed. Furthermore, the USFWS did not include pallid sturgeon in its recommendation of species to include in the analysis. See EA Section 4.2 for coordination with USFWS.
75	Catherin-Sauer, Augusta; Northern Plains Resource Council	Furthermore, as evidenced in the letter submitted by the Montana Department of Fish, Wildlife and Parks, there are watercourses on the project site that are connected as tributaries into streams known to recently contain pallid sturgeon, a federally-recognized endangered species. The EA states that "there are no pallid sturgeon (*Scaphirhynchus albus*) or potential habitat for the species in the Project area." Montana FWP's letter, however, casts doubt on that certainty and emphasizes the importance of the tributaries within the project area that feed into pallid sturgeon habitat.	The MCFO interdisciplinary team considered the Montana Natural Heritage Program database, USFWS IPAC database, internal BLM data, staff expertise, and other information, as appropriate, to determine if special status species or associated habitats are known to occur or could occur in the Project area. As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse), fisheries, including special status species, and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses are not warranted. Specific for pallid sturgeon, BLM determined in EA Section 1.7.4 that there are no pallid sturgeon or potential habitat for the species in the project area. EA Section 1.7.4 was revised to include clarification that Timber Creek and its tributaries drain to the Powder River, which contains known pallid sturgeon habitat. None of the proposed ROW elements (injection wells, bulklines, or access roads) intersect Timber Creek or tributaries thereto; therefore, the Project is not anticipated to impact any streams within the Powder River watershed. Furthermore, the USFWS did not include pallid sturgeon in its recommendation of species to include in the analysis. See EA Section 4.2 for coordination with USFWS.
General			

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76	Ogdin, Dustin; Northern Plains Resource Council	The project will have a negative impact on public lands, at-risk wildlife species, recreation, and cultural artifacts.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
77	BLM Stakeholder	I support this proposal so long as it is safe and secure. Any leaks could be devastating to public safety and environmental quality. The climate crisis is an existential threat to humanity. Fossil fuels must be rapidly phased out. Atmospheric carbon is harmful and should be safely sequestered whether underground or in growing trees, vegetation, and soil. Thank you very much for this important work and for considering my input.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that prior to use of the BLM ROW, Denbury would be required to submit verification of the EPA approved UIC permit to the BLM. This would ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Under 40 CFR Part 146 Subpart H, the UIC program regulates all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites. EPA UIC Class VI regulations require CO2 be injected only in aquifers with a higher level of salinity that prevents its use as a drinking water aquifer (a salinity level of greater than 10,000 mg/L total dissolved solids). The CO2 plumes would be vertically confined by low permeability shales and mudstones. Detailed analysis and predictive modeling would be performed as part of the UIC Class VI permitting process to verify the ability of the shales and mudstones to limit the vertical migration CO2 before EPA would approve to inject. The EPA requires "baseline geochemical data on subsurface formations, including all USDWs in the area of review" for Class VI UIC wells [40 CFR §146.82(a)(6)]. As described in POD Section 5.5, Denbury conducted sampling and analysis of groundwater and surface water samples in 2022 and 2023 as part of its baseline characterization program. Potential fluid leakage (e.g., CO2 or formation fluid) to USDWs would be routinely monitored during the life of the Project in accordance with an EPA-approved T&M Plan and MRV Plan as discussed in POD Appendix A. Routine monitoring would include evaluation of elevated concentrations of indicator parameters in surface water, soil, gas, and ambient air samples. An Emergency and Remedial Response Plan, as required under 40 CFR §146.94(a) and approved by the EPA as part of the UIC permitting process, would be implemented to protect USDWs in the event that movement of the injection or formation fluid may endanger a USDW during construction, operation, and post-injection site care periods.
78	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Snowy River Draft EA (DOI-BLM-MT-C020-2023-0070-EA) says the following is available: "In-depth information regarding the assumptions and methodology utilized in the air quality analysis is located in Appendix E." Appendix E, however, is the Access Road List, and no other appendix has air quality assumptions and methodology. Please correct and update the EA and record to include the air quality methodology. Because this is a significant piece of information that has been erroneously withheld from the public, we ask that you provide a comment extension at least commiserate with the amount of time the public was without this information from the start of the comment period. This is not meant to supplant any other comment extension requests your office has received, but this is a critically important reason for an extension. We have attached a letter with this information and request. I also emailed Ms. Nansel and called her earlier this afternoon of March 8, 2024.	On March 11, 2024, the BLM responded to the commenter to explain the EA document contains a set of appendices separate from those in the POD. The Appendix E referred to in the EA was the last appendix in the EA document. Clarifying text was added to EA Section 3.2 to ensure the EA text properly refers to appropriate Appendix E in the EA for air quality analysis calculations.
79	Mccutchan Royer, Shantel	Will the pipe be tested before they run co2 through it for leaks? If so, how will it be tested? And if with water where will the water come from? And how much water?	As described in POD Section 4.2.13 and the Hydrostatic Test Plan in POD Appendix L, the pipelines would be hydrostatically tested in compliance with USDOT regulations (49 CFR Part 195 Subpart E) before being placed into service. Denbury would procure water for dust suppression and hydrostatic testing from off-site permitted sources in Baker, Ekalaka, and/or Broadus. EA Section 2.1.1 has been revised to include water source information. Water would be transported to the site using water trucks. Denbury may utilize temporary water tanks located within the approved ROWs to support water requirements during construction activities. Denbury would obtain permits from the jurisdictional agencies for the use and discharge of hydrostatic test water. Denbury would comply with the rules and regulations of the USDOT, Montana DNRC (water use), and the MDEQ (water discharge permit). Water would be reused to the extent possible between test sections.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
80	Mccutchan Royer, Shantel	What happens after the 50 years? Can someone else use the pipeline for anything or the substation? Who's responsible for the site?	Substations are not part of the proposed action. As stated in EA Section 2.1.1, at the time of abandonment of BLM ROWs, Denbury would obtain any required authorization from the BLM, State, and EPA for the respective authorities. All infrastructure and facilities would be removed and disposed of or recycled in approved locations. Re-grading and revegetation of BLM disturbed areas would be completed in accordance to BLM requirements and procedures described in the POD and Appendix G. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)].
81	Mccutchan Royer, Shantel	Is the BLM receiving any money from this project? If so how much?	The Project is a FLPMA ROW, which generates rentals and fees payable to the BLM that are deposited into the federal treasury. In accordance with 43 CFR §2806, the BLM must receive Fair Market Value (FMV) based on appraised values or approved schedules, such as the linear ROW or the small site schedules, as appropriate, for the ROW surface acreage within the proposed Project area as an annualized rental. In addition, the BLM will determine an appropriate charge in consultation with the Appraisal and Valuation Services Office (AVSO) for injecting actual amounts of CO_2 for sequestration into Federal pore space and use and occupancy of the pore space, as appropriate, on a per unit basis.
82	Individual	Storing massive amounts of carbon pollution from industrial projects underground, which likely contains other contaminants, risks harm to groundwater quality and quantity as well as risks to the stability of local geography.	As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO_2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that prior to use of the BLM ROW, Denbury would be required to submit verification of the EPA approved UIC permit to the BLM. This would ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Under 40 CFR Part 146 Subpart H, the UIC program regulates all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites. EPA UIC Class VI regulations require CO2 be injected only in aquifers with a higher level of salinity that prevents its use as a drinking water aquifer (a salinity level of greater than 10,000 mg/L total dissolved solids). The CO2 plumes would be vertically confined by low permeability shales and mudstones. Detailed analysis and predictive modeling would be performed as part of the UIC Class VI permitting process to verify the ability of the shales and mudstones to limit the vertical migration CO2 before EPA would approve to inject. The EPA requires "baseline geochemical data on subsurface formations, including all USDWs in the area of review" for Class VI UIC wells [40 CFR §146.82(a)(6)]. As described in POD Section 5.5, Denbury conducted sampling and analysis of groundwater and surface water samples in 2022 and 2023 as part of its baseline characterization program. Potential fluid leakage (e.g., CO2 or formation fluid) to USDWs would be routinely monitored during the life of the Project in accordance with an EPA-approved T&M Plan and MRV Plan as discussed in POD Appendix A. Routine monitoring would include evaluation of elevated concentrations of indicator parameters in surface water, soil, gas, and ambient air samples. An Emergency and Remedial Response Plan, as required under 40 CFR §146.94(a) and approved by the EPA as part of the UIC permitting process, would be implemented to protect USDWs in the event that movement of the injection or formation fluid may endanger a USDW during construction, operation, and post-injection site care periods.

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83	Individual	This project would waste taxpayer dollars while only benefiting project owner Denbury's financial interests.	The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
84	Individual	This project will limit access and degrade public lands used for recreation and that are home to cultural artifacts and wildlife. We shouldn't turn pristine grasslands into an industrial dumping ground.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
85	Ream, Tarn	The proposal to construct and operate a CO2 sequestration project and pipeline in southeastern Montana would allow for Exxon to use federal tax credits intended to mitigate climate change but could make ExxonMobil billions of dollars and result in no net positive climate impacts. ExxonMobil intends to take CO2 out of one geologic reservoir (processed at its Shute Creek gas processing facility in Wyoming) and move it through pipelines to a location in Montana where it will re-inject it in another reservoir. The gas processed at this facility is 65% CO2 and only 21% methane, the lowest-concentration methane commercially produced anywhere in the world. Under the implementation of this project, Exxon's methane production would continue producing greenhouse gas emissions while the company rakes in billions of federal tax dollars from sequestering CO2 that otherwise would have remained underground. Over the lifetime of the project, this would increase the total tons of greenhouse gases that Exxon is responsible for with a net harmful impact to the climate. The pipelines that will move the CO2 from one location to another pose severe hazards to those who live nearby and the surrounding environment. Similar pipelines have resulted in explosions and death. Exxon could instead cease operation at the Shute Creek gas processing facility, saving taxpayers $17 billion dollars and directly mitigating 270 million tons of CO2 processed at this facility over the projected 30-year lifetime of the proposed sequestration project. These federal tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. The Environmental Assessment for this project needs to reflect potential hazards for the environment, as well as faulty reasoning for sequestering carbon that is already in the ground.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. In response to public comments received on water quality and related public health during the EA public comment period, the BLM determined analysis was necessary in the EA, and EA Section 3.6 was added to clarify the results of BLM's assessment and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

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86	Individual	This proposal - to construct and operate a CO2 sequestration - would allow for Exxon to use federal tax credits intended to mitigate climate change, but could make ExxonMobil billions of dollars and result in no net positive climate impacts. This proposed project will serve to only move CO2 from one geologic formation to another without actually mitigating the climate harms of CO2 emissions as the tax credit is intended. The pipelines that will move the CO2 from one location to another pose severe hazards to those who live nearby and the surrounding environment. Similar pipelines have resulted in explosions and death. These tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. I strongly encourage you - BLM - TO NOT SUPPORT THIS PROJECT.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. In response to public comments received on water quality and related public health during the EA public comment period, the BLM determined analysis was necessary in the EA, and EA Section 3.6 was added to clarify the results of BLM's assessment and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
87	Individual	Exxon Mobile's proposal to construct and operate a CO2 sequestration project and pipeline in southeast Montana draws on billions of dollars in federal tax incentives that are intended for climate change mitigation, but it will have no net positive climate impacts. The project proposes to pipe CO2 put of it's geologic reservoir at its Shute Creek gas processing facility in Wyoming, in order to inject it into a Montana reservoir. Instead, Exxon Mobile should leave the gas in the Shute Creek reservoir, rather than risking a transfer which could place nearby residents in jeopardy from pipeline explosions. By closing the Sheep Creek gas processing facility instead, Exxon Mobile could prevent millions of tons of CO2 releases and save billions in taxpayer dollars. Thank you for consideration of my concerns.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
88	Individual	I strongly oppose this CO2 "sequestration" project that would make ExxonMobil billions of dollars, with NO net positive climate impact. Exxon will simply take CO2 out of one geologic reservoir and move it to another -- and get massive tax credits for this! Exxon could instead cease operation the Shute Creek gas facility and save taxpayers $17B AND directly mitigate 270M tons of CO2. Tax credits are for climate action which has real impact, not for a loophole/shell game that enriches one company with short-term profits. If some wonder why citizens have so much disgust for government and big corporations -- this is a prime example.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
89	Not Provided	This proposal violates the intent of the law with plans that merely move sequestered carbon and methane instead of the laws intent that all tax credits sequester new carbon and/or methane and BLM should not approve or participating in what may legally be a profitable fraud scheme inconsistent with the intent of the law.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana.
90	Kalur, Jerome	Sequestration is a flawed concept. Exxon is using this idea to make money and to attempt to ward off efforts to curb fossil fuel production. Allowing CO2 sequestration is concept that will not curb global warming and it will deter efforts to curb carbon emissions. It is a have your cake and eat it too concept that the fossil fuel industry has concocted now that their efforts to deny global warming have failed in the face of reality. This project should not be permitted.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
91	Clarke, William	The project in southeast Montana has the potential to sequester over 150 million tons of CO2 with one major asterisk – ExxonMobil intends to take CO2 out of one geologic reservoir (processed at its Shute Creek gas processing facility in Wyoming) and move it through pipelines to a location in Montana where it will re-inject it in another reservoir. The gas processed at this facility is 65% CO2 and only 21% methane, the lowest concentration methane commercially produced anywhere in the world. Under the implementation of this project, Exxon's methane production would continue producing greenhouse gas emissions while the company rakes in billions of federal tax dollars from sequestering CO2 that otherwise would have remained underground. Over the lifetime of the project, this would increase the total tons of greenhouse gases that Exxon is responsible for with a net harmful impact to the climate. In combination with another proposal in Wyoming that would draw CO2 from Exxon's Shute Creek facility, Exxon is poised to rake in $17 billion in federal tax dollars from these two projects which will serve to only move CO2 from one geologic formation to another without actually mitigating the climate harms of CO2 emissions as the tax credit is intended. The pipelines that will move the CO2 from one location to another pose severe hazards to those who live nearby and the surrounding environment. Similar pipelines have resulted in explosions and death.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
92	McLean, Karen	Please know that these tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. Use tax credits to achieve a cleaner environment, not as a way to get around the requirements that need to be met to have a cleaner environment.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
93	Martinez, Steven	I am asking you NOT to approve this project. Why? This is not a true sequestration project. As you know Exxon is moving ALREADY sequestered CO2 from Wyoming to Montana and REINJECTING it. This is a zero gain for the environment but a giant gain for Exxon in the form of billions of federal dollars intended to actually SEQUESTER CO2. This is a Tax payer ripoff and a finger to the climate. To really benefit the climate Exxon could instead CEASE operation of its Shute Creek gas proofing facility, saving tax payers billions of dollars and directly mitigating the release of 270 million tons of CO2 over the projected 30 year life time of the proposed sequestration project.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e. it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
94	Individual	This is a comment on the ExxonMobil Corporation and subsidiary Danbury Inc.'s proposal to allow them to use federal tax credits/money for a CO2 sequestration project in SE Montana. To date and probably till the end of time, CO2 sequestration is not a viable solution to impacting climate aggravating fossil fuels. ExxonMobil is a major player tipping climate change into the environmental disaster column and the federal agencies should not reward them with lucrative contracts. ExxonMobil has a lot of gall to apply for $17 billion dollars of money from taxpayers for moving CO2 from one location to another. If Exxon wants to play a positive role in adverting climate chaos it can transition away from extraction, transportation, processing and burning fossil fuels and turn its attention toward another vocation. Please, please deny this proposal.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

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95	Fischer, Ashley	My name is Ashley and I am a concerned Montana resident. The tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. Scientific America has an article from 2015 investigating that Exxon has known about its effects on Climate Change since 1977. 11 years before the public began to slightly understand its effects. Exxon and other Fossil Fuel companies do not have the best interest of our climate or our people. We have seen this time and time again as mining companies have destroyed our environment and killed our relatives by exposures leading to cancer. As a concerned citizen worried about the world we are leaving our children, I speak against the Tax Credits being used for companies who have knowingly, been creating the crisis our world now faces. They do not get to destroy our world then use loopholes to get tax credit meant for organizations who truly want to reverse the damages done. Let us not forget the major disasters they created, the Exxon Valdez spill in Alaska which prompted the Oil Pollution Act. It's estimated that 250,000 seabirds, 2,800 sea otters, 300 harbor seals, 250 bald eagles, and up to 22 killer whales died along with billions of salmon and herring eggs. They had over 210 spills in 2022 alone and over 480 in 2011. Decades of destruction. These tax credits should go to companies with a past of doing more good than harm for the environment. Companies who clean up these manmade disasters and who are actively working on environmental restoration and biodiversity.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. In response to public comments received on water quality and related public health during the EA public comment period, the BLM determined analysis was necessary in the EA, and EA Section 3.6 was added to clarify the results of BLM's assessment and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. 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Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
96	Patenaude, David	Under the implementation of this project, Exxon's methane production would continue producing greenhouse gas emissions. At the same time, the company rakes in billions of federal tax dollars from sequestering CO2 that otherwise would have remained underground. Over the project lifetime, this would increase the total tons of greenhouse gases that Exxon is responsible for with a net harmful impact to the climate. In combination with another proposal in Wyoming that would draw CO2 from Exxon's Shute Creek facility, Exxon is poised to rake in $17 billion in federal tax dollars from these two projects which will serve to only move CO2 from one geologic formation to another without actually mitigating the climate harms of CO2 emissions as the tax credit is intended. The pipelines that will move the CO2 from one location to another pose severe hazards to those who live nearby and the surrounding environment. Similar pipelines have resulted in explosions and death. Exxon could instead cease operation at the Shute Creek gas processing facility, saving taxpayers 17 billion dollars and directly mitigating 270 million tonnes of CO2 processed at this facility over the projected 30-year lifetime of the proposed sequestration project.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
97	Schulein, Mark	I am writing against this proposed CO2 sequestration project. I feel that this represents a poor use of tax credits without significant impact on climate. Instead of mitigating climate change, this project would really only result in shifting CO2 from one geologic formation to another. I feel this is a misguided use of climate change tax credits and that more impact (and savings to the American public) could be achieved by shuttering the gas plant that is the source of the CO2.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
98	Individual	This appears to be a $ loophole and leaves the environment outcome no better than without it. Moving the C02 from one state to another does not help the planet. Don't do it.	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
99	Bonne, Dee	There are so many reasons why this type of activity is wrong. The potential risks for contamination of water sources, the harmful impacts to habitat destruction on public lands that hurt wildlife, the ridiculous aspects that a huge conglomerate gets to use subsidized taxpayer dollars and write offs to implement these unwanted practices... and the list goes on. When are officials in American going to get this? US citizens do not want this to continue... harming the whole for the wealth of a few is short-term thinking. Do better. Stop this today.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e. it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. Section 3.5 of the EA analyzed impacts to sage grouse and associated habitats. The EA states that at a landscape scale, there would be a net conservation gain of sage grouse habitat. The population is expected to continue experiencing fluctuations and overall decline from existing stressors. The contribution and magnitude of the Project stressors (disruption/disturbance) would be drastically minimized due to the spatial and temporal scale of the phased construction, BLM stipulations, and applicant committed measures in the POD which includes compliance with Governor's EO 12-2015 requirements.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
100	Trice, Wendy	I do NOT SUPPORT THIS PROJECT in any way. To call it a climate solution is absurd. The land it its natural form is a climate sink but not when it has roads through it destroying the water systems as well as the human and wildlife communities who live there. I wish BLM would consider truly sustainable solutions that protect our natural resources - the very ones that provide clear air and water for this country free of charge. No amount of taxpayer money is going to be able to afford to bring back all that we are at risk of destroying. Please please please say NO to this project.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of this analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Table 10-1 of the BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends (2023) lists the average carbon sequestration capacity on a per acre basis that occurs on Federal lands for each state. These data are derived from the USGS's *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14* (2018) report on federal emissions and sinks. The average acre of federal land in Montana sequesters -0.69602 metric tons of carbon per year. For the 46 acres of federal land that would be converted to gravel cover and new two-tracks during Project operation, the Project would result in a loss of capacity to naturally sequester approximately 32 metric tons of carbon per year. Over a 20-year injection period, this equates to 640 metric tons of carbon sequestration, which is significantly less than the 150 million metric tons of CO2 that the Project may sequester. At the end of the project's life, these 46 acres would be reclaimed and the lands' capacity to act as a natural carbon sink would be restored. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)].

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
101	Padgett, Jeff	This project in southeast Montana takes CO2 out of one geologic reservoir (processed at its Shute Creek gas processing facility in Wyoming) and moves it through pipelines to a location in Montana where it will re-inject it in another reservoir. Under the implementation of this project, Exxon's methane production would continue producing greenhouse gas emissions while the company rakes in billions of federal tax dollars from sequestering CO2 that otherwise would have remained underground. Over the lifetime of the project, this would increase the total tons of greenhouse gases that Exxon is responsible for with a net harmful impact to the climate. Exxon is poised to rake in $17 billion in federal tax dollars from these two projects which will serve to only move CO2 from one geologic formation to another without actually mitigating the climate harms of CO2 emissions as the tax credit is intended. The pipelines that will move the CO2 from one location to another pose severe hazards to those who live nearby and the surrounding environment. Similar pipelines have resulted in explosions and death. These tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. This is a cynical manipulation of the tax credit system. I would liken it to receiving tax credit for treating sewage in a particular watershed. The "Exxon loophole" in this case would entail, rather than treating the sewage, transporting it to a different watershed and putting it in the water of that second watershed. Exxon would receive tax credit for cleaning up the water in the first watershed by transporting it to and degrading the water in the second watershed, with no overall increase in water quality, which is the objective of the tax credit. In this case, Exxon could instead cease operation at the Shute Creek gas processing facility, saving taxpayers $17 billion dollars and directly mitigating 270 million tons of CO2 processed at this facility over the projected 30- year lifetime of the proposed sequestration project.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
102	Jansen, Layna	NO - too much damage to land for this project to go through.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
103	Wavrin, Pam	I am opposed to this project. I feel that the environmental risks are too high and the benefits go outside of the community that will suffer the consequences. No, No, NO!	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
104	Greenwood, Ariel	This plan compromises public land, water, range, and wildlife. I oppose this plan.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
105	Canright, Mark	I am a young person who cares about protecting our environment. Thank you for all that you do. I am writing in support of taking serious climate action and sequestering carbon. I am concerned that this proposal would allow for Exxon to use federal tax credits intended to mitigate climate change, but could make ExxonMobil billions of dollars and result in no net positive climate impacts. I think we need to be thoughtful about how we use these tax credits. Let's funnel them into meaningful efforts such as tree planting, land-based carbon sequestration and other regenerative agriculture measures. These tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. Let's work together to truly have a positive impact upon the planet, and invest in	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
106	Individual	Please stop proposing to move CO2 as a ruse to obtain funds from the feds. Unlike some politicians, we are not stupid and see the underhanded scheme that it is.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
107	Individual	From what I've read, carbon sequestration doesn't really work, it's just a diversion. Don't ruin Montana	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
108	Paulick, Ron	I'm not understanding how Federal funds, i.e. my tax dollars, designated for carbon sequestration could legally be used for simply moving carbon from one place to another without sequestrating any carbon. Is this proposal a tax gift to a large, giant, company for a net zero CO2 sequestration?	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of this analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.
109	Mitchell, Andrew	This is an inappropriate project for BLM lands in eastern Montana. The technology is too risky, and potentially dangerous to both the environment and humans, as well is threatening to the Montana ranching culture and industry.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
110	Skelley, Martha	Carbon Capture and Storage is not the solution to our warming planet. I have little confidence that this work can protect local groundwater and surface water, we are at a critical point where much of our ground and surface water is polluted. The land and its ecosystem are vital and valuable resources. We should promote biodiversity not continue to mine/disturb and fracture grassland ecosystems. Let's spend this money on solutions to better grazing management and community led soil health initiatives. Let's get back to the soil and help the Earth repair. As a nation, let's invest millions into that solution. Extracting, pumping and dumping is not a solution to carbon emissions. I reject this plan for the people of Montana and USA.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of this analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
111	de Onis, Catalina	As someone who spent my youth growing up in Montana, and who now has returned to live in this great state as an adult, I am writing in strong opposition to the Denbury, Inc., Snowy River Carbon Sequestration Project. This use of government handouts for technologies that will supposedly "fix" the climate crisis will not do anything to minimize global heating and, in fact, will further practices and support industries that are the major culprits behind the climate crisis (e.g., Exxon Mobil). This Carbon Capture and Storage (CCS) scheme allows for polluters to continue their business-as-usual practices, while pretending they are engaged in "green" practices--this time in the Northern Great Plains. These plains currently function as a way to absorb greenhouse gas emissions. Additionally, wildlife and human communities rely on this important ecosystem and this project will contaminate the water supply, pollute the air and soil, and disrupt the landscape with unnecessary construction. It is not a defensible action because of the huge environmental risks. Additionally, as previous studies find, the majority of these CCS projects never come to fruition and are a huge waste of money (https://www.iisd.org/articles/deepdive/carbon-capture-not-net-zerosolution#:~:text=In%20the%20United%20States%2C%20despite,government%20incentives%20that%20are%20with drawn.). Please reject this project and pledge to support alternatives that will advance real climate solutions that do not harm our cherished ecosystems and communities.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of this analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. The BLM analyzed impacts to air resources and greenhouse gas emissions, which are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Factoring in the estimated 150 million tons of CO2 that would be sequestered, the Project would result in net GHG emissions of -149,969,153 tons of CO_2e over the life of the Project. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

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112	Individual	From the beginning, geoengineering projects (here of course referring to carbon sequestration) have always been problematic. Hopefully, they will become more safe and successful in the future. This project falls way further onto the problematic side of things. The risks have not been appropriately investigated or detailed, and the actual benefit has yet to be demonstrated. Overall this project seems like a way for a company to use government resources and tax credits to line its pockets while not doing any substantive work to address climate change or CO2 emissions. In fact it seems much more likely that through this process they will make CO2 emissions worse. I hope the BLM does not grant the required permits for this case and will instead look for sequestration projects that will make a difference.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of this analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
113	Millbrooke, Anne	I ask that BLM choose Alternative 1 - No Action. Please deny Denbury's right-of-way permit application for the Snowy River Carbon Dioxide Sequestration Project. Please block this carbon storage project. The proposal raises multiple red flags. The scientific potential of carbon storage is not at issue, but this project raises many issues without satisfactory response to those issues. The use of carbon storage for greenwashing jumps off the pages of this particular proposal. That's the first red flag in this list: Carbon storage encourages the continued release of carbon—after all, it could be captured, so don't worry about whether it is or not, or how it is, etc. And in the case that the carbon is captured and stored, there is no reason to reduce carbon emissions. That rationalization is wrong! But that rationalization seems to be behind this proposal. Build storage capacity so extraction and burning of dirty fossil fuels can continue for the life of the storage project. This proposed project reminds me of how little recycling plastic is done despite all the recycling collection that goes on. Recycling plastic is obviously just greenwashing the fossil fuel industry's continued and increasing production of plastic. That same industry is behind this proposal. We need a solution to carbon pollution, not a greenwashing for private profiteering at the expense of our climate, our public lands, our clean air and water, and our health. An email on 15 March 2024 from Scientific American reinforces that first point: "In the U.S., the oil and gas industries have been pushing the idea that we can still use fossil fuels as long as the carbon dioxide emitted is captured and stored in the ground. They say that this is a key solution to the climate crisis. This is a false promise, writes Naomi Oreskes, historian of science at Harvard University, in this month's issue of Scientific American." The citation for that article is "The False Promise of Carbon Capture " in Scientific American Magazine, Vol. 330 No. 3 (March 2024), p. 80, https://www.scientificamerican.com/article/the-false-promise-of-carboncapture-as-a-climate-solution/.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. The BLM analyzed impacts to air resources and greenhouse gas emissions, which are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Factoring in the estimated 150 million tons of CO2 that would be sequestered, the Project would result in net GHG emissions of -149,969,153 tons of CO_2e over the life of the Project. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

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114	Millbrooke, Anne	The role, training, and funding of both state and federal regulators are unclear.	EA Section 1.0 provides a background on geologic sequestration and EPA regulatory authority under the SDWA for UIC Class VI wells. EA Section 4.2 describes BLM's engagement with federal, state, and local agencies that have regulatory authority. A complete list of agencies and required permits and approvals is provided in POD Section 2.4. The BLM is to respond to Denbury's SF-299 application, to approve or deny the ROW grants under FLPMA. The review process is subject to NEPA and evaluation of the Project's conformance with the 2015 MCFO Approved RMP. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. Project expenses for construction and operation are the responsibility of Denbury and not the BLM. The ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants.
115	Millbrooke, Anne	The project would involve the construction of roads, pipelines, pump station, well pads, electrical lines, and buildings on public lands. This would not only allow one company to use the public lands for the thirty-year lease period but permanently scar the land and degrade the habitat of wildlife and native flora. The lease is 30 years, taking public lands from other and multiple uses. This has the appearance of encouraging dirty energy production for 30 years. That is a bad idea—bad for the land, wildlife, native flora, air quality, water quality, the people of Montana, and for climate warming mitigation.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
116	Millbrooke, Anne	Disturbance of vegetation, soil biome, and wildlife during construction, operation, monitoring, and maintenance, as well as during any restoration of the site. Given the 30-year lease and possible extensions given that 30-years of storage is not a solution to climate warming, this is long-term disruption that would permanently scar the lands as trammeled and transformed by human activity rather than a place for public wildlife and native plants and for the natural storage of carbon.	The Reclamation, Mitigation, and Monitoring Plan in POD Appendix G outlines procedures for re-establishing native vegetation to provide site stability for surface disturbing activities within the ROW areas during construction, reclamation, and post-reclamation activities. The plan includes site-specific BLM-recommended seed mixes, monitoring requirements, and reporting to the BLM during reclamation efforts to ensure BLM standards are met and that disturbances, including but not limited to areas used for grazing and wildlife habitat, are promptly reclaimed. A third-party environmental inspector would be employed to provide oversight, monitor, and report on compliance with the ROW stipulations, permit conditions, and procedures and commitments outlined in the POD and associated appendices during construction and reclamation activities. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Table 10-1 of the BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends (2023) lists the average carbon sequestration capacity on a per acre basis that occurs on Federal lands for each state. These data are derived from the USGS's *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14* (2018) report on federal emissions and sinks. The average acre of federal land in Montana sequesters -0.69602 metric tons of carbon per year. For the 46 acres of federal land that would be converted to gravel cover and new two-tracks during Project operation, the Project would result in a loss of capacity to naturally sequester approximately 32 metric tons of carbon per year. Over a 20-year injection period, this equates to 640 metric tons of carbon sequestration, which is significantly less than the 150 million metric tons of CO2 that the Project may sequester. At the end of the project's life, these 46 acres would be reclaimed and the lands' capacity to act as a natural carbon sink would be restored.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
117	Millbrooke, Anne	BLM and the State of Montana already have too many abandoned wells requiring attention, personnel, and public expenditures. Industry has proven disregard for public health and safety by abandoning these oil and gas wells, the exact number being unknown but estimated to be in the hundreds — 237 abandoned "state regulated wells" in 2023, according to the Billings Gazette. Adding injection wells to the thousands of operating wells in the state would not ease the problem of abandoned, many still polluting, wells. I did not find a number of abandoned well on BLM lands in the state.	POD Appendix H discloses the water and petroleum exploration wells within 1 mile of the Project area surveyed by Denbury. In accordance with 40 CFR §§146.84(c)-(d), petroleum exploration wells with integrity issues would be evaluated and properly repaired during construction of the Project if they have the potential to affect the movement of groundwater between aquifers. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. As stated in EA Section 2.1.1, at the time of abandonment of BLM ROWs, Denbury would obtain any required authorization from the BLM, State, and EPA. All infrastructure and facilities would be removed and disposed of or recycled in approved locations. Re-grading and revegetation of BLM disturbed areas would be completed in accordance to BLM requirements and procedures described in the POD and Appendix G.
118	Individual	No to ExxonMobile conglomerates development on BLM lands in Montana!	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
119	Not Provided	This has not been proven to be effective yet. City folks consume. Rural folks sustain. Let's keep it that way.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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120	Individual	The Snowy River CO2 sequestration project should NOT be approved. Allowing public citizens to read a 228 page EA and related documents that corporate scientists and engineers and BLM experts took years to develop is not real public involvement. Most ordinary citizens do not have the time or expertise to study these documents. A much more effective, long term approach would be to eliminate the producers of CO2. The negative impact of the project's access roads, well pads, bulk lines, flowlines, pump stations and offices on the land and its inhabitants is huge.	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, including the no action alternative (Alternative 1), under which the BLM would not issue ROW grants and the Project would not be constructed. The environmental effects of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e. other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
121	Individual	Producers in Carter County have worked with BLM for many years to follow rules and regulations to best utilize federal acres for grazing. Sage grouse habitat protection, fossil recovery, hunting access, recreational use among the many things they've encouraged and protected. And one big project just throws away the idea of sage grouse protection, puts a huge footprint over known paleontology fields, develops roads and infrastructure that is a detriment to the producers and the environment. Carbon capture success rate is far less than the negative environmental impacts of dust, erosion, effects on historical uses, financial burden on local resources for recovering fossils impacted, etc, etc. all for profit from government tax credits that are supposed to HELP the environment but instead line the pockets of large companies. USDA programs that provide cost share for producers require an environmental assessment before even a post hole can be dug or a pipeline for water can be undertaken. A finding results in a re-route of a project. Getting a permit on BLM for even minimal disturbances by producers who care for the land has been difficult, and yet this project just destroys the notion that BLM gives one little bit about the environment or land they oversee. Entering into the agreement to line the pockets of a few in the name of an unproven and unsuccessful attempt at appeasing one segment of the population is a slap in the face to all of us who have tried to utilize the land and maintain it in prime condition for future generations.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of this analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. Project expenses for construction and operation are the responsibility of Denbury and not the BLM. The ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants.
122	Filipovich, Robert	The Snowy River C02 Sequestration Project DOI-BLM-MT-CO20-2023-0070-EA should not be even considered, much less created. C02 sequestration is analogous to a county dump: put waste in the ground, pay for the "service", then try to forget about it and hope someone else will eventually deal with it. "Sequestration" is a big word that means: Stick your head in the sand. C02 "Sequestration" is the terrestrial equivalent of atmospheric pollution: both disrupt the natural environment's kinetic balance on which all life forms ultimately depend while prioritizing homo economist's private, built, convenient, profitable environment. A gram of prevention is worth a kilo of cure. The IPPC, NOAA, hundreds of citizen organizations, and thousands of authors and scientists have told us that a heating planet -- largely the result of GHG emissions including C02 -- are altering Earth's integrated life forms. "Sequestration" ignores, denies, and makes temporarily profitable the excess C02 already in this planet's soil, waters, and air. Please, reprioritize BLM permitting and deny sequestration of C02.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
123	Individual	These tax credits are intended for impactful climate action, not as a loophole that only helps a corporation see high short-term profits.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
124	Individual	Say no to sequestration. What goes down has to come up somewhere!	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
125	Brooks-Hops, Collette	The infrastructure of gas transport lines is in dire need of repair. They leak at every joint. Explosions are a consideration as well. Natural gas is not safe nor is it a viable alternative to the use of coal and oil. Co2 needs to stay in the ground. Methane needs to stay in the ground! This project is folly! It allows Exon to rake in tax credits while doing zero for climate change mitigation. This project proposes to transport the gas processed at this facility which is 65% CO2 and only 21% methane, the lowest-concentration methane commercially produced anywhere in the world. If this project is tallowed to go forward, Exxon's methane production would continue producing greenhouse gas emissions while the company rakes in billions of federal tax dollars from sequestering CO2 that otherwise would have remained underground. Over the lifetime of the project, this would increase the total tons of greenhouse gases produced by Exxon. What's that going to do for us? What's that going to do for Planet Earth? Gas in the form of CO2 and Methane are the biggest contributors to green house gas emissions and the destruction of our fragile atmosphere. We need to reduce our dependence on gases and support electrification of all utilities. We all live on the same planet. Why do we continue to shoot ourselves in the foot with these proposals that allow big corporations operate on loopholes and ignore the well being of our Earth.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
126	Weber, Sas	I am writing to inform you of my opposition to the Snowy River CO2 Sequestration Project. Over the lifetime of the project, the total tons of greenhouse gases that Exxon is responsible for would actually increase. The project will enrich Exxon and harm the people of Carter County, as well as all residents of this planet. Denbury has already had accidents in their pipelines that have caused injury and death to residents. The idea that Exxon can take CO2 out of a geologic reservoir in Wyoming and move it through pipelines to Montana to put it in another and tell the public they are dealing with their emissions is utter manipulation of the public. We already pay the price of Exxon's grand fabrications that have made their shareholders so very rich. Enough! This plan is underhanded, dangerous, and ill-advised and I am opposed to it. Thank you for considering my opinion.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e. it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
127	Individual	Under the implementation of this project, Exxon's methane production would continue producing greenhouse gas emissions while the company rakes in billions of federal tax dollars from sequestering CO2 that otherwise would have remained underground. Over the lifetime of the project, this would increase the total tons of greenhouse gases that Exxon is responsible for with a net harmful impact to the climate. In combination with another proposal in Wyoming that would provide more CO2 to Exxon's Shute Creek facility, Exxon could rake in $17 billion in federal tax credits from these two projects which will serve to only move CO2 from one geologic formation to another without actually mitigating the climate harms of CO2 emissions as the tax credit is intended. The pipelines that will move the CO2 from one location to another also pose severe hazards to those who live nearby and the surrounding environment. Similar CO2 pipelines have resulted in explosions and death. In fact, Exxon could instead cease operation of the least productive gas field in the country and stop operating its Shute Creek gas processing facility, saving taxpayers $17 billion dollars and directly mitigating 270 million tonnes of CO2 processed at this facility over the projected 30-year lifetime of the proposed sequestration project.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
128	Individual	Thank you for this opportunity to comment on the EA that would allow Exxon to use federal tax credits that are intended to mitigate climate change. Moving sequestered CO2 from one facility to another does not mitigate climate change. These tax credits are intended for actual climate reduction action not as a loophole for a risky transfer activity.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
129	Patenaude, David	These tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. Under the implementation of this project, Exxon's methane production would continue producing greenhouse gas emissions while the company rakes in billions of federal tax dollars from sequestering CO2 that otherwise would have remained underground. Over the lifetime of the project, this would increase the total tons of greenhouse gases that Exxon is responsible for with a net harmful impact to the climate. In combination with another proposal in Wyoming that would provide more CO2 to Exxon's Shute Creek facility, Exxon could rake in $17 billion in federal tax credits from these two projects which will serve to only move CO2 from one geologic formation to another without actually mitigating the climate harms of CO2 emissions as the tax credit is intended. The pipelines that will move the CO2 from one location to another also pose severe hazards to those who live nearby and the surrounding environment. Similar CO2 pipelines have resulted in explosions and death. Exxon could instead cease operation of the least productive gas field in the country and stop operating its Shute Creek gas processing facility, saving taxpayers 17 billion dollars and directly mitigating 270 million tonnes of CO2 processed at this facility over the projected 30-year lifetime of the proposed sequestration project.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
130	Individual	Public funds would be used for this project. I oppose the use of taxpayer money to support a project like this that poses hazards while benefitting a fossil fuel giant. If I did the math right, over the life of the project, Exxon would gain over $12 billion in tax breaks. And if they didn't owe that much, perhaps just for a part of the corporate shell, they would gain the balance in direct payments - This $12 billion while many politicians are saying that social security and medicare are too expensive to continue - which threatens the lives of countless Americans.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
131	Individual	CCS is not a panacea for global warming. It does serve to perpetuate continued reliance on fossil fuels and the associated emissions from drilling, fracking, transportation, storage and use. I urge the BLM not to approve any activity under this EA.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
132	Individual	Please do not allow this sequestration project to proceed. The tax credits are meant to be used on meaningful climate projects, and not in order to make Exxon mobile a lot of money. I would prefer to save the taxpayers money by leaving the CO2 and methane in Wyoming, and not building a huge pipeline to move it here to Montana	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e. it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The Project would use the existing pipeline currently transporting CO2 to Montana for EOR in Power River and Fallon Counties. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
133	Canright, Rebecca	Greetings! I am a young person who cares about protecting our environment, and I support strategies intended to sequester carbon in the ground. I am concerned, however, that Exxon will misuse this opportunity, and they should be funding the project out of their own pocket, not using federal tax credits. The proposal would allow for Exxon to use federal tax credits intended to mitigate climate change, but could make ExxonMobil billions of dollars and result in no net positive climate impacts. They already make a lot of money, and should use it to fund meaningful carbon sequestration. These tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. Let's work together to plant trees and practice other good forms of natural, land-based carbon sequestration. Thank you!	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. Project expenses for construction and operation are the responsibility of Denbury and not the BLM. The ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
134	Individual	I urge you to reject this proposal in SE Montana. These tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. The proposal would allow for Exxon to use federal tax credits intended to mitigate climate change, but could make ExxonMobil billions of dollars and result in no net positive climate impacts. The gas processed at the Wyoming facility is 65% CO2 and only 21% methane, the lowest-concentration methane commercially produced anywhere in the world. Under the implementation of this project, Exxon's methane production would continue producing greenhouse gas emissions while the company rakes in billions of federal tax dollars from sequestering CO2 that otherwise would have remained underground. These two projects which will serve to only move CO2 from one geologic formation to another without actually mitigating the climate harms of CO2 emissions as the tax credit is intended. The pipelines that will move the CO2 from one location to another also pose severe hazards to those who live nearby and the surrounding environment. Similar CO2 pipelines have resulted in explosions and death. Over the lifetime of the project, this would increase the total tons of greenhouse gases that Exxon is responsible for with a net harmful impact to the climate. These tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e. it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
135	Individual	I urge you to reject ExxonMobil Corporation, and its subsidiary Denbury Inc.'s, proposal to construct and operate a CO2 sequestration project and pipeline in southeastern Montana. The proposal would allow for Exxon to use federal tax credits intended to mitigate climate change, but could make ExxonMobil billions of dollars and result in no net positive climate impacts. The project in southeast Montana has the potential to sequester over 150 million tons of CO2, yet, ExxonMobil intends to take CO2 out of one geologic reservoir (processed at its Shute Creek gas processing facility in Wyoming) and move it through pipelines to a location in Montana where it will re-inject it in another reservoir. The gas processed at this facility is 65% CO2 and only 21% methane, the lowest-concentration methane commercially produced anywhere in the world. Under the implementation of this project, Exxon's methane production would continue producing greenhouse gas emissions while the company rakes in billions of federal tax dollars from sequestering CO2 that otherwise would have remained underground. Over the lifetime of the project, this would increase the total tons of greenhouse gases that Exxon is responsible for with a net harmful impact to the climate. In combination with another proposal in Wyoming that would provide more CO2 to Exxon's Shute Creek facility, Exxon could rake in $17 billion in federal tax credits from these two projects which will serve to only move CO2 from one geologic formation to another without mitigating the climate harms of CO2 emissions as the tax credit is intended. The pipelines that will move the CO2 from one location to another also pose severe hazards to those who live nearby and the surrounding environment. Similar CO2 pipelines have resulted in explosions and death. Reject this proposal.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e. it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
136	Carroll, Sharon	Further study of the items mentioned in EA 1.7 (p.8) "Issues Identified but Eliminated from Further Analysis". The claim that "several resources are present within the proposed action area but would not be affected to a degree that detailed analyses are required at this time" are not supported by evidence provided by experts in Water Quality and Aquatics, Wildlife and Habitat, and Geological, Paleontological, and Soil Resources.	As part of the review process, a BLM interdisciplinary team of subject matter experts reviewed the proposed action and considered public scoping comments, internal and publicly available resource data, and baseline surveys completed for the project (see POD for reports). Subject matter expert determined resource issues to be analyzed in detail (EA Section 1.6) or not (EA Section 1.7) in the EA. See Appendix A for a list of document preparers/reviewers and their associated title and resource area. In response to public comments received on water quality and related public health during the EA public comment period, the BLM determined analysis was necessary in the EA, and EA Section 3.6 was added to clarify the results of BLM's assessment and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
137	Montana Wildlife Federation	With the availability of enormous financial incentives for both industry and states, a land rush atmosphere has evolved around carbon sequestration. It has become the new thing for investors, start-ups, and swindlers, reminiscent of the gold rush days of 150 years ago, as the enormous, if not unheard-of, incentives to create investment in every scheme to deal with CO2 by the Administration has rolled out. Along with that comes the responsibility of permitting agencies to ferret out viable projects that genuinely add to a long-term carbon reduction and conclusively demonstrate not just an added value for existing oil extraction. We are not convinced that is the case for the Snowy River Project. There are too many unknowns that need to be addressed and answered. Carbon capture and sequestration (CCS) has been proven inefficient, expensive, and unreliable. CCS increases the fuel requirement for electrical generation by 13-44%, driving up electrical costs for companies and ratepayers, and blowouts can release sequestered CO_2 into the atmosphere, endangering people, animals, and vegetation. The vast build-out of CO2 pipelines and CCS is unprecedented. Still, the capture and storage of CO2 are also uniquely hazardous and unproven–for the hundreds of proposed CCS projects, there is scant information on the technical efficacy of their underground storage units. Because of the many questions concerning carbon sequestration, an EIS that would disclose these unknowns and risks must be completed.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
138	Montana Wildlife Federation	BLM should proceed with an Environmental Impact Statement (EIS) for any analysis of the Snowy River Project. The EIS should be comprehensive and include all of the project's actions, including those for the Class VI Injection wells and other associated activities necessary for this project. An EIS is required when there are "potentially significant impacts," as previously discussed, and this proposal will significantly impact the native sage-grouse population that is local to the area. These species are already in decline due to many ongoing issues. In the meantime, BLM must actively coordinate to resolve the problems causing declines within this population. Other resources, including a high concentration of fossils and high-value paleontological resources, will be severely impacted by this proposed project, and that must be disclosed in an EIS.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA , to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. As stated in EA Section 1.7.5, paleontological resources were considered and a survey was completed for ROWs. A UDP was prepared to ensure proper protocols if something of potential significant interest is discovered. The Plan includes involvement of the Carter County Museum and monitoring of surface disturbing activities by a BLM approved paleontologist. See Appendix T in the POD for Plan details. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. Denbury would also implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
139	Johnston, Jon	I do not think this project is worth the net negative impact to the environment over time. Tax payer dollars should not be used to subsidize this project	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
140	McCutchan, Shelly	My hard work and tax dollars fund you. You exist to serve and protect the lands of our great nation. YOU DO NOT EXIST TO PROFIT FROM THE EXPLOTATION OF OUR LANDS TO BENEFIT LARGE CORPORATE AND PRIVATE INTERESTS. The meetings and information that you have provided for this project have been deliberately inaccessible, purposely vague, and deceitful to our rural community. The Snowy River Carbon Dioxide Sequestration project is not in the best interest of the residents of Carter County. It will adversely affect our agricultural industries and harm our wildlife populations. We will not be a dumping ground for an ethically bankrupt megacorporation. You exist to protect the human and wildlife populations of this area. You have done nothing. You have been deceitful to your fellow neighbors and put the wildlife and lands that you have sworn to protect in harm's way. The BLM KNOWS that this technology has a dangerous track record of pipeline ruptures and is not a real solution to curb climate pollution. Montanans can't afford the costs and risks of the Snowy River CO2 pollution project!	All publicly available materials are posted on the BLM ePlanning project webpage at: https://eplanning.blm.gov/eplanning-ui/project/2026556/510. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.

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141	Individual	I ask that you do not participate in the Snowy River Co2 project, or, that at the very least you extend the comment period so that people have the opportunity to voice their opinions. I feel that this project would be a mistake and would put yet another strain on natural resources when we do not fully know enough about possible long term affects.	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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142	O'Grady, Morgan; Western Environmental Law Center et al.	Prior to any decision to approve or deny this ROW request, BLM must comply with its obligations under NEPA to adequately consider the impacts of this decision. BLM's failure to adequately analyze the full emissions for the Project, the long-term economic viability of the upstream CO2 sources, and the various health and wildlife impacts of the Project, render BLM's analysis deficient under NEPA.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
143	McCutchan, Shelly	Harm to public lands: This project will limit access and degrade public lands used for recreation and that are home to cultural artifacts. We shouldn't turn pristine grasslands into an industrial dumping ground for a megacorporation.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. A cultural resources analysis was completed, and as described in EA Section 3.3.1, 218 cultural sites were identified within the physical APE. All sites were evaluated for their inclusion in the NRHP, and 21 were determined to be eligible for the NRHP. As discussed in EA Section 3.3.3, the proposed infrastructure avoids impacts to all historic properties except for one eligible cultural site, Lone Tree Road. The BLM determined there would be no adverse effects to Lone Tree Road, as the use of the road would not change the historical character of the road. The BLM also developed an AV-APE to determine if the Project and its proposed infrastructure would have a significant impact to the viewshed of the Chalk Buttes TCP. The BLM determined that there would be no adverse effect to the Chalk Buttes TCP viewshed due to the distance from the TCP and the applicant committed visual design measures in the POD. The Montana SHPO concurred that the undertaking will have no adverse effect to historic properties in letters dated October 26, 2023 and October 27, 2023.

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144	Sara Donahoe	Denbury plans to fill in some wetlands in generally arid terrain. Several have questioned whether this project would even accomplish anything, after its carbon footprint and other emissions are considered over the 30 year lease period.	The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. EA Section 3.6 describes that pipelines would be installed under wetlands, streams, and riparian areas using trenchless construction techniques to minimize surface water quality impacts and protect aquatic species habitat. Construction equipment and vehicles would cross three wetlands, approximately 0.1 acres total, on temporary, weed-free wetland mats. See EA Section 3.6 for additional details. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3.
145	Simmons, Patricia	The Snowy Range carbon sequestration project is SCARY! - 30 years of disruption to the environment, wildlife, migration, waterways, plants, trees, nearby recreation and agriculture, the EARTH, with roads galore, deep into the Earth storage of carbon. I am totally against this methodology. There is not enough long-term research, like 30 years from now, you don't know if an Earthquake could occur with the additional pressure, or some other emergency affecting the people and everything else in Eastern Montana.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity.
146	Simmons, Patricia	Some of the carbon sequestration research was done at Montana State University, but have never heard any results, and certainly not over a 30 year period. Stop this waste of money and crisis to the EARTH!	The Department of Energy NETL oversees research and development for CCUS. Past and current research and development projects can be found on https://netl.doe.gov/carbon-management/carbon-storage. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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147	McCutchan Royer, Shantel	Will all of the well logs be public information?	Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Well logs become part of the public record during the EPA's UIC Class VI permitting process. EPA public participation requirements are disclosed in 40 CFR §§124.10 - 124.11.
148	Individual	I am opposed to the CO2 project in Carter County.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
149	Robert and Karen Arpan	You will need a lot more power lines, thus making more traffic and disruption for animals and ranchers.	EA Section 2.1 discloses that Denbury proposed the anticipated powerline in a 100-foot corridor to the northern pump station for analysis purposes only. A separate subsequent ROW would be submitted by Southeastern Electric Cooperative. Denbury anticipates a second transmission line will be required to provide power to Pump Station South, part of the Group 5 facilities. Because of the extended timeframe on the Project to complete Group 5, there may be potential changes to transmission services in the area. As result, a transmission line corridor to Pump Station South is unknown at this time. EA Section 2.1.2 was revised to clarify that adherence to the best practices listed in the Avian Power Line Interaction Committee's Suggested Practices for Avian Protection on Power Lines (Avian Power Line Interaction Committee, 2006) and BLM-requested design features will be addressed in Southeastern Electric Cooperative's ROW application and review process for each electric transmission line.
150	Individual	We are strongly opposed to the Snowy River CO2 Sequestration Project. Our family homesteaded in Carter County before Montana was a state. We don't believe that other people's waste should be brought to this area. All that does is assuage people in urban areas for their guilty participation in polluting the environment. If you were moving the CO2 through the area that's one thing, but you're planning on leaving it there. Our family does not want any kind of waste dumped anywhere in this area.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
151	Individual	I oppose the misguided CO2 "sequestration" proposal in SE Montana that could make Exxon billions at the cost of true climate action. The proposal would allow for Exxon to use federal tax credits intended to mitigate climate change, but could make ExxonMobil billions of dollars and result in no net positive climate impacts. Over the lifetime of the project, this would increase the total tons of greenhouse gases that Exxon is responsible for with a net harmful impact to the climate. These tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
152	Liddell, Chelsea	This project will result in MORE emissions that would otherwise have happened, and should be rejected outright. There is no way that taxpayer money should be used to fund a project that allows EXXON to produce MORE methane ("natural" gas) and emit it into the atmosphere. This is the least efficient gas production facility in the country, so we would be essentially be funding poor engineering to cause additional climate change. In what world does anyone think this is a good idea? Exxon could instead cease operation of the least productive gas field in the country and stop operating its Shute Creek gas processing facility, saving taxpayers $17 billion dollars and directly mitigating 270 million tonnes of CO2 processed at this facility over the projected 30-year lifetime of the proposed sequestration project. These tax credits are intended for impactful climate action, not as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3.

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153	Sara Donahoe	The Snowy River proposal seems like low hanging fruit as far as emissions projects go. A different proposal by Midwest Carbon Solutions to connect around 50 ethanol plants to a sequestration site near Bismarck would require 2000 miles of new pipeline. For Snowy River only 40 miles of new pipeline is needed. Other costs are predictable, and there is no oil or methane to worry about. Denbury can just build it out and fill 'er up. Their costs per ton should be much less than for sequestering CO2 in oil wells and apparently they'll get the same tax credit. Obviously, the BLM doesn't regulate industry or make tax code. The BLM will weigh this proposed use as a matter of public interest with respect to impacts on the land. So, will permitting a 30 year lease for a party that receives its return on investment as tax credits be in our best interests? Please consider that trillions of dollars would be going into the pockets of one corporation, Exxon-Mobil. I suspect the recent doubling of carbon tax credits was a desperate "Hail-Mary" attempt to escape congressional gridlock, and I know for sure that Congress is not Caitlin Clark. There are more issues. If this project is permitted, Ekalaka area residents, their cattle, and wildlife will all have skin in the game. Everyone else will go on their merry way, with no engagement on their part whatsoever. We'll hear on the news that something has been done to fix climate change, so we shouldn't worry about it. Offsetting is a tool and in some cases makes sense. But it's now being marketed to the public in all sorts of ways, to promote commerce and justify fossil fuel consumption. The question is, are we headed towards sustainability, or not? CO2 sequestration can make everyone look good without reduction of methane emissions from leakage, venting, flaring, and abandoned wells. Fixing these problems is dispersed, multi-faceted, involves cash out and multiple parties (or none accountable at alt). Methane emissions need to be fixed to the extent possible, not just offset. Try Googling BP's "Time to Cut Methane Emissions -Federal Regulation will Help". We used to import natural gas from North Africa. Now there is sometimes too much, at the wrong place or the wrong time. I'll give the petroleum industry credit for not following the advice of someone at the AEC, who apparently suggested that nuclear explosions might work well for hydraulic fracturing. The oil & gas industry avoided public acknowledgment of human caused climate change as long as they possibly could, and in California fought to prevent commuter railroads from being built. As with the AEC, it's often the marketing arm that's up to no good. Please consider Denbury's marketing arm in their website, "Cedar Creek Anticline". It says that with EOR, they can use more CO2 to produce a barrel of oil than the oil emits when combusted; that oil produced this way is carbon-negative, and is called "Blue Oil". I don't know if it was tongue-in cheek when they extrapolate to state: "If U.S. EOR production was increased to approximately four million barrels per day, annual U.S. CO2 emissions could be reduced by one million tons per year, about 40 percent of current U.S. CO2 emissions." (Current U.S. EOR production is around 300,000 barrels per day).	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
154	Lingle, Drew	In February 2024, the Bureau of Land Management (BLM) published an Environmental Assessment (EA) to respond to Denbury Resources' Application for Transportation and Utility Systems and Facilities on Federal Lands (SF-299). The EA identified four issues for analysis, impacts to air resources and climate change, impacts to cultural resources, socioeconomic impacts, and impacts to wildlife. The BLM identified a Proposed Action Alternative where Denbury would develop construct, operate, maintain, and eventually terminate infrastructure and federal pore space to allow for the permanent sequestration of 150 million tons of carbon dioxide (CO2). The BLM also identified a No Action Alternative where the agency would not issue the proposed right-of-way or grant access to federal pore space for the proposed project. The agency should finalize the Proposed Action Alternative and issue a finding of no significant impact (FONSI) because it would allow continuation of a project that results in the reduction of the CO2 equivalent of removing 1.6 million cars from the road annually, the socioeconomic impacts of the project outweigh the risk of operating a CO2 pipeline, and of the proposed project would result in a net gain of habitat for the sage grouse.	The BLM acknowledges this comment in support of the Project. Detailed analyses of the site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and wildlife are included in Chapter 3 of the EA.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
155	Lingle, Drew	Denbury's proposed CCS project would result in a considerable CO2 emissions reduction, diversification in the local economy through temporary and permanent jobs, and benefit sage grouse habitat. The project is also unlikely to pose risks to the human population in the area. The Proposed Action Alternative should be selected and a FONSI issued. Thus, allowing Denbury to move forward with its proposed project to construct infrastructure and obtain federal pore space for its CO2 sequestration project	The BLM acknowledges this comment in support of the Project. Detailed analyses of the site-specific resource issues for air resources and greenhouse gas emissions, socioeconomics, and sage-grouse and sage-grouse habitat are included in Chapter 3 of the EA.
156	Martin, April	I stand in opposition to the proposed injection sites by Denbury in Carter county. I believe there is not enough research in very sensitive biological areas such as this to show long lasting damages and results. We are talking about land that barely gets moisture, serves as homes to many endangered animals and will disrupt their dens, nests and living locations. With the limited knowledge of the long term effects on waters and wells it is better to stop this project from going forward now rather than try to mitigate the damage afterwards.. What may have seemed like a good idea is proving to be contentious and half formed, it is wise to listen to the landowners/operates who have been stewarding this land for years.	As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse) and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Denbury has committed to complete all construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to avoid or minimize disturbance to grouse, migratory birds, raptors, and winter big game areas. In addition to restricting construction, drilling, routine maintenance, and reclamation activities, pipeline and injection well operations would be remotely monitored, and operational vehicle traffic for monitoring is expected be up to one vehicle visit per well per day, or less, depending on weather and operation conditions. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW, Denbury would be required to submit verification of the EPA approved UIC permit to the BLM. This would ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Under 40 CFR Part 146 Subpart H, the UIC program regulates all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites. EPA UIC Class VI regulations require CO2 be injected only in aquifers with a higher level of salinity that prevents its use as a drinking water aquifer (a salinity level of greater than 10,000 mg/L total dissolved solids). The CO2 plumes would be vertically confined by low permeability shales and mudstones. Detailed analysis and predictive modeling would be performed as part of the UIC Class VI permitting process to verify the ability of the shales and mudstones to limit the vertical migration CO2 before EPA would approve to inject. The EPA requires "baseline geochemical data on subsurface formations, including all USDWs in the area of review" for Class VI UIC wells [40 CFR §146.82(a)(6)]. As described in POD Section 5.5, Denbury conducted sampling and analysis of groundwater and surface water samples in 2022 and 2023 as part of its baseline characterization program. Potential fluid leakage (e.g., CO2 or formation fluid) to USDWs would be routinely monitored during the life of the Project in accordance with an EPA-approved T&M Plan and MRV Plan as discussed in POD Appendix A. Routine monitoring would include evaluation of elevated concentrations of indicator parameters in surface water, soil, gas, and ambient air samples. An Emergency and Remedial Response Plan, as required under 40 CFR §146.94(a) and approved by the EPA as part of the UIC permitting process, would be implemented to protect USDWs in the event that movement of the injection or formation fluid may endanger a USDW during construction, operation, and post-injection site care periods.
157	DiMarco, Jerry	Sequestration is not a long term, sustainable solution for the health of our climate, our environment or us. Not only should BLM deny this project, you should also walk away from any sequestration project in the future.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
158	Barbour, Liz; J Bar L Ranches	These are the LAST REMAINING wide open spaces of the great American West; a host of history lives here historical Native American lands, the wagon train reenactment that brought people from all over the world, stories of stagecoach lines that ran through this area from Deadwood to Miles City traveled frequently by Calamity Jane, stories of cattle and horse drives from Carter County to Belle Fourche and a thousand others I have yet to hear. Memories and stories are also artifacts- only they're so frequently manipulated by the future. Keep Montana values and lands in tact by respecting our history, valuing our recourses and keeping our untouched, wild spaces free from companies like Exxon Mobil who will destroy it for their benefit and leave our community with the understudied consequences. My community, locally and figuratively, does not want Wyoming's waste. This project continues to feed to source of the problem. No SOLUTION here. An EIS has to be done.	A cultural resources analysis was completed, and as described in EA Section 3.3.1, 218 cultural sites were identified within the physical APE. All sites were evaluated for their inclusion in the NRHP, and 21 were determined to be eligible for the NRHP. As discussed in EA Section 3.3.3, the proposed infrastructure avoids impacts to all historic properties except for one eligible cultural site, Lone Tree Road. The BLM determined there would be no adverse effects to Lone Tree Road, as the use of the road would not change the historical character of the road. The BLM also developed an AV-APE to determine if the Project and its proposed infrastructure would have a significant impact to the viewshed of the Chalk Buttes TCP. The BLM determined that there would be no adverse effect to the Chalk Buttes TCP viewshed due to the distance from the TCP and the applicant committed visual design measures in the POD. The Montana SHPO concurred that the undertaking will have no adverse effect to historic properties in letters dated October 26, 2023 and October 27, 2023 Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. EA Section 1.7.1 has been revised to provide additional information regarding the VRM classes in the Project area and the BLM management objectives for each VRM class. Approximately 88% of the proposed surface ROWs are sited in VRM Class IV areas, and 12% are sited in VRM Class III areas. All aboveground infrastructure would be located in Class IV areas with exception of Injection Well 15, which would be located in a Class III area. The Project would meet or exceed VRM requirements outlined in the 2015 MCFO RMP through the placement of infrastructure along existing disturbances and in VRM Class III and VRM Class IV areas, implementation of the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G), and selection of paint and material colors that blend in with the surrounding landscape (POD Section 5.12). Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
159	Catherin-Sauer, Augusta; Northern Plains Resource Council	The cost on public health is significant, we have questions about the economic considerations and analysis: The Q45 tax credit regulations will be effective in July, new information on the regulation was released in April, how did the Snowy River EA take into account the financial considerations Exxon and Denbury are portraying when this regulation is still being set in place? leading taxpayer advocates, scientists, and community groups sent a letter to IRS Commissioner Danny Werfel demanding stronger oversight of massive tax credits for carbon capture projects that are harming communities and wasting federal dollars. Taxpayers and communities must no longer be forced to subsidize carbon capture and storage without clear, transparent, and accountable results. Nor should communities already most affected by fossil fuel extraction be put at additional risk from these facilities, pipelines, and injection wells.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
160	Buchowiski, Jeffrey	How much CO2 does it take to simulate 1 ONE BBL of oil? One 42 gallon BBLs oil burned produces 0.43 tons of CO2 How much CO2 is being diverted to EOR fields #1 and #2 What is the expected increase in ultimate recovery in fields #1 and #2. How much CO2 used for initial EOR injection is permanently sequestered? If not, explain. What is the estimated cost to sequester one ton of CO2	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. The Project is not an EOR project. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
161	Buchowiski, Jeffrey	The Department of Energy has said that a major factor in CCS is the final cost of sequestering one ton of CO2. The DOE thinks, that to be cost effective, a CCS project cost for sequestration is $100/ton CO2. None of the projects I reviewed came close of meeting this goal. Oxy's Stratos facility estimates initial costs to capture one ton of CO2 at $500/ton, but they think this will fall to $200/ton by 2030. I attended the March 6, 2024 Zoom hearing on the Snowy River Project. I took advantage of the opportunity to ask a question and submitted one. I asked what the estimated cost per ton to sequester CO2 would be. Nobody at the meeting had an answer. At this time I find the projects claim of net-negative emissions is a pipe dream. That all this planned development can not answer a major question about the estimated final cost of CO2 sequestration exposes a major flaw. At this point in time I think the only decision is Alternative 1.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The BLM, in consultation with the Appraisal and Valuation Services Office (AVSO), will determine an appropriate charge for injecting actual amounts of CO2 for sequestration into Federal pore space and use and occupancy of the pore space, as appropriate, on a per unit basis. Air resources and greenhouse gas emissions are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
162	Hunkins, Sarah; Western Organization of Resource Councils	Carbon capture and sequestration (CCS) has been proven inefficient, expensive, and unreliable. CCS increases the fuel requirement for electrical generation by 13-44%, driving up electrical costs for companies and ratepayers, and blowouts can release sequestered CO_2 into the atmosphere, endangering people, animals and vegetation. The vast build out of CO2 pipelines and CCS is not only unprecedented, the capture and storage of CO2 is also uniquely hazardous, and unproven–for the hundreds of proposed CCS projects, there is scant information on the technical efficacy of their underground storage units. We urge BLM to proceed with the utmost caution, research, and analysis when deciding their next steps for this project. Our organizations and members urge BLM to take the following actions: - BLM should choose Alternative 1 - No Action Alternative, which would halt the issuance of the proposed ROW grants in Carter Country, Montana. - BLM should halt the Snowy River Project proposal until additional federal regulations are promulgated and scientific research determines that carbon sequestration at the scale proposed is viable (or not). Agencies continue to fall behind on promulgating regulations that ensure that CCS development does not endanger communities, the environment, and wildlife. Regulations have yet to be promulgated that track CO2 from the point of capture to sequestration. PHMSA, for example, has serious regulatory and scientific gaps which causes the public to have minimal confidence in the safety of the pipelines being proposed through communities and on our national forests and grasslands; PHMSA's current definition of CO2 does not even cover all physical states. PHMSA's proposed Pipeline Safety rulemaking has yet to be released which will implement requirements related to emergency preparedness and the safe transportation of CO2 –BLM should not approve this ROW until these regulations are finalized and implemented. The Pipeline Safety Act has also not been updated in a multiple years and is up for reauthorization–this project approval should not move forward until this is finalized to ensure that PHMSA has the financial backing and resources to promulgate a strong rulemaking. In addition, agencies such as EPA, IRS, and USACE are not prepared for the immense deployment of CCS brought about by the Inflation Reduction Act (IRA), and their rules are insufficient to protect land, water, and the public. We also urge BLM to conduct and collect significant scientific research that proves or disproves the effectiveness of CCS as a climate mitigator. As of now, CCS projects have not proven to be reliable. BLM issued an Instruction Memorandum (IM) in 2022 that outlines the national policy for the Right-of-Way Authorizations for CO2 geological sequestration projects. An IM is not enough, BLM must promulgate a rulemaking that clarifies its jurisdiction and process for approving these projects before considering the approval of the Snowy River proposal.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR Parts190, 195, and 196). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities. If federal, state, and local governments implement new regulations that the Project would be subject to, Denbury would be responsible for compliance with all current regulatory requirements, including any new PHMSA rule(s), at that time. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
163	Hunkins, Sarah; Western Organization of Resource Councils	BLM should require an Environmental Impact Statement (EIS), rather than an EA if the Snowy River Project moves forward. an EIS is required when there are "potential significant impacts". This proposal will significantly Impact drinking water in an already arid and drought-prone region of the state. This proposal will also significantly Impact the native sage grouse population that are local to the area, a species that is already threatened due to oil and gas development in the region. Carter County is also known for its high concentration of fossils, and paleontological research will be severely impacted by This development. We also urge BLM to consider conducting an Environmental life cycle analysis to determine the upstream and downstream impacts This Project poses to the environment and local communities. The undersigned organizations and our thousands of members and communities throughout the state of Montana and across the United States strongly oppose Denbury's proposal.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
164	Axelrod, Joshua; Natural Resources Defense Council	Under the MCFO RMP, all land management decisions must comply with the "baseline plan for managing the MCFO in eastern Montana." Where a proposed activity falls outside the scope of the approved plan, that plan "may be amended," and such amendments are appropriate where "a proposed action [changes] the scope of resource uses" covered by the existing plan. Aside from the potential compliance issues discussed in Section I.a, supra, the MCFO RMP is essentially silent as to use of BLM-managed resources for permanent geologic sequestration of CO2. The concept is only mentioned directly a single time to note acreage where "carbon geo sequestration" is excluded or otherwise limited. Otherwise, CO2 sequestration is only clearly referenced in one other instance, but in relation to enhance oil recovery (EOR), not permanent sequestration. The extent to which the MCFO RMP does not contemplate surface and sub-surface use of BLM managed lands for permanent C02 storage is reiterated in the plan's coverage of the MCFO's "Lands and Realty" program, under which the Snowy River Project is being reviewed. In the MCFO RMP's appended "Biological Assessment," the BLM notes only in passing—and without reference to any approach—that "[t]he impacts of potential climate change would be reduced by sequestering carbon dioxide." The meaning of this sentence is not clear from the plan, but a recent EIS prepared by the MCFO references the Snowy River Project—though with numbers significantly different than those contained in the Draft EA—noting that over a 20-year injection time period, the project area has a potential storage [capacity] of approximately 409.5 MMT of CO2 on federal land that would be injected by the 15 proposed wells. This project (if approved) when fully operational would potentially more than offset the total federal GHG emissions from production, transportation, and downstream combustion of MCFO federal coal, oil, and gas through 2038. This would be responsive to the United States' 2050 net-zero goal outlined in Executive Order 14008. Aside from this statement containing a potential storage volume 273 percent greater than the number provided in the Draft EA and the POD, it appears that the MCFO is interpreting the MCFO RMP's comment on CO2 sequestration to mean that projects like Snowy River can be used to offset the greenhouse gas emissions of other potential management decisions, including future coal leasing. Similar to the discussion in the preceding paragraphs, this statement in a recent SEIS continues to suggest that the MCFO RMP does not currently support land use authorizations for permanent geologic storage of CO2, and an RMP amendment process should be undertaken before further consideration of the Snowy River Project is done.	The proposed action, a ROW SF-299 application for use of surface and pore space, is in accordance with the decisions contained in the 2015 MCFO ROD and approved RMP. See EA Sections 1.4 for details. As stated in EA Section 1.5, the proposed action would be required to comply with federal, state, and local regulatory requirements, including BLM ROW regulations (43 CFR Part 2800), terms and conditions, and grant stipulations. Denbury submitted an SF-299 application proposing ROWs (surface and pore space) in Carter County, Montana on BLM lands to sequester CO2 through an EPA UIC Class VI permit. The BLM initiated NEPA with the purpose and need for the action to respond to the pending application requesting ROWs in Carter County, Montana for sequestering CO2 through an EPA UIC Class VI permit in accordance with the 2015 MCFO RMP, FLPMA ROW policies and regulations. Therefore, an RMP amendment is not needed for the proposed action. The MCFO Final SEIS, released for a 30-day protest period on May 17, 2024 and available on BLM ePlanning website, was updated to clarify the total storage potential for the project area is approximately 422 million metric tons of CO2, and Denbury estimated up to 150 million metric tons of CO2 would be injected over a 20-year injection time period. Because the ROW grants were still under review when Draft and Final SEIS were released, this Project was considered for analysis purpose; however, the CO2 that would be stored as a result of the proposed action was not incorporated in the projected emissions. See EIS Section 3.4.3 for details.

165	Axelrod, Joshua; Natural Resources Defense Council	According to the Draft EA, if permitted, drilling activity at the Snowy River Project would commence in 2026 and continue during summer and fall months through the end of 2035. During that period, injection of CO2 would begin, and following completion of all project wells, injection of CO2 would continue for another 20 years. Then, per UIC Class VI injection well regulations, as well as IRS regulations, post-injection and post-abandonment monitoring will be required for at least another 50 years. Given this extraordinary project timespan, the BLM should have significantly expanded its environmental effects analysis to address, at minimum, the following questions: - What effect on surface level resources will changing intensities and types of use have over the next century? - Will the necessity for long-term surface monitoring and regular human presence create additional, unanalyzed impacts on threatened and endangered species present within the project area? - Based on established science and existing data, what environmental changes are likely to occur in the project area that may impact surface level resources and operations? For example, to what extent will changes expected due to climate change further exacerbate the expected environmental impacts of the project, necessitating new or different avoidance or mitigation measures? - What risks may be present in the environment that could increase the likelihood of accidental releases of CO2 from project infrastructure, especially risks tied to changing environmental conditions (i.e., drought, flooding, higher temperatures, etc.) over the next century? This type of analysis is wholly missing from the BLM's analysis of this project and would be best facilitated in an EIS.	ROW grants can be renewed through an application process as long as the holder is in compliance with the terms and conditions of the grant (43 CFR §2807.22). The BLM would review a ROW renewal using current data and land use plan decisions at that time. Therefore, a ROW holder may request renew the ROW grants prior to their expiration. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. EA Section 4.2 discloses coordination with USFWS and compliance with ESA Section 7. Based on the May 4, 2022 letter, the USFWS indicated that additional efforts for protected butterfly species (Dakota skipper) would not be needed for the Project. However, for the NLEB, the BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on NLEB. It is within the scope of the BLM's legal authority as the action agency to determine that the action has no effect, and section 7 consultation is thus not required. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. See EA Sections 1.7.4 and Section 4.2, and letter in POD Appendices M and N for additional details and surveys completed. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

166	Axelrod, Joshua; Natural Resources Defense Council	For the BLM's purposes, permitting of the Snowy River Project would be undertaken via the agency's general ROW regulations at 43 C.F.R. Part 2800. These regulations do not contain any specific provisions relating to CO2 pipeline infrastructure or UIC Class VI wells; and, aside from provisions specifically tailored to wind and solar ROWs, they contain only generalized procedural guidelines for project application submission and processing. In the absence of regulations applicable specifically to the Snowy River Project's unique infrastructure, the BLM is seemingly relying on Instruction Memorandum (IM) IM 2022-041, published in 2022, to guide ROW permit decision-making. This is wholly inadequate for a project of this complexity and duration. Furthermore, there is no direct evidence that the Draft EA is being guided by the policy prescription detailed within that lone IM, as IM 2022-041 is not referenced in the draft EA. Compounding matters, the Draft EA is seemingly in contravention of the guidance that is detailed in IM 2022-41. Most critically, IM 2022-041 includes direction to BLM offices that before a UIC Class VI application can be considered, extensive site characterizations must be carried out by the agency in the interest of determining a site's potential suitability. The IM states: The BLM should complete appropriate exploration and site characterization studies, including any mineral potential reports, and review any applicant-prepared characterization studies to determine surface and pore space ownership, geologic boundary limits, and formation impermeability before authorizing CO2 sequestration. This initial work ensures that no physical connections exist between different formations identified for CO2 sequestration. If needed, the BLM may issue short-term, nonrenewable FLPMA Title V ROW authorizations for site testing and characterization studies related to a proposed CO2 sequestration project. If such activities occurred, it is not evidenced in the Draft EA. Rather, the agency (and the public) is reliant on the project proponent's POD, a source document that lacks the required verification from the agency regarding site characterization and suitability. While we believe the absence of legally enforceable the BLM regulations for permanent geologic sequestration projects provide sufficient reason to pause permitting activity on this project at this juncture, we wish to also draw the BLM's attention to various reasons it should consider promulgating such regulations immediately. In brief, we believe regulations should: - Clarify the required geologic characteristics—and the various factors the agency will consider when assessing the geologic characteristics—for siting ROWs for permanent sequestration of CO2. - Outline enforceable protocols for surface and sub-surface monitoring of injected CO2 to ensure both that the CO2 is remaining trapped within expected pore spaces and that no CO2 is finding its way to the surface. Regulations would also allow the agency to set enforceable expectations for instance where injected CO2 does not remain trapped as expected, including procedures for stopping or changing the rate of injection or taking other actions to stop surface leaks. - Provide project proponents with clear direction on how permanent sequestration projects should be sited so as to not interfere with other BLM-managed resources, including those managed under the Mineral Leasing Act and the General Mining Law. - Clarify how the BLM will undertake site characterization and assess the safety and viability of redrilling wells that were previously used "for the extraction of leasable minerals." - Specify appropriate rental rates and areas to which they will apply given that permanent sequestration projects may or may not significantly alter access to and use of federal public lands, but they will require the construction and maintenance of infrastructure that will persist on the landscape for up to a century. - Clarify and formalize the agency's approach to determining the greenhouse gas benefits and/or impacts of a project to ensure that upstream and downstream effects of a project's permitting are considered, especially where those effects may lead to the continued operation of a facility with significant greenhouse gas emissions that the project may or may not mitigate. - Ensure that adequate, clearly defined bonding rates are set for permanent sequestration projects that, to the extent possible, account for the full cost of secure well closure and full site remediation at the conclusion of CO2 injection and post-injection monitoring. In addition to a clear need for regulatory clarity and certainty, it is also worth noting that this is the very first UIC Class VI sequestration well project the BLM is reviewing—a fact that suggests that the caution and thoroughness of an	The EA analyzes the proposed BLM ROW, pursuant to 43 CFR 2800 and Title V of the FLPMA, as amended, for use of public lands for a UIC Class VI operation in Carter County, Montana. As stated in BLM IM 2022-041, Title V of FLPMA and its implementing regulations, 43 CFR 2800, authorize the BLM to issue ROWs to geologically sequester CO2 in federal pore space, including necessary physical infrastructure and for the use and occupancy of the federal pore space itself. Denbury included surveys for resources (e.g.. water, wildlife, vegetation, cultural, etc.) in the Project area as part of the POD in respective appendices. Denbury also included an initial site characterization description of the area geology, storage intervals, sealing formations, faulting and seismicity using publicly available data. See POD Section 3 for details. The BLM determined the data provided in the POD was sufficient and no additional data is necessary at this time. The BLM considered that detailed site specific data would be obtained by the proposed stratigraphic well and from each well, which would be incorporated into modeling as part of the EPA UIC Class VI permit. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs.

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See Previous Page	*See Previous Page*	EIS versus the expedience of an EA are especially warranted here. This need is bolstered by information shared by the BLM to local stakeholders during its October 12, 2023 Scoping Meeting, where it suggested that the agency was reviewing five additional "sequestration projects." However, a search of the agency's eplanning website turns up only two proposals in southern Wyoming, neither of which has even begun the scoping phase of permitting. BLM press materials, meanwhile, only share that the BLM has received interest from several project proponents, suggesting that the five additional projects mentioned remain at a very nascent stage of development as compared to the Snowy River Project. The dearth of active applications also means the BLM has a rare window of opportunity to begin this regulatory work to ensure that appropriate guidance and regulations can be crafted before it again faces the task of reviewing and permitting UIC Class VI wells and associated infrastructure.	*See Previous Page*

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167	Gleason, Carolyn; US EPA Region 8	We recommend that the Draft EA include essential descriptions of the Project rather than solely relying on incorporation by reference from the POD. This separation of information on basic project elements between the Draft EA and POD generates confusion for the reader about the scope of the Project and its impacts. A more detailed description of the Project Alternatives would also better inform the impacts analysis presented in the EA. Therefore, we recommend updating the EA as follows: - Disclose the constituents of the CO2 stream according to gas analysis; - Disclose if hydrogen sulfide or other acid gases are present and explain whether there could be a safety or corrosion concern; - Identify and describe any emission points of vented CO2 along the CCA Pipeline and within the Project area; - Define and describe any pump station and compressors and their specifications; - Describe any subsidence or seismicity documented in the area that may be related to oil and gas activities or other similar CO2 sequestration wells; - Identify the pipeline pressure and injection well maximum injection rate and pressure; and - Identify any equipment or necessary features that would be located on the proposed well pads. The inclusion of the above contextual information is important for understanding the potential environmental impacts of the proposed action and proposing effective migration strategies related to the associated facilities.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to provide further clarification of why upstream emissions sources are not included in the analysis. Because the CO2 sources are unknown, the properties of the CO2 stream are also unknown. POD Section 3.2 discloses that the injectate would originate from the Denbury CCA Pipeline, transporting CO2 which has been processed to remove contaminants including water, hydrocarbons, and hydrogen sulfide. Moreover, 40 CFR §261.4(i) states that CO2 streams captured and transported for purposes of injection into an underground injection well are not a hazardous waste, provided certain conditions are met. The CO2 stream must be transported in compliance with USDOT requirements, injection of the CO2 must be in compliance with Class VI UIC well requirements, and no hazardous wastes can be mixed with or otherwise co-injected with the CO2 stream. Both the CO2 generator and the Class VI UIC well owner and operator must certify that the CO2 stream meets these conditions. Moreover, even though the upstream CO2 sources are currently unknown, they would be existing and independent of this Project. As such, they would be subject to regulatory requirements of the EPA and/or states in which they are located, to ensure emissions do not exceed or violate any state or federal air quality standards under the CAA. Therefore, including upstream sources would be out of scope of this EA. EA Section 2.1 describes the Project in detail, including the Project purpose, sequence, detailed and quantitative description of each proposed surface element with maps, and proposed design features, including committed measures, that would be implemented to avoid and minimize impacts. This section describes the pump stations and well pads, including dimensions, proposed structures, fencing, gravel, and paint color. Compressors are not proposed for the Project; therefore, they are not discussed in the description of the proposed action elements. EA Section 2.1 also states that the Project location and subsurface pore space formation were selected based on the low risk of seismic activity in the Project area. EA Section 1.7.5 discloses there are no active oil and gas wells or leases. POD Appendix H discloses the water and petroleum exploration wells within 1 mile of the Project area surveyed by Denbury. It includes plugged and abandoned petroleum exploration wells within the Project area that were inspected in 2022. In accordance with 40 CFR 146.84(c and d), petroleum exploration wells with integrity issues would be evaluated and properly repaired during construction of the Project if they have the potential to affect the movement of groundwater between aquifers. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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168	Johnston, Myron and Melissa	My biggest issue with BLM not having an Environmental Impact Survey completed for the Snowy River Carbon Dioxide Sequestration project is that it is supposedly to help the environment. If this is the true case an Environmental Impact Survey is the first thing that should have been done. Failure to have one done is proof that this project is not about helping the environment.	An EA has been completed for this Project. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
169	Johnston, Myron and Melissa	I also understand that there is a large sum of tax payer money that could be given to this project. I would like to think that the environment instead of money was the driving force of this project, but it does not seem that way. I am old enough to remember when paper bags were the main threat to the environment and plastic bags were the solution. I think we all know how that turned out. My conclusion is that anyone profiting financially or politically from global warming legislation is the problem with the environment and they will never be a part of the solution.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
170	Individual	There are too many unknowns for this project to proceed. We do not know how it will affect ground water, how extra pressure in the earth will behave, how it will affect sage grouse and other wildlife, the footprint of heavy equipment out on two track roads, our communities, our land values. It is incredibly irresponsible and wrong for our government to be pushing this on the people and open spaces of SE Montana. If our government and Exxon spent half of the funds required to learn how to sequester carbon through sound grazing management, wetland restoration and other natural processes we'd all be much better off. As a rancher and someone who cares about our rural communities and the well being of these landscapes, I'm very against this project.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Table 10-1 of the BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends (2023) lists the average carbon sequestration capacity on a per acre basis that occurs on Federal lands for each state. These data are derived from the USGS's *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14* (2018) report on federal emissions and sinks. The average acre of federal land in Montana sequesters -0.69602 metric tons of carbon per year. For the 46 acres of federal land that would be converted to gravel cover and new two-tracks during Project operation, the Project would result in a loss of capacity to naturally sequester approximately 32 metric tons of carbon per year. Over a 20-year injection period, this equates to 640 metric tons of carbon sequestration, which is significantly less than the 150 million metric tons of CO2 that the Project may sequester. At the end of the project's life, these 46 acres would be reclaimed and the lands' capacity to act as a natural carbon sink would be restored.
171	Hegwer, Lou	Please reconsider the carbon capture, there are several negative aspects to this project-	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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172	Lohrer, Laurie	The project will negatively impact public lands, wildlife, and recreation.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
173	Lohrer, Laurie	COST TOO HIGH All further feasibility study and testing, will be extremely expensive. Despite significant industry and government investment, more than 80% of proposed CCS projects have failed due to high costs, low readiness , and lack of credible financial return. The Snowy River project is a waste of taxpayer money and would only benefit Denbury's financial interests. I urge you to deny Denbury's application for a right-of-way (ROW) permit and to choose Alternative 1 – No Action Alternative.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. Project expenses for construction and operation are the responsibility of Denbury and not the BLM. The ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants.
174	Martin, April	I really do not think this is a good idea	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
175	Rydell, Carol and Robert	We appreciate the chance to comment on the Snowy River CO2 sequestration project planned for Carter County. We do not support the proposal. The right-of-way permit should be denied! The project endangers the people, the water, the wildlife, and the land in the county. Carter County is home to an agricultural way of life, valuable wildlife populations that need to be preserved, and prehistoric and native artifacts. All of those components would be threatened by the project contaminating the water and disturbing the land.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
176	Rydell, Carol and Robert	Furthermore, the project would cost taxpayers soooo much and it would benefit only the company. While sequestration sounds good because it would help take care of a lot of carbon, most carbon sequestration projects have failed and are way too costly. Finally, the company in question--Denbury--does not have a good record of taking care of its pipelines.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.
177	Donofrio, Mac	The project will damage public lands, further shrink at-risk wildlife species populations, ruin recreation, and destroy cultural sites and artifacts.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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178	Kaeding, Beth	The Snowy River CO2 Sequestration Project presents more risks to our communities, working lands, ecosystems, water resources, cultural resources, and wildlife populations than any benefits it might propose. Carbon capture and sequestration (CCS) projects -- despite significant industry and government investment in the billions -- have failed miserably. As of this time, there are also no meaningful regulations that require CCS operations to result in net greenhouse gas emissions. Consequently, the building of this pipeline and the proposal to sequester CO2 on public land in Carter County, is premature. The proposed project will have a negative consequences for landowners and agricultural operations as well as impacts to water quality and quantity. The proposed project will have negative consequences for prairie ecosystems, wildlife populations as well as prairie bird species, which are in sharp decline.	Development of new federal rules, regulations, or policy would be outside the scope of this analysis and would not meet the purpose and need. Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities. If an agency implements a new rule(s) that the Project would be subject to, Denbury would be responsible for compliance with the rule(s). As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
179	Kaeding, Beth	This proposed project would significantly and negatively impact those who live near the proposed CCS development and offers no meaningful benefit to the local community, the environment, or the carbon pollution our world is experiencing.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
180	Vanderbilt, Amy	The Intergovernmental Panel on Climate Change (IPCC: https://www.britannica.com/topic/Intergovernmental-Panel-on-Climate-Change) has estimated that carbon capture and storage would increase the cost of electricity generation by about one to five cents per kilowatt-hour, depending on the fuel, technology, and location.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.

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181	Caspbara, Bp	While carbon sequestration sounds good on paper, this incredibly expensive technology remains unproven, has a track record of dangerous pipeline ruptures, and is more a pipe dream than a legitimate solution to curb climate pollution. This project raises serious concerns regarding well water containment, wildlife endangerment, risks to local livestock operations, and CO2 release from area earthquakes. There is privately owned land in the middle of the sequestration project that needs to be protected. We Montanans worry that this risky project will harm our public lands, our wildlife, recreation opportunities, and important indigenous artifacts. Please deny it.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity.
182	Bruce, Dean	It is NOT right to do anything like you propose to us. I demand that you NOT mess with the land in Carter County. It is ours to use, protect and preserve. It is NOT for ANY private organization to exploit and we will not allow it. I am a Citizen of the United States of America and I reverse ALL my Rights.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
183	Kennedy, Kylee	Thank you for the opportunity to submit comments and to be able to have a voice before such big decisions are made. I would like to begin by stating the Bureau of Land Management's website page mission statement: " The Bureau of Land Management's mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations." It may just be my opinion, but I don't see how running a pipeline, injection wells and all the other infrastructure that the CO2 sequestration project will entail, can help promote and sustain the health, diversity, and productivity of our public lands.	The proposed action, a ROW SF-299 application for use of surface and pore space, is in accordance with the decisions contained in the 2015 MCFO ROD and approved RMP. See EA Sections 1.4 for details. The BLM initiated NEPA with the purpose and need for the action to respond to the pending application requesting ROWs in Carter County, Montana for sequestering CO2 through an EPA UIC Class VI permit in accordance with the 2015 MCFO RMP, FLPMA ROW policies and regulations. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
184	South, Bill	It's a bad idea idea.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
185	Steinmuller, Patti	There is no evidence that storing carbon dioxide in underground rock formations actually works for the short or long term. This project is incredibly expensive with no assurance of a positive return on investment.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.

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186	Bradley, Dorothy	I am appalled that this consideration is even under consideration. It reminds me of the North Central Power Study 50 years ago that proposed immense coal based energy development in eastern Montana, referring to our high plains as an appropriate "national sacrifice area." This has always been a fragile landscape, and enough sacrifices have been made, for which we are still paying the bill. No more. Please. Ever.	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
187	Mackin, Robert	Having worked in Carter County the past 15 years this area is very special community and very careful consideration should be used. Big corporations headed to Cater County probably have more attorneys than Cater County has residents and they are not trying to make a living of the land.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
188	Mick, Carol	I am a Geologist who have worked in industries Petroleum and Mining, and it is about time industry move progressively into a reliable business of providing services without the destruction and irresponsibility of leaving projects in less than returnable state of environmental use. It can be done. Need to assets to develop a cost effect way of extraction and reclamation.	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. Mineral extraction is not part of the proposed action. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
189	Armijo, Knoxann	My family had a ranch on Pumpkin Creek. No way can we pollute and then pipeline poison and dump in our Earth.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.

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190	Gessaman, Kathleen	Common sense has been forgotten when it comes to CO2 - there is no way a gas will stay underground forever. Public money needs to be spent using sustainable farming practices, replacing trees lost to fires or harvesting, and encouraging the public to conserve.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.
191	Graham-Gardner, Rosemary	I am writing to strongly urge the BLM to choose Alternative 1 - No Action Alternative.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
192	Laughlin, Patricia	I am not an expert but this plan fits in the "you've got to be kidding " category. I don't want to pay for that!!	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project.
193	Billau, Robin	I have worked my entire career on clean up projects and know first hand that the potential for significant damage to a fragile environment is likely with these kind of 'great sounding but not really tested projects'. Ultimately clean up will cost our State and its residents money best spent for our needs not trying to impossibly to fix any number of likely bad outcomes from this project.	In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)].
194	Fuglevand, Lester	The project will not have a negative impact on public lands, at-risk wildlife species, recreation, and cultural artifacts.	The BLM acknowledges this comment in support of the Project.
195	Fuglevand, Lester	This project would not negatively impact those who live near the proposed carbon sequestration development. I respectfully urge you to approve Denbury's application for a right-of-way (ROW) permit.	The BLM acknowledges this comment in support of the Project.
196	Gordon, Paula	Just so you know, the subject of what can - MIGHT - happen to Eastern Montana is very, VERY personal with me. My GRANDparents **homesteaded* in North Eastern Montana...in 1915. My entire life, it has been deeply within the living memory - and present concerns - of our ENTIRE family, for whom I speak here. So, I write with the heartfelt hope that that BLM WILL choose !!!Alternative 1 - No Action Alternative!!! when this decision comes before you. Please DENY the right of way permit application. Your act on behalf of Real People - as negatively compared with "corporate predators" will resonate throughout our local communities, as well as respect the L*A*N*D on which both Native Americans and Settlers have lived - and died (my Grandmother had a MISCARRIAGE out there, a death which still rings through our family's present). We IMPLORE you. Stop a sure-disaster before it starts. We are proud people, but BEGGING is justified when it comes to this decision. IF the American (and especially MONTANAN) people really ARE "sovereign" as our Founders told us, we trust you to Hear Us. Thank you in advance...and yes, there's more that you already know that follows. We'll be watching and praying that this DENIAL comes to be.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
197	Kauffman, Barbara	It looks to me like another case of the rich taking advantage of the poor. Deny this.	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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198	Macarthur, Steve	That only hide the real work we need to do to shift from carbon based energy to renewables. I hope you will see through this ploy and respect the people and the communities that will be impacted by this misguided project. Protect Montana and our people. Do not sacrifice our natural heritage of a clean and healthful environment!	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. Therefore, consideration of an alternative that proposes renewable energy (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
199	Rommereim, David H	Please stop this madness for our future generations.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
200	Thomas, Jeanne	Please do not do this. What if this was your backyard or under your house? Would you want this?	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
201	Toubman, Sara	Thank you for extending the comment period for this project. I'm distressed that the BLM is considering allowing injecting toxic waste into our grasslands and polluting our ground water. Plus Dennby has a bad reputation concerning accidents that have resulted in health problems and pollution. Please decide to not allow such problems in our beautiful state.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirement, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.

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202	Hoem, Harold	Given the failure rate of other CCS efforts, the risk is too great and the possible consequences too dire for you to approve this proposal. This is another out-of-state company risking our wildlife, our agriculture, our groundwater and our health. Please do not give your approval to this dangerous use of our land and water.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
203	Hoem, Janice	Please do not allow Exxon to do this. They would put Montana's wildlife, land and water at risk. The "success" of these operations has a very low record of success, and Montana should not be Exxon's testing ground.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
204	Aus, Kristin	Thank you for taking public comments on the proposal to pump pollution underground in eastern Montana. Holy cow, this is a terrible idea! Please take Alternative #1 - No Action. This project is absolutely too high risk and not at all likely to be a smart path to follow. Previous CCS projects have mostly failed. The only potential winner here is Exxon and they will not pay for the damage to the people in the area. Please don't use taxpayer money for that.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
205	Gould, Kathleen	This proposal is not a good choice for our communities and state. Our state constitution guarantees our right to clean air and water. Denbury's pipeline rupture in the Powder River country is indicative of future accidents affecting water, air, soil, livestock, wildlife, and those of us in close proximity to these types of projects. Montana isn't a dumping ground for CO2 or any other corporate problem looking for resolution.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.
206	Jennings, Gary	Say no to the right of way permit.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
207	Woodcock, Charlene	Herewith my comments on the proposal to permanently store carbon dioxide in underground rock formations on public land in Carter County. I urge that BLM choose Alternative 1 - No Action Alternative. Please deny the right of way permit application. We know that "carbon capture" is a very costly and still unproven technology. Its longterm consequences cannot be predicted. It does not serve the needs of the rural people whose lives could be greatly damaged by it. Instead, the Snowy River CO2 Sequestration Project endangers our communities, our working lands, and the broader public.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
208	Iverson, Linda	I am writing to comment on the Snowy River Carbon Dioxide Sequestration Project being proposed by a subsidiary of ExxonMobil, Denbury Inc. Denbury is proposing to pipe waste carbon dioxide gas 232 miles from Wyoming oil and gas developments to BLM and State lands in Carter County Montana, where it will drill 15 wells to use for pumping this gas 8000 feet into underground storage. I am in favor of the BLM choosing Alternative 1- No Action Alternative-to deny the right of way permit application.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
209	Mcneal, Ashley	Montana is our home away from home. We love the people and the land, and taking care of each is not mutually exclusive. They are intrinsically tied.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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210	Castleberry, Dane	This project will negatively impact those who live near the proposed carbon sequestration development, please give serious consideration to deny further efforts of Denbury to proceed.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
211	Lunt, Laela	Between the unintended impacts on wildlife and people living near the proposed site, long-term consequences, risk of water pollution and pipe bursts, it is clear that the Snowy River project is a waste of taxpayer money and would only benefit Denbury's financial interests. I beg of you all to deny Denbury's application for a right-of-way (ROW) permit and to choose Alternative 1 - No Action Alternative.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.

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212	Catherin-Sauer, Augusta; Northern Plains Resource Council	These members are concerned about the negative impacts that carbon dioxide sequestration could have on groundwater and surface agricultural operations. Our members urge the Bureau of Land Management (BLM) to take the aforementioned information into account and require an Environmental Impact Statement (EIS) for the project.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.
213	Westbrook, Elaine	Furthermore, we do not want the risk of contamination and exposure on Native American land and agricultural spaces.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
214	Montagne, Joan	The lands with few people are always places to " sacrifice". Eastern Montana does not have to be this place for risky industrialization!	As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
215	Hostetler, Eileen	I grew up in Eastern Montana. I love the land there. It makes me sad to think it could be despoiled.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
216	Decamp, Susan	As usual, Exxon is looking for ways to feed at the public trough and ruin public land for their profit.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
217	Kelly, George	Please no "carbon sequestration " boondoggle on public land.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
218	Lohof Larsen, Rachel	I am concerned that this project is yet another case of corporations who lack natural accounting externalizing the costs of their production upon ecosystem function, biodiversity, and public health in some of the largest intact grasslands (natural carbon sinks when well managed) in the world, please take the time to consider the potential impacts of this project on our natural world and rural communities.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Table 10-1 of the BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends (2023) lists the average carbon sequestration capacity on a per acre basis that occurs on Federal lands for each state. These data are derived from the USGS's *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14* (2018) report on federal emissions and sinks. The average acre of federal land in Montana sequesters -0.69602 metric tons of carbon per year. For the 46 acres of federal land that would be converted to gravel cover and new two-tracks during Project operation, the Project would result in a loss of capacity to naturally sequester approximately 32 metric tons of carbon per year. Over a 20-year injection period, this equates to 640 metric tons of carbon sequestration, which is significantly less than the 150 million metric tons of CO2 that the Project may sequester. At the end of the project's life, these 46 acres would be reclaimed and the lands' capacity to act as a natural carbon sink would be restored.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
219	Villa, Carolyn	Dump sites exist already in barren, areas in the SW. There is no need to use productive agricultural land as another Dump Site. Haul it to New Mexico or Arizona in the desert.	As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
220	Lunt, Laela	I write to urge BLM to choose Alternative 1 - No Action Alternative, and deny the right of way permit application. For so many reasons, that I will outline below, this project is far more harmful than beneficial. There is simply not enough data to support the progression of this project. Furthermore, Denbury & Exxon have already proven to have issues with pipelines bursting; The risks of a new pipeline rupturing are high. We do not have enough data to show that this is not a detrimental risk that the land and those who live on it — primarily the wildlife and livestock. A plan needs to first be in place regarding the actual side effects possible in case of CO2 impacting our lands more than anticipated and over time. This data should include more than one injection site and explore what the impact of 15 will have. We have invaluable animals, communities of people, ecosystems at play… far more factors that require further examination and careful consideration before going through with this project.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
221	Lunt, Laela	Furthermore, throughout this comment period, the people have been fighting a skewed system that is clearly working against them. Advocating for our lands is our duty as Americans who spend our livelihoods working to protect what little purity and beauty we have left. BLM has not allowed our people to rally together and speak freely in the meetings from March. With blocked commenting, the power to sift through the public's questions and decide which you answer, hiding names of those attending the meeting to prevent us from coming together - it saddens me to see how we seem to truly have to fight for ourselves with little to no real chance of being supported. It is most unfortunate.	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.
222	Brainard, Diana	Additionally, pipelines inevitably bring invasive species and frequently pierce aquifers.	As noted in Section 1.7.4 of the EA, Denbury has prepared a comprehensive Noxious Weed Management Plan (POD Appendix J) that meets the 2015 MCFO RMP objectives to prevent the expansion or eliminate the occurrence of invasive, non-native, or noxious weed species within the proposed ROWs. Section 5.10 and Ventenata Survey Report Appendix U in POD discusses the noxious weed inventory, mapping, and control efforts conducted by Denbury.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
223	Individual	As a resident of carter county and former biologist I am not in favor of this project. I do not support it, the risk for us far outweighs rewards and I find it insulting that we are at a point we are basically paying exxon to clean up their own trash. We will fight this and continue to fight this. Firmly against this project as almost every resident in the area is.	The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
224	Courtney, Adam	These actions will be irreversible to our natural resources and will have long standing consequences to the area producers. This proposed project amounts to nothing more than the BLM selling out federal lands and resources that are owned by the citizens to be used as a "dumping grounds" for waste gasses owned by Exxon.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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225	Nyberg, Harvey	I have lived and worked in Montana since 1973 often in Eastern Montana, I do not feel that our state should be treated as a garbage dump for economic benefits in other states and regions. The idea of transferring the waste from oil and Gas production and use in other states to our state is terrible. They create the mess, let them deal with it. Therefore, I am asking that BLM choose Alternative 1 - No Action Alternative. Please deny the right of way permit application.	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
226	Pearce, Ray	Let's just skip all the nonsense talk and terms and get straight to it. Why dump a bunch of waste pollution into a pristine, un-polluted area? This is where the nations food comes from. Idk about you but I don't like to shit where I eat. It's far more logical to put waste pollution in an already polluted area, preferably where food isn't grown. Beneath the cities of New York or Los Angeles or Philadelphia etc. would make much more sense purely from a common sense standpoint. Absolutely nothing is produced in these major metropolitan areas because they are made entirely of asphalt and concrete so why would we not put this pollution beneath an already unusable area instead of creating a new one??	Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
227	Biehl, Deborah	Please Please deny this permit. Why is it that Montana has to be the dumping ground for such harmful waste? We have long experienced the negative and harmful "left-overs" from projects that have enriched out of state entities, and left Montana taxpayers on clean up duty. It isn't safe for people, for the land, and for the environment. Please do what is best for the people of the state, and especially those in Carter County. Deny this permit.	As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
228	Ahnert, Nancy	The impact of CCS goes beyond Montana. Oil companies are using CCS to mislead people to think that they can continue to sell fossil fuels, pretending that CCSs will work. We need to see through this ploy and deny them the opportunity to do damage and also put off what they really need to do.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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229	Myers, Lindsey	It would also cause disruption to the native ecosystems and, as above mentioned cultural artifacts and places. Please deny this application.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
230	Trask, Mick	Don't let the greed of out of state corporations ruin a huge area of rangeland. Lives, livestock and wildlife are all going to be impacted in a negative way.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
231	Thomas, Gregory	Overall, the premise of this proposal is 100% scientifically absurd. I strongly encourage you to read "Apocalypse Never" by veteran environmentalist Michael Shellenberger so you can develop a first-hand understanding and appreciation for whom is really profiting and benefiting from outrageous "green" projects such as this at the direct expense of taxpayers and property owners nationwide.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
232	Hadcroft, James	James K. Hadcroft here. You can be part of the solution.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
233	Heidt, Cynthia	Please stop the Snowy River carbon sequestration project. Need more research and a safe method to transport the carbon.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
234	Saffian, Russ	We must always continue to protect our environment, including our our air, water, soil, and all plants and animals, and human life and health. Nothing should ever be allowed, or done, that would jeopardize what is important to all of us.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
235	Schott, Sandy	Not in Montana!!!	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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236	Smith, Joan	The risks of a new pipeline rupturing are high. The Snowy River project is a waste of taxpayer money and would only benefit Denbury's financial interests. This project would negatively impact those who live near the proposed carbon sequestration facility, and it offers no meaningful benefit to the local community.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
237	Angus, Billy	In my view, Big Oil can go extinct!! Stop wasting our tax dollars on this boondoggle project!!!!!!	The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
238	Holmes, Tim	I'm writing in response to the alarming and reckless project being proposed in eastern Montana by Denbury, Inc., a subsidiary of ExxonMobil, The Snowy River Sequestration project. It would pump 150 million tons of carbon pollution underground, threatening land, water, and livelihoods in Carter County.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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239	Jarussi, Karen	Carbon sequestration sounds, and is, too good to be true. The truth is that the company capturing and storing the carbon will benefit in many ways, while nearby landowners and the community pay the price. The company can either get subsidies or sell carbon credits for the stored carbon. Or they can pipe it to other projects for fracking, which releases more carbon into the air. They then make money selling the newly produced fossil fuels. The end result is that the companies make more money from various diversified sources. the environment still suffers, and taxpayers and citizens pay with degraded and polluted land and air, risks of pipeline ruptures and other consequences. It's a boondoggle, not a sound way to try to solve the impacts of fossil fuel development.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
240	Lohrer, Roger	The project will have a negative impact on public lands, at-risk wildlife species, recreation, and cultural artifacts.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
241	Lohrer, Roger	80% of proposed CCS projects have failed due to high costs, low technological readiness and inadequate research, lack of credible financial & climate return.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.
242	Newton, Seth	Severe undue burden on tax payers. The taxpayer yields no value for their dollars spent on this.	The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
243	Weber, Sas	This idea/proposal ludicrous and dangerous. It would put our communities, working lands, and the broader public in harm's way.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
244	Hildebrand, Brent	I'd just like to comment on the Snowy River request to pump carbon dioxide into underground rock formations on public land in Carter County. Please say no to this permit application. This project just puts too many things at risk: Montanans, the health of public land, our plants and animals we rely on, and our future.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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245	Zackheim, Hugh	I urge BLM to reject the proposed Snowy River CO2 Sequestration Project in Carter County. This project represents the antithesis of the wise stewardship of America's public resources that federal laws, administrative rules, and BLM management commitments require. Rather, approval of the proposal would authorize the destruction of our public resources, severely damaging rangeland ecosystems, recreational and livestock grazing opportunities, land and water quality, groundwater resources, and wildlife habitat. The only beneficiaries would be the investors backing this completely speculative, unproven technology, while 'mining' US taxpayers for huge financial subsidies. For BLM to approve this project would be a complete abrogation of the agency's responsibilities. This is particularly evident in light of the incredible failure rate of 'carbon capture' technology. Instead, BLM must choose Alternative 1 and reject this not-ready-for-primetime proposal.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.
246	Emerson, Lauran	The Snowy River CO2 Sequestration Project would have a negative impact on public lands, wildlife, recreation, and cultural artifacts.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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247	Kuether, Charles	I am writing to ask that the BLM deny the right of way permit application as I believe the proposed Snowy River CO2 Sequestration Project puts the public in harm's way and offers substantial risk to water quality from unproven technology.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
248	Kuether, Charles	I am informed that more than 80% of proposed CCS projects have failed due to high costs, low technological readiness. It appears to me the Snowy River project is a waste of taxpayer money. THE PROPOSED PROJECT APPEARS TO HAVE THE POTENTIAL TO NEGATIVELY IMPACT THOSE WHO LIVE NEAR THE PROPOSED CARBON SEQUESTRATION DEVELOPMENT AND OFFERS NO MEANINGFUL BENEFIT TO THE LOCAL COMMUNITY. I respectfully urge you to deny Denbury's application for a right-of-way (ROW) permit and to choose Alternative 1 - No Action Alternative.	The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
249	Woodcock, Charlene	Carbon sequestration is an unproven and very dangerous way around our need to acknowledge that it is the mining, transport, and burning of fossil fuels that is driving the ever-growing climate crisis and global warming.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.

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250	Brainard, Diana	It's unconscionable to ask taxpayers to pay for and to use public lands to clean up problems the fossil fuel industry caused. This expensive, unproven technology has failed over and over. It is the fossil fuel industry promoting false solutions so they can continue operating as usual at the taxpayer's expense. We are in the fight of our lives. If we fail to keep the world below 1.5 degrees of warming, the consequences will be like nothing civilization has ever seen. To win this fight we have to phaseout burning fossil fuel as quickly as we can.	In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.
251	Matson, Gary	It is critical that our society immediately address the climate-degrading effects of greenhouse gas emissions. However, "carbon capture" is unproven and extremely costly. On the other hand, emissions-free renewable electricity generation is immediately available an less expensive than fossil fuel generation. Our efforts as a society must be directed towards solely utilizing renewable energy during this next 20-year period as longer-lasting generation alternatives (enhanced geothermal, nuclear, fusion) are being developed.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Consideration of an alternative that proposes renewable energy (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need.
252	Iverson, Linda	This process of CO2 Sequestration does not guarantee a net climate benefit. The length of time (20years) this project proposes to continuously pump a total of 150 million tons of CO2 into the 110,000 acres of subsurface area on public land allows for the continued use of CO2 for Enhanced Oil Recovery and increased methane gas production. Most of this industry is in Wyoming and does not have economic benefits for Montana. This is the only Carbon Capture and Storage project in the US that is NOT proposed for the area where the energy economy is located.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. Denbury updated POD Section 1.2 to clarify that specific sources of CO2 for the Project have not yet been identified because several stages in the Project sequence, (see Figure 3 in EA Appendix D) will need to occur before contracts with emitters to permanently sequester CO2 are secured. See POD Section 1.2 for additional information.

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253	Iverson, Linda	I believe that the construction of the Snowy River CO2 Sequestration Project will mainly benefit Wyoming's fossil fuel economy, propping up climate polluting industries. Instead, a much needed and more rapid shift away from these climate impacting energy sources should be our focus.	Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. Denbury updated POD Section 1.2 to clarify that specific sources of CO2 for the Project have not yet been identified because several stages in the Project sequence, (see Figure 3 in EA Appendix D) will need to occur before contracts with emitters to permanently sequester CO2 are secured. See POD Section 1.2 for additional information.
254	Steitz, Jim	Carbon capture and storage is a technological mirage that the industry has dangled before legislators and regulators for decades, promising at an indeterminate future date to clean their carbon mess, while continuing to flood our atmosphere with carbon. Any scientifically literate government official should understand that the creation of carbon dioxide is an innate, inexorable aspect of releasing energy from fossil carbon, and that industry lobbyists who promise to capture their carbon are preying on either the scientific illiteracy or knowing cynicism of government officials. Do not lease public land to industry's public-relations charade that burning carbon will one day be compatible with human survival.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details
255	American worried about the climate crisis	I support this proposed carbon storage so long as it is safe, reliable, secure, and done in an environmentally responsible manner. As President Biden has correctly said, the climate crisis poses an existential threat to humanity. There is overwhelming scientific evidence of the severity of this crisis and how it is rapidly getting worse (see the attachment). It is imperative that fossil fuel development and use be phased out as soon as possible. It is also important to store carbon underground when that can safely, reliably, and securely be done. Any accidental releases could be catastrophic. I applaud any progress toward stopping further fossil fuel development and increasing the safe underground storage of carbon. Thank you very much.	The BLM acknowledges this comment in support of the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative.
256	Smith, Amber	The project needs to spend time understanding the impact to rural families, culture and land. While outside development looks at our landscapes as meaningless and worthless due to low population, it is in fact a vibrant ecosystem that supports many people and much wildlife including Sage Grouse, swift fox, pronghorn antelope, mule deer and dozens of grassland birds nesting habitat.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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257	Iverson, Linda	Impacts to the native vegetation and wildlife by all the disturbance is a real concern.	As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse) and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Denbury has committed to complete all construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to avoid or minimize disturbance to grouse, migratory birds, raptors, and winter big game areas. In addition to restricting construction, drilling, routine maintenance, and reclamation activities, pipeline and injection well operations would be remotely monitored, and operational vehicle traffic for monitoring is expected be up to one vehicle visit per well per day, or less, depending on weather and operation conditions. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. The Project would result in minimal surface disturbances. EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Therefore, the BLM does not anticipate that short or long-term disturbances would result in changes to land health standards or other vegetation resource objectives, and thus would not be affected to a degree that detailed analyses is warranted.

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258	Summers, Steve	I live a couple miles from this proposed project on a ranch my great grandfather homesteaded in 1909. I do not think it's a coincidence that one of the most sparsely populated areas in the US was chosen for this pollution experiment. With sparse population comes very important wildlife habitat, habitat that would be absolutely negatively impacted by this project. I know Denbury has found a loophole by securing a conservation easement outside the project, but that's all it is. It won't actually offset the damage that will be done by this project.	As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse) and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Denbury has committed to complete all construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to avoid or minimize disturbance to grouse, migratory birds, raptors, and winter big game areas. In addition to restricting construction, drilling, routine maintenance, and reclamation activities, pipeline and injection well operations would be remotely monitored, and operational vehicle traffic for monitoring is expected be up to one vehicle visit per well per day, or less, depending on weather and operation conditions. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. The BLM has formally adopted and implemented the state's approach to analyzing disturbance as outlined in EO 12-2015 Attachments D (Stipulations for Uses and Activities) and H (Definitions). The Program completed an HQT analysis for the Project and three compensatory mitigation sites. EA Section 3.5.1 was revised to include additional context on the Program's GIS-based HQT that consists of a three-level assessment to quantify the loss or gain of habitat function over the life of development and conservation projects. For conservation projects, credits are created through preservation, restoration, enhancement, and/or permittee-responsible mitigation projects, and are based on the functional acres gained or preserved. This function-based approach, in which debits and mitigation credits relate directly to the quality of the affected habitat function, standardizes the accounting of habitat gains and losses. Compensatory mitigation for habitat loss is not based solely on the affected acreage, but the quality of the affected habitat. Additional information about the HQT is published in the *Montana Mitigation System Habitat Quantification Tool Technical Manual for Greater Sage-Grouse* available at https://sagegrouse.mt.gov/documents/HabitatQuantificationToolTechnicalManualv1.1. In its letter dated September 11, 2023, the Program concluded that the proposed activities that are presented in Denbury's Greater Sage-Grouse Mitigation Plan (POD Appendix I), including the use of compensatory mitigation credits, are consistent with the Montana Sage Grouse Conservation Strategy.
Geology	-	-	-
259	Ogdin, Dustin; Northern Plains Resource Council	Further study, testing, and research to determine if the geology and other site characteristics are appropriate for this project would be extremely expensive given the many risks involved. Despite significant industry and government investment in the technology, more than 80% of proposed CCS projects have failed due to high costs, low technological readiness and research, and overall lack of credible financial and climate return. The Snowy River project is a waste of taxpayer money and would only benefit Denbury's financial interests.	The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.

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260	Carroll, Llane; Harmon Creek Cattle LLC	The EA assumes a satisfactory result of the stratigraphic test well establishing a UIC class VI well. The unknown characteristics of the deep geologic formations raises questions as to how the CO2 will remain in supercritical status. Before accepting and implementing alternative two it would be better to have a working knowledge of underground pore space and the suitability of aquifers if they exist.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details.
261	Carroll, Llane; Harmon Creek Cattle LLC	Due to the projected long life of the POD, it does not appear that the EA addresses additional precautions that would seem prudent to implement for near surface pipelines transporting a highly caustic material in an environment known to have a high degree of heaving and shrinking. This soil movement could lead to pipeline failures. Denbury's CO2 pipeline in the Belle Creek area has had a number of ruptures which have led to large cave-ins.	BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

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262	Carroll, Llane; Harmon Creek Cattle LLC	The EA does not address the existing ancient methane seeps that are found throughout the POD. These methane seeps have the potential to become conduits for the high pressure CO2 finding seams in the pore space and rising to the surface.	In addition, as noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. The CO2 plumes would be vertically confined by low permeability shales and mudstones. See POD Section 3.3. for details on the trapping mechanisms of injected CO2. POD Appendix H discloses the water and petroleum exploration wells within 1 mile of the Project area surveyed by Denbury. In accordance with EPA UIC Class VI regulations, 40 CFR 146.84(c and d), petroleum exploration wells with integrity issues would be evaluated and properly repaired during construction of the Project if they have the potential to affect the movement of groundwater between aquifers. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details.
263	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Center for Biological Diversity et al.'s comment letter on the scoping period for this Project explained that carbon capture operations can both induce seismicity and be impacted by seismic activity. Even Denbury's Plan of Development admits that there is "some evidence" of faulting in the Project area. Yet without explanation, the Draft EA ignores this evidence and offers no analysis of seismic impacts, either induced by the Project itself or the impacts of seismic events on the integrity of Project infrastructure. This is an error. BLM should have conducted its own analysis of seismicity in the Draft EA. Denbury's Revised Plan of Development asserts, on the one hand, that the "faults present in the area are not anticipated to effect" movement of injected carbon, yet admits in the same paragraph that an "iterative process" is needed to gather "[a]dditional information on faults" in order to inform further "simulation models used to predict CO2 movement" and "to verify" that injected carbon will be contained. This guesswork is not sufficient for the purposes of an EA of informing the public and decisionmakers. BLM must work with Denbury to obtain this information and release a revised NEPA analysis so that the public and decisionmakers can consider seismic impacts.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Specifically, the Class VI permit requires the applicant to provide "the location, orientation, and properties of known or suspected faults and fractures that may transect the confining zone(s) in the area of review and a determination that they would not interfere with containment" 40 CFR 146.82(a)(3)(ii) and "information on the seismic history including the presence and depth of seismic sources and a determination that the seismicity would not interfere with containment" 40 CFR 146.82 (a)(3)(v). See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. See POD Section 3.4 for details on faulting and seismicity and Map 3-12 for USGS Seismicity Hazard Map of Montana.

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264	O'Grady, Morgan; Western Environmental Law Center et al.	Finally, BLM fails to analyze the projected plume path of the injected CO2. This analysis cannot be deferred to the Class VI well permit application, as the right of way issuance is a necessary predicate to future injection and represents an irretrievable commitment of federal resources toward the Project's operational phase.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Detailed analysis and predictive modeling would be performed as part of the UIC Class VI permitting process to verify the ability of the shales and mudstones to limit the vertical migration CO2 before EPA would approve to inject. See EA Section 3.6 for additional details.
265	DiMarco, Jerry	The risk of seismic activity should have been discussed as an issue. Injection wells frequently cause earthquakes, so seismic risk should have been included as an issue.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. See POD Section 3.4 for details on faulting and seismicity and Map 3-12 for USGS Seismicity Hazard Map of Montana.

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266	Diestel, Dan	The POD states the targeted storage areas will be deep saline formations. While this is admirable, what happens to the saline water that now resides within the pore space of the mineral grains (see figure 3.5 of the POD). While the EA has no mention of porosity or permeability, the driving force of CO2 injection is pore pressure. Increasing the pore pressure will force CO2 into the pore space displacing the saline water that now resides there. This plume of salt water will be pushed ahead of the CO2 plume and will either travel horizontally or vertically through existing or yet to be developed faults and fissures. Sealing formations of the targeted formations are none porous and impermeable. These sealing formations were created by a natural geological process called "fining upward" which means the finer particles migrate upward. More importantly these siltstone, mudstone and anhydrite rocks are brittle and seismicity will easily fracture them or the increased pore pressure from below could potentially damage them creating a pathway of escape for the CO2 plume. Another pathway for escape is the existing exploratory wells drilled in the vicinity of the project. If these borings/wells were not properly sealed the CO2 could migrate to other formations or the surface. This information could be discovered with a search of MOGC's database yet no mention of it in the EA. Additionally, this database could be used to reveal some pertinent information about the subsurface geology. Water also acts as a lubricant for the movement of the mineral grains themselves. Increasing the pore pressure by injecting CO2 has the potential to increase seismic activity. Science proves that water is concentrated in existing faults. The Ekalaka fault which is the northwestern boundary and the unnamed faults along Boxelder Creek to the east of the project area have the potential to become a corridor of escape for the saline water and the CO2 plume. Denbury's representative Rusty Shaw confirmed this fact at the October 2023 meeting in Ekalaka when he stated the existing faults need further investigation, yet the EA issued since then has not stated the environmental impacts of water and geology. This is not environmental stewardship and runs afoul of the NEPA process. The public including the residents of Carter County relies on BLM to fully evaluate all potential impacts.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details.

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267	Dinstel, Dan	At the Ekalaka meeting on April 30, 2024 Rusty Shaw stated the injection wells would be at 8,000 ft below the surface. This puts the injection into the Madison Formation. The Madison is the aquifer that major municipalities in Montana, Wyoming, and South Dakota draw their drinking water from. Ever been to Lewis and Clark caverns, Wind Cave in the Black Hills, or the big spring at Great Falls? All in the Madison Formation. The Madison is a carbonate formation that has developed these karst features. Karsts are created by dissolving the bedrock creating sinkholes, disappearing streams, caves, and springs. CO2 mixes with H2O to form carbonic acid which dissolves the carbonate bedrocks. Granted the distances from the Snowy River site are a long way from these geological features and wells but let's make sure this project does not impact them by creating an environmental disaster that future generations will pay the price. Considering the geologic impacts; it is easy to dismiss the time factor. This project has a lifespan of 50 years. The Madison Formation was deposited in the early to middle Mississippian time which was 326 to 359 million years ago. The EA and POD states this area was selected because of low seismicity and high porosity. Denbury has not supported the high porosity claim with scientific proof. How can they claim that 150 million tons of CO2 will be sequestered without some scientific proof? Porosity is a quantifiable measurement of voids between the mineral grains. Permeability is the quantifiable measurement of the movement of a low viscosity fluid (such as water or CO2) through mineral grains. But most importantly in geological sequestration is pore pressure. This is how much force is exerted on the fluid. Denbury has failed to state in their POD or EA the amount of pressure that will be exerted on the fluid. Concerning the low seismicity claim by Denbury; did anyone feel the earthquake on May 9, 2024? It was reported by the USGS as being 5.5 miles from Cascade, MT at a depth of 14 miles. The same day an earthquake happened in West Texas. New Jersey is not a seismic hotspot yet a 4.8 magnitude one happened on April 5, 2024. One could say none of these are seismic active areas, but over the last 350 million years how many earthquakes have happened within the Snowy River's project area? Further investigation or investigation of existing data might quantify this unknown. Again, tying water and geology together, increasing pore pressure has been scientifically proven to impact earthquake swarms. Earthquake swarms are elevated seismic events over time without a mainshock. The primary cause of earthquake swarms is a low viscosity fluid (water and CO2) interacting with faults. This project is bounded on 2 sides by known faults that are mapped by USGS. As stated previously, water acts as a lubricant as well as concentrating in faults. The state of Pennsylvania banned fracking due to earthquake swarms. Both fracking and geological sequestration use fluids to increase pore pressure in the targeted formation. The Denbury Engineer that spoke at the Ekalaka meeting on April 30, 2024 stated they have lots of experience with injecting CO2 due to their history of Enhanced Oil Recovery operations. This is not a true statement because Geological CO2 sequestration and EOR have 2 completely different outcomes. EOR uses CO2 to displace the oil between the mineral grains and pump it to the surface while sequestration pumps CO2 from the surface into the mineral grains replacing the existing fluids. In conclusion, because of the foreseeable direct, indirect, and cumulatively negative significant impacts of the issues discussed today I humbly request that BLM conduct a full Environmental Impact Statement.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. See POD Section 3.4 for details on faulting and seismicity and Map 3-12 for USGS Seismicity Hazard Map of Montana.

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268	Hunkins, Sarah; Western Organization of Resource Councils	Seismic events can occur during sequestration, which in turn could cause an earthquake and permanent damage to infrastructure and the surrounding environment. Even Denbury's Plan of Development admits that there is "some evidence" of faulting in the Project area.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. See POD Section 3.4 for details on faulting and seismicity and Map 3-12 for USGS Seismicity Hazard Map of Montana.

269	Axelrod, Joshua; Natural Resources Defense Council	The Snowy River Project proposes injecting CO2 into subsurface pore space that could eventually underly more than 100,000 acres of surface lands. As with any long-term, high-pressure injection plan, the Project raises a number of concerns that should have been presented in a form accessible to the concerned public and other interested stakeholders. Instead, the BLM presents virtually no discussion of the geologic appropriateness of the site, noting only that "information about the geology of the Project area, including details of the storage intervals and sealing formations" are available in the POD. The BLM's lack of work to translate the proponent's geotechnical analysis into plain English means that non-expert stakeholders are left to essentially take the proponent's word that the area is appropriate for permanent geologic storage. While that may be the case, there is mention of at least two major risks that receive no analysis in either the Draft EA or the POD. First, in describing the project area, the Draft EA notes "[a]ll previously drilled wells have been plugged and abandoned" in a paragraph referencing historic oil and gas activity. Second, the Draft EA mentions seismic risks only a single time, noting that the site was selected due to "the low risk of seismic activity." Considering the first concern—historic oil and gas activity—the Draft EA is silent as to the location, timeframe, and extensiveness of this activity. However, abandoned oil and gas wells could pose significant risks to the geologic integrity of the planned injection formation, and more information and analysis of this risk is required. In an EIS, the BLM could address the following key questions and appropriately analyze the risks or effects that the information provided would reveal: - Are there abandoned oil and gas wells located within or near the project area? - When were the abandoned oil and gas wells drilled and when were they abandoned? - What was the depth of the abandoned oil and gas wells? - What drilling and production techniques were used at the abandoned oil and gas wells (i.e., horizontal drilling, hydraulic fracturing ("fracking"), enhanced oil recovery, etc.)? - Are there records of how the relevant oil and gas wells were abandoned and/or have surveys been completed to ensure the continued integrity of the plugged wells? Considering the second concern—seismic risk—history has shown that more information and analysis of this question is needed. As the boom in fracking has proceeded, areas that were previously seismically inactive have seen significant induced seismicity caused not by fracturing itself, but by liquid (wastewater) injection underground. While this project does not involve fracking, it does involve high pressure injection of up to 450 million cubic feet of supercritical (liquid) CO2 per day. Recent reporting from the Permian region and Delaware found that injection of wastewater there is leading to significant surface level deformation. And, in a well-known example of one of the first projects to attempt injecting significant volumes of CO2 for geologic storage, the In Salah project in Algeria deployed numerous monitoring strategies that showed both surface deformation and micro-seismic events attributable to the injection of CO2. While we expect the U.S. Environmental Protection Agency's (EPA) UIC Class VI well permit review to look carefully at these issues, the BLM's attempt to avoid consideration of them here is deeply problematic because of possible impacts to the surface resources the BLM is tasked with managing. Thus, as with issues related to historic oil and gas activity, we urge the BLM to undertake an appropriate level of environmental review in an EIS to address the following questions: - What effect would micro-seismic events have on sensitive species located within the project area, especially GRSG and other identified threatened or endangered species? - What effect would surface deformation have on sensitive species located within the project area, especially GRSG and other identified threatened or endangered species? - What risks does increased seismicity pose to other surface and subsurface resources, especially drinking water and aquifer integrity? - How can the BLM both ensure adequate safety monitoring of the project area while also working to reduce the effect of such monitoring on sensitive species like GRSG and other identified threatened or endangered species? The questions raised here do not fully capture the range of analysis missing from the Draft EA but are meant to illustrate the types of analysis the BLM should have provided in a more robust environmental analysis. We therefore urge the agency to take a harder look at this project and prepare an EIS that considers key geologic risks and effects that this project may present to the area.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. See POD Section 3.4 for details on faulting and seismicity and Map 3-12 for USGS Seismicity Hazard Map of Montana. POD Appendix H discloses the water and petroleum exploration wells within 1 mile of the Project area surveyed by Denbury. In accordance with EPA UIC Class VI regulations, 40 CFR 146.84(c and d), petroleum exploration wells with integrity issues would be evaluated and properly repaired during construction of the Project if they have the potential to affect the movement of groundwater between aquifers.

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270	Kaeding, Beth	Without extensive study, testing, and research to determine if the geology and other site characteristics are appropriate for this project for CCS project, it would be foolish to grant approval for this proposed pipeline project.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details.
271	Fuglevand, Lester	Further study, testing, and research to determine if the geology and other site characteristics are inappropriate for this project would be extremely expensive. The Snowy River project is an excellent investment of taxpayer money to reduce CO2 in our atmosphere.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details.
272	Iverson, Linda	There is the risk of leakage of CO2 resulting from earthquakes and no assurance the gas will permanently stay where it is pumped to.	In addition, as noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. The CO2 plumes would be vertically confined by low permeability shales and mudstones. See POD Section 3.3. for details on the trapping mechanisms of injected CO2. POD Appendix H discloses the water and petroleum exploration wells within 1 mile of the Project area surveyed by Denbury. In accordance with EPA UIC Class VI regulations, 40 CFR 146.84(c and d), petroleum exploration wells with integrity issues would be evaluated and properly repaired during construction of the Project if they have the potential to affect the movement of groundwater between aquifers. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details.

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273	Catherin-Sauer, Augusta; Northern Plains Resource Council	Snowy River proposes injection of CO2 into a distributed network of deep wells. Limited information is available on the proposed individual wells, the expected depths, or the formation where the wells will be completed. The potential effects of the combined well network at depth is unknown. Injection of CO2 will increase pressure in the confined formation. Due to the inherent nature of confined units, this increased pressure and displacement of pore water will influence subsurface conditions at long distances (e.g. many miles) away from injection wells. The cumulative influence of CO2 injection on pore water pressures and radius of influence has not been presented in the existing documentation. Evaluation of potential anticipated effects is done through analytical modeling; no modeling has been presented to assess existing or proposed conditions, or potential adverse impacts.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project.
274	Catherin-Sauer, Augusta; Northern Plains Resource Council	Numerous exploratory petroleum borings/wells exist in the area based on a search of the Montana Bureau of Mines and Geology (MBMG) database. The condition of these individual wells is unknown. Improperly abandoned (i.e. sealed) wells have the potential to release CO2 or brines to the surface in response to CO2 injection. The risk of releases from existing deep wells is not addressed in available information. The well inventory only considered wells within one mile of the proposed project boundary. Numerous domestic wells exist outside the 1 mile extent and should be considered especially since effects of CO2 injection have the potential influences well beyond the project surface boundaries.	POD Appendix H discloses the water and petroleum exploration wells within 1 mile of the Project area surveyed by Denbury. In accordance with EPA UIC Class VI regulations, 40 CFR 146.84(c and d), petroleum exploration wells with integrity issues would be evaluated and properly repaired during construction of the Project if they have the potential to affect the movement of groundwater between aquifers. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
275	Catherin-Sauer, Augusta; Northern Plains Resource Council	Similar to the injection well network, the monitoring strategy is not well defined at this time. The ability of the monitoring network to detect adverse impacts is uncertain. More information is required on proposed well depths, formations, modeling of anticipated project influence, and monitoring strategy.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project.

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276	Holzer, Julie	I am very concerned about the injection wells. Denbury has proposed drilling 15 CCS wells on the BLM. It is my understanding they might drill into fracked underground. Horizontal drilling a mile away may have created a fracked line. What if the injected CO2 hits an all ready fracked line? Can we know where the CO2 will go then? Is it possible that the CO2 running through one fracked line meet CO2 from another well and migrate through those empty lines	In addition, as noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. The CO2 plumes would be vertically confined by low permeability shales and mudstones. See POD Section 3.3. for details on the trapping mechanisms of injected CO2. POD Appendix H discloses the water and petroleum exploration wells within 1 mile of the Project area surveyed by Denbury. In accordance with EPA UIC Class VI regulations, 40 CFR 146.84(c and d), petroleum exploration wells with integrity issues would be evaluated and properly repaired during construction of the Project if they have the potential to affect the movement of groundwater between aquifers. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details.
Human Health and Safety Concerns	-	-	-
277	Ogdin, Dustin; Northern Plains Resource Council	Denbury-operated CO2 transport lines have a documented history of dangerous ruptures, including one in Powder River County, MT, causing serious injury to workers and local residents. The risks of a new pipeline rupturing are high, and this could place an undue strain on local EMS services.	As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. EA Section 3.4.3 discloses impacts to public services.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
278	Mccutchan Royer, Shantel	What happens if there is a leak somewhere? What is the response time? What if you can't get to it due to road conditions or weather?	As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirement, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* Pipeline and injection well operations are discussed in POD Section 4.8. All facilities would be remotely monitored and routinely patrolled (aerially). The flowlines and bulklines would be equipped with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed.
279	Individual	In 2020, a Mississippi pipeline owned by Denbury, the company proposing this project, ruptured leading to over 40 hospitalizations and the evacuation of 300 residents. There are also credible reports of ruptures on existing Denbury-operated lines in Montana.	As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
280	Mccutchan Royer, Shantel	"When [CO2] releases from a pipeline, it expands really rapidly. It basically super cools and kills the immediate area," Feit said. "But then, because CO2 is heavier than air, it hugs the ground. So, what you have is a release of a massive plume of gas that, when it comes into contact with animals, including humans, it can asphyxiate and kill them or make them sick, cause all sorts of permanent damage." The gas may also spread wider in flat areas. It is also colorless, odorless and tasteless and only be detected with a CO2 gas detector. This is not something we need in our community. It is complete stupidity to even take the risk of the livestock, wildlife and humans in the area.	As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
281	Mccutchan Royer, Shantel	What happens if there is water in the pipeline. When water and CO2 mix, it forms carbonic acid, which can corrode the pipeline. Will there be measurements in place to keep this from happening? If so what are they? Also will the pipeline be dried out after the water test?	As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. The Hydrostatic Test Plan in POD Appendix L discusses the process that Denbury would use to test pipeline integrity in compliance with 49 CFR Part 195, Subpart J before pipelines are placed into service. Section 3.5 of the Hydrostatic Test Plan explains that pipeline pigs and squeegees would be used to dry the interior of the pipe, and pig runs would be repeated as necessary to remove all free water. If the Denbury Testing Inspector determines that water or water vapor remaining in the test station may cause future operating problems, the test section would be further dried using dehydrated air or other means deemed suitable and necessary by Denbury's inspector.

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282	Individual	In addition, I am concerned about Denbury's track record in safety. They have not been a good neighbor using slipshod procedures and a lack of concern of how their actions impact those nearby. The pipeline rupture in Powder River County was caused because they chose to make the pipe of cheaper materials that were inadequate to withstand the caustic conditions of transporting CO2. These arguments were made during the earlier comment period, but they were largely ignored. I'd like to focus my comments this time on the March meeting. I attended the presentation and disagree with the current conditions listed in the BLM presentation.	BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.
283	Millbrooke, Anne	Is there provision for appropriate management of emergency preparedness and response? What will be the negative impact of all this development on fire danger? (Human activity is the leading cause of wildfires.)	As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
284	Individual	Denbury does not have a good safety record for its projects, as demonstrated by the 2020 CO2 pipeline rupture in Satartia, Mississippi that sickened tens of people and caused the evacuation of hundreds.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
285	Individual	I am also concerned about the safety record of Denbury Pipelines and think it unacceptable to pose risks to residents of the area. I attended a portion of the BLM teleconference. The EPA spokesperson talked of the pipeline safety regulations in place. But unless those regulations and the continuous EPA oversight have been significantly strengthened, they will be inadequate. They were not enough to prevent a Denbury pipeline failure some years ago that sent 40 people to the hospital. And if Donald Trump regains the white house, oversight will probably be nil. It is my understanding that this type of project requires an understanding of the specific geology, and that this work has not been done. On that basis alone I think it completely inappropriate to proceed.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* Denbury included surveys for resources (e.g.. water, wildlife, vegetation, cultural, etc.) in the Project area as part of the POD in respective appendices. Denbury also included an initial site characterization description of the area geology, storage intervals, sealing formations, faulting and seismicity using publicly available data. See POD Section 3 for details. The BLM determined the data provided in the POD was sufficient and no additional data is necessary at this time. The BLM considered that detailed site specific data would be obtained by the proposed stratigraphic well and from each well, which would be incorporated into modeling as part of the EPA UIC Class VI permit.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
286	Not Provided	Has the area been studied for cellular reception across the whole project area? No phone service in an emergency could be catastrophic that far from help.	Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. ROWs would also be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Injection wells would be monitored in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Denbury would prepare a T&MT&M Plan and a Quality Assurance Plan for EPA review and approval during the UIC Class VI permitting process. The T&M Plan must include installation and use of continuous recording devices to monitor injection pressure, rate, and volume [40 CFR §146.90(b)]. The T&M Plan must be periodically reviewed at a frequency no less than once every 5 years to incorporate monitoring data that has been collected [40 CFR §146.90(j)]. Denbury must provide the EPA with semi-annual reports containing the monthly volume and/or mass of the carbon dioxide stream injected over the reporting period and the volume injected cumulatively over the life of the Project [40 CFR §146.91(a)(5)]. As described in Denbury's Emergency Response Plan (POD Appendix W) and in POD Section 7.1, local response officials would be provided training on how to respond to Project-related emergencies, and they would be invited to participate in annual table-top drills. Denbury would manage any incidents using a unified command structure in coordination with applicable federal, state, and local agencies following the National Incident Management System Incident Command System. In the event of an emergency, Denbury would prepare an Incident Action Plan, which would include an assessment of radio requirements and frequencies and radio communications protocols. As required in 40 CFR §146.94, Denbury would prepare a site-specific Emergency and Remedial Response Plan for EPA review and UIC Program Director approval as part of the Class VI UIC Permit application process. Following the EPA's UIC Program Class VI Well Project Plan Development Guidance, the Emergency and Remedial Response Plan would be revisited and revised, as needed, after the initial AoR modeling is completed, after each reevaluation of the AoR, and as needed throughout the life of the Project, including through the Post-Injection Site Care period. The EPA recommends that a variety of site-specific factors, including but not limited to the presence of communities and sensitive populations, should be considered in development of the Emergency and Remedial Response Plan.
287	Montana Wildlife Federation	Serious concerns surrounding this project and operator. There are reports of ruptures in existing Denbury operated lines in Montana and Wyoming. Denbury has a demonstrated history and track record of dangerous or environmentally harmful incidents associated with their projects and poor communication in the aftermath of those incidents. The Snowy River CO2 Sequestration Project poses real risks to the surrounding landowners and community, and Denbury has not proven its ability to mitigate or handle those risks appropriately. The dangers of carbon sequestration include storage leaks that could contaminate groundwater and soil and well failure during injection or blowout that can release large amounts of CO2 into the air and surrounding groundwater. Potential impacts range from increasing water demand for capture to groundwater contamination through leakage or brine displacement. These are all significant environmental impacts that would have major consequences for the surrounding community.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

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288	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	CCS projects are inherently unsafe. As mentioned in our scoping comment on this Project, CO2 pipelines are, in the words of the preeminent national organization that addresses pipeline safety, "dangerous and under-regulated." CO2 gas is odorless, colorless, doesn't burn, is heavier than air, and is an asphyxiant and intoxicant. These properties make CO2 pipeline releases harder to observe and avoid especially as a released plume spreads and migrates well off the pipeline ROW. CO2 pipelines are also more prone to ductile, or "zipper," fractures, than hazardous liquids or natural gas pipelines. These fractures can throw tons of pipe, pipe shrapnel, and ground covering, generating large craters along the failed pipeline. CO2 pipeline leaks pose a potential hazard for people, wildlife, and plants, as "CO2 is denser than air and can therefore accumulate to potentially dangerous concentrations in low lying areas," and "any leak transfers CO2 to the atmosphere." CO2's lack of odor and invisibility also means that it may not be possible for citizens and first responders to determine if they are in a hazard area before they are harmed. While the danger zone for people and wildlife from hazardous hydrocarbon liquid and natural gas pipeline releases is generally measured in feet, the danger zone of impact from CO2 pipelines is measured in miles. Our comment letter presented several examples of the harms—including mortality—CO2 leaks have caused to humans, wildlife, vegetation, and soil systems. These risks apply not only to pipelines, but other infrastructure that transports and injects CO2, such as the 15 injection wells proposed for this Project. CO2 pipeline leaks—including Denbury-operated pipelines—are not uncommon; in fact, on April 3, 2024, a Denbury pipeline leaked in Louisiana, causing a shelter-in-place order. Review of public documents by Healthy Gulf show nine major CO2 pipeline leaks in Louisiana just since 2010. One of these leaks is the well-publicized major rupture in Satartia, Mississippi, which led to many residents being hospitalized or otherwise having to evacuate. BLM can make no rational argument that the Project's foreseeable safety impacts are not "truly significant" (to use the Draft EA's standard) or unforeseeable and unlikely (to use the standard in NEPA.) Transporting and injecting dangerous compressed CO2 is the sine qua non of this Project. Denbury proposes to operate around 40 miles of new CO2 pipelines in order to inject 150 million tons of CO2 over two decades. And these safety impacts will persist beyond the Project's 20-year injection period; the post-injection site care period could last up to 50 years, but the injected CO2 could threaten environmental resources and humans far beyond that. Workers, communities, and recreationalists will be at risk of dangerous CO2 infrastructure. There are five hunting outfitters with special recreation permits within the Project area. Other "ongoing activities in and around the area . . . include livestock grazing, . . . dispersed recreation/hunting, existing ROWs, oil and gas development in adjacent counties, and agriculture on privately owned lands." All of the people involved in these activities—for miles in either direction from any and all of the CO2 infrastructure—are at risk of serious harm or even death from CO2 leaks. BLM cannot credibly claim otherwise and must not arbitrarily ignore this issue in its NEPA analysis.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. 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It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

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289	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Even Denbury's Revised Plan of Development lists "events related to the Snowy River" Project "that could potentially result in an emergency response." These include: • A CO2 release to the atmosphere from any Snowy River Project Facility (pumpstation, well, equipment, or pipeline); • An equipment integrity failure; • A control system failure; • A monitoring system failure; • A natural disaster; • Fluid leakage to an underground source of drinking water or land surface; • CO2 leakage to the land surface. And it is of no moment that "Denbury has prepared an Emergency Response Plan for the Project" describing "how Denbury would address potential emergencies." Rather than disclose and analyze safety and health issues, BLM cites only to this response plan. But Denbury's plan does not absolve BLM of its duty to disclose and analyze the impacts and risks posed by CO2 and these possible "events" to the public in its NEPA analysis. Further, Denbury's Emergency Response Plan does not discuss or address the safety risks posed to wildlife and grazing animals from CO2 leaks. Denbury's proposed Emergency Response Plan is also deficient in several ways. First, Section 3.3.2 says, "Sheltering-in-place is the preferred response to an emergency involving a toxic gas release." Denbury must provide information to support that recommendation for a CO2 leak and address issues such as: what are people to do when their home cannot be sealed rightly (such as trailer homes and barns)? What about areas where there may not be any structures to shelter in (such as recreation areas, grazing lands, etc.)? Further, the plan must address specifics on the unique nature of the Project's CO2 (e.g., will it contain odorants or not), and how that impacts the emergency response.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed.

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290	McCutchan, Shelly	In 2020, a Mississippi pipeline owned by Denbury ruptured, leading to over 40 hospitalizations and the evacuation of 300 residents. There are also credible reports of ruptures on existing Denbury-operated lines in Montana.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.
291	McCutchan, Shelly	Increased traffic on already dangerously over-trafficked and under-patrolled rural roads. The list of valid concerns for the safety of all human and wildlife residents is endless. If this project and others like it are so safe, why are the facilities only being forced on rural agricultural lands? Why not Jackson Hole or the Paradise Valley? Maybe right underneath Denver? We all know the answer to this question. Would this project be considered safe by the BLM without the completion of an ENVIRONMENTAL IMPACT STATEMENT from a third party for the above-mentioned communities? We also all know the answer to that question. No.	Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity.

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292	O'Grady, Morgan; Western Environmental Law Center et al.	Similarly, BLM fails to discuss the risk of pipeline ruptures. Denbury's history makes clear that this is not a speculative threat. BLM may not bypass this analysis by referencing the federal Pipeline and Hazardous Materials Safety Administration's regulatory requirements. Its obligations under NEPA exist independently of those requirements. Nor does BLM address the propensity of plugged wells, which evidently exist within the Project area, to leak. Should BLM grant this ROW, it must require certain safety measures be implemented as part of its duty to mitigate potential impacts. Specifically, BLM must require leak detection technology, automatic shut-offs, and prompt notification of leaks or ruptures to local landowners and communities.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed.
293	Sara Donahoe	I share concerns that area residents have expressed. There is the supercritical CO2 material itself. The site is remote and it could take considerable time to get the right people and equipment there to fix a problem.	As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
294	Mccutchan Royer, Shantel	I heard at the Ekalaka meeting someone mentioned there is methane leaking out of the ground on the site. I didn't catch the whole conversation. Is that a concern why or why not? Has the issue been looked into?	POD Appendix H discloses the water and petroleum exploration wells within 1 mile of the Project area surveyed by Denbury. It includes plugged and abandoned petroleum exploration wells within the Project area that were inspected in 2022. In accordance with 40 CFR 146.84(c and d), petroleum exploration wells with integrity issues would be evaluated and properly repaired during construction of the Project if they have the potential to affect the movement of groundwater between aquifers.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
295	Montana Wildlife Federation	BLM should halt the Snowy River Project proposal until additional federal regulations are promulgated, and scientific research determines whether carbon sequestration at the scale proposed is viable (or not). Agencies continue to fall behind in promulgating regulations that ensure that CCS development does not endanger communities, the environment, and wildlife. Regulations have yet to be promulgated that track CO2 from the point of capture to sequestration. PHMSA, for example, has severe regulatory and scientific gaps, which cause the public to have minimal confidence in the safety of the pipelines being proposed through communities and on our national forests and grasslands; PHMSA's current definition of CO2 does not even cover all physical states. PHMSA's proposed Pipeline Safety rulemaking has yet to be released, and it will implement requirements related to emergency preparedness and the safe transportation of CO2. BLM should not approve this ROW until these regulations are finalized and implemented. The Pipeline Safety Act has not been updated in multiple years and is up for reauthorization. This project approval should not proceed until finalized to ensure that PHMSA has the financial backing and resources to promulgate strong rulemaking. In addition, agencies such as EPA, IRS, and USACE are not prepared for the immense deployment of CCS brought about by the Inflation Reduction Act (IRA), and their rules are insufficient to protect land, water, and the public. We also urge BLM to conduct and collect significant scientific research that proves or disproves the effectiveness of CCS as a climate mitigator. As of now, CCS projects have not proven to be reliable. BLM issued an Instruction Memorandum (IM) in 2022 that outlines the national policy for the Right-of-Way Authorizations for CO2 geological sequestration projects. An IM is not enough. BLM must promulgate a rulemaking that clarifies its jurisdiction and process for approving these projects before considering the approval of the Snowy River proposal.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities. If federal, state, and local governments implement new regulations that the Project would be subject to, Denbury would be responsible for compliance with all current regulatory requirements, including any new PHMSA rule(s), at that time. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.
296	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	First, the Pipeline Safety Trust made clear in its recent report that CO2 pipelines and "dangerous and under-regulated." In fact, PHMSA is set to undertake a CO2 pipeline rulemaking this year to address many of the regulatory gaps. BLM should pause consideration of this Project's ROW application until PHMSA completes its rulemaking.	Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities. If PHMSA implements a new rule(s) that the Project would be subject to, Denbury would be responsible for compliance with the rule(s). As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center, which would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
297	Not Provided	Is Carter County prepared for a large pipeline leak or rupture? Does it require any specialized equipment? Emergency responders in Satartia, for example, relied on breathing apparatuses that cost more than $6,000 apiece that allowed them to rescue people from the carbon dioxide plume. One rescuer who did not use an apparatus eventually collapsed from breathing to much of the gas. That is an unaffordable cost for most rural volunteer fire departments. What happens if there's a CO2 emergency? Is there a specialized hazardous team somewhere near to be called in? How many first responders are in the area that will be available to respond without depleting our resources? What hospital would victims be taken to? Will the hospital staff have specialized training?	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* Under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)].

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
298	Individual	Heres another Denbury co2 pipeline leak story. I believe all of these leaks should be taken into consideration. Why didn't the monitoring system alert Denbury? We keep being told how safe these projects are but we can clearly see they aren't. I'm not going to sit back and ignore the fact that this project is NOT safe, nothing is guaranteed. We don't need to put our county at risk to become another states dump. It wasn't the wail of a siren or the buzz of an emergency phone alert that warned Tanya Richard a pipeline near her home was spewing poison gas. The first hint that something was wrong came from her cats, a motley collection of free-roaming felines that fled her property as the dense cloud of carbon dioxide (CO2) rolled over a rural stretch of southwest Louisiana on April 3. "Normally, I've got six kitty cats out here wanting to be fed when I come home," said Richard, who lives just outside Sulphur, a small Calcasieu Parish town about five miles from Lake Charles. "But they were nowhere to be found. Then I started to notice no cars were passing by. I said, 'Tanya, something strange is going on.'" As it turned out, a 2-foot diameter pipeline at a CO2 pump station about a half mile from Richard's house had ruptured, releasing about 107,000 gallons of the gas, which can cause drowsiness, suffocation and sometimes death. Colorless, odorless, and heavier than air, carbon dioxide can travel undetected and at lethal concentrations over large distances. The CO2 pipeline network is undergoing rapid expansion as companies invest in the booming carbon capture and sequestration market. With this growth come worries that emergency communities may not be prepared or even aware of the potential for dangerous leaks. In the outskirts of Sulphur, local police and firefighters could do little more than set up roadblocks and wait for the pipeline's owner, ExxonMobil subsidiary Denbury Inc., to send repair specialists. Calcasieu Parish issued a shelter-in-place advisory, urging everyone within a quarter mile of the pump station to close doors and windows and turn off air conditioners, but officials relied mostly on social media to convey the warning. The parish narrowed its emergency alert system to phone numbers listed for addresses within a quarter mile of the station. That amounted to about eight homes – four of which were likely unoccupied, according to parish officials. The pump station and pipeline aren't equipped with alarms or other methods of alerting the nearby residents when leaks or other accidents occur. Several residents in the Sulphur say they received no notice of the leak or became aware of it via Facebook posts more than an hour after the gas began to spread. "There should have been alarms, and the whole community should have been notified," said Roishetta Ozane, a community organizer who lives three miles from the station. "I don't trust the system we have at all." the CO2 cloud reached them. "They thought we were dead." James Hiatt, a Calcasieu environmental activist, worries about a worse incident in Sulphur or elsewhere along the pipeline, which runs through several parishes. "These repeated incidents serve as a stark warning," he said. "It's crucial that these risks (aren't) ignored or minimized."	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

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299	Lingle, Drew	Opponents to the project may raise socioeconomic concerns about Denbury's Delhi CO2 pipeline rupture in Sartitia, MS. However, CO2 pipelines in the United States have operated with high levels of safety. According to the Pipeline Hazardous Materials and Safety Administration statistics, CO2 pipeline operators reported only one injury and no fatalities due to regulated CO2 pipelines over the last 20 years. The Sartitia rupture followed a 60-day period where the area received between 17.43 inches to 23.36 inches of rain, an amount significantly above the historical average. Following the rupture, Denbury updated its operating procedures based on federal feedback to prevent similar occurrences from happening. There were also no fatalities from the incident. Because of the proposed project's location in an area with a population density ranging from 0.4 to 1.8 people per square mile, the risk to human life should an incident occur is minimal. Additionally, the average annual precipitation for Carter and Fallon counties from 1981-2010 ranged from 12-16 inches. Despite the EA showing a recent trend in lower precipitation levels in the area, should this turn around it remains exceedingly unlikely that rainfall events such as what occurred in MS would occur in southeastern MT.	The BLM acknowledges this comment in support of the Project. The Project's conformance with PHMSA and USDOT regulations are discussed in EA Section 4.2, and POD Sections 4.2, 4.8, and 7, respectively. The Project's Emergency Response Plan is discussed in EA Section 1.7.1 and provided in POD Appendix W. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity.
300	Catherin-Sauer, Augusta; Northern Plains Resource Council	BLM Improperly Excluded Health and Safety. CCS projects are "dangerous and under-regulated." CO2 gas is odorless, colorless, doesn't burn, is heavier than air, and is an asphyxiant and intoxicant. These properties make CO2 pipeline releases harder to observe and avoid especially as a released plume spreads and migrates well off the pipeline ROW. CO2 pipelines are also more prone to ductile, or "zipper," fractures, than hazardous liquids or natural gas pipelines. These fractures can throw tons of pipe, pipe shrapnel, and ground covering, generating large craters along the failed pipeline. While the danger zone for people and wildlife from hazardous hydrocarbon liquid and natural gas pipeline releases is generally measured in feet, the danger zone of impact from CO2 pipelines is measured in miles.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.

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301	Catherin-Sauer, Augusta; Northern Plains Resource Council	CO2 pipeline leaks—including Denbury-operated pipelines—are not uncommon; in fact, on April 3, 2024, a Denbury pipeline leaked in Louisiana, causing a shelter-in-place order. Review of public documents by Healthy Gulf show nine major CO2 pipeline leaks in Louisiana just since 2010. One of these leaks is the well-publicized major rupture in Satartia, Mississippi, which led to many residents being hospitalized or otherwise having to evacuate. In the recent Louisiana case, an estimated 2,548 barrels of carbon dioxide (CO2) leaked from the Exxon pipeline in Sulphur in Calcasieu Parish on 3 April, triggering an emergency response and alarm among residents. Interviews by the Guardian Newspaper suggest that no pipeline operator was on site at the pump station where the leak occurred – and the camera monitoring the facility was not working. Exxon staff located 50 miles away in Beaumont, Texas, learned about the leak after it was reported to emergency services, the Guardian understands. It took more than two hours for an operator to arrive at the facility and fix the leak, according to the local fire department. Holly McGee, whose family lives opposite the pump station, said she reported the leak to the sheriff's office around 6pm on 3 April – after calls to the company went unanswered. Photographs and video seen by the Guardian show a dense white gas gushing out vertically and horizontally from the pipeline. According to McGee, the leak sounded like a pressure cooker, and smelt like chemicals. Thanks to the windy dry conditions, the leaked CO2 in Sulphur appears to have dispersed without causing any harm to humans or animals. But residents, who are frequently subjected to leaks and other major incidents at the polluting industrial plants, fear that this was down to luck. Transporting and injecting dangerous compressed CO2 is the purpose of this Project. Denbury proposes to operate around 40 miles of new CO2 pipelines in order to inject 150 million tons of CO2 over two decades. And these safety impacts will persist beyond the Project's 20-year injection period; the postinjection site care period could last up to 50 years, but the injected CO2 could threaten environmental resources and humans far beyond that.	As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

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302	Catherin-Sauer, Augusta; Northern Plains Resource Council	Workers, communities, and recreationalists will be at risk of dangerous CO2 infrastructure. There are five hunting outfitters with special recreation permits within the Project area. Other "ongoing activities in and around the area . . . include livestock grazing, . . . dispersed recreation/hunting, existing ROWs, oil and gas development in adjacent counties, and agriculture on privately owned lands." Even Denbury's Revised Plan of Development lists "events related to the Snowy River" Project "that could potentially result in an emergency response." These include: - CO2 release to the atmosphere from any Snowy River Project Facility (pumpstation, well, equipment, or pipeline); - An equipment integrity failure; - A control system failure; - A monitoring system failure; - A natural disaster; - Fluid leakage to an underground source of drinking water or land surface, - CO2 leakage to the land surface. While has an emergency response plan, Denbury's plan does not absolve BLM of its duty to disclose and analyze the impacts and risks posed by CO2 and these possible "events" to the public in its NEPA analysis. Further, Denbury's Emergency Response Plan does not discuss or address the safety risks posed to wildlife and grazing animals from CO2 leaks. Denbury's proposed Emergency Response Plan is also deficient in several ways. First, Section 3.3.2 says, "Sheltering-in-place is the preferred response to an emergency involving a toxic gas release." Denbury must provide information to support that recommendation for a CO2 leak and address issues such as: what are people to do when their home cannot be sealed rightly (such as trailer homes and barns)? What about areas where there may not be any structures to shelter in (such as recreation areas, grazing lands, etc.)? Further, the plan must address specifics on the unique nature of the Project's CO2 (e.g., will it contain odorants or not), and how that impacts the emergency response.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed.

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303	Western Organization of Resource Councils	Carbon dioxide pipelines are also more prone to ductile, or "zipper," fractures, than hazardous liquids or natural gas pipelines.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

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304	Hunkins, Sarah; Western Organization of Resource Councils	Our organizations and members have serious concerns surrounding this project and operator. There are credible reports of ruptures on existing Denbury-operated lines in Montana and Wyoming. At a January community meeting in Ekalaka, a Powder River County, Montana rancher shared about pipeline ruptures that drove him to hire legal representation with a property owners' group. The alleged ruptures occurred in a pipeline system in the ground in the Bell Creek oil field that is on the Giacometto Ranch property; this pipeline system connects to the existing Denbury carbon dioxide pipeline. Denbury has a demonstrated history and track record of dangerous or environmentally harmful incidents associated with their projects, and poor communication in the aftermath of those incidents. The Snowy River CO2 Sequestration Project poses real risks to the surrounding landowners and community, and Denbury has not proven their ability to appropriately mitigate or handle those risks.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
305	Gleason, Carolyn; US EPA Region 8	The Draft EA's elimination of the public safety topic from detailed analysis in Section 1.7 is of significant concern. The NEPA document should include an assessment of potential environmental and health impacts associated with the Project's construction, operations, and a potential pipeline rupture or equipment failure. The rationale for eliminating the public safety topic from further analysis is due to the incorporation by reference of an Emergency Response Plan from Appendix W of the applicant's POD (Draft EA, p. 10). The Emergency Response Plan is an important planning measure but it does not substitute for an analysis under NEPA of the potential adverse environmental and health impacts associated with an unplanned release of CO2. As set forth in the NEPA regulations, the analysis should include reasonably foreseeable impacts, including those that can have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason (40 CFR § 1502.21(d)). We also recommend developing the site-specific Emergency Response Plan detailed on page 55 of Appendix W and making it available as an Appendix to the EA or, at a minimum, evaluating pipeline rupture early detection measures and response times through the NEPA process so that these factors are considered as part of the impacts analysis and determination of the significance of impacts. The colorless, odorless, and dense nature of CO2 presents unique challenges for the Project when it comes to ensuring the preservation of public health through timely detection of and pipeline maintenance or repair needs. In 2020 a rupture of a Denbury Gulf Coast Pipelines LLC CO2 pipeline caused the hospitalization of 45 people and evacuation of 200 people from communities in Yazoo County, Mississippi as CO2 replaced the available oxygen in surrounding low-lying areas. The U.S. Department of Transportation (DOT) incident report on the subject subsequently recommended that Denbury implement broader public engagement efforts to effectively alert emergency responders and members of the public living in low-lying areas of the hazards associated with CO2 pipelines. DOT also directed Denbury to develop more resilient mitigation efforts which address the challenges to the integrity of their CO2 pipelines presented by climate change, geohazards, and soil stability issues.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

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306	Gleason, Carolyn; US EPA Region 8	While the Project proposes to tier its new pipelines off the pre-existing Denbury Cedar Creek Anticline (CCA) CO2 pipeline, its current scope nonetheless generates new points of potential failure through complication introduced by its new joints and new pumping stations. Therefore, we recommend that the Project include resiliency measures in its pipeline maintenance plans which we also recommend describing and stipulating in detail in the NEPA analysis for the sake of transparency and effective public involvement and communication on the hazards associated with these types of projects. The EPA also recommends ROW stipulations to mitigate potential impacts to public health including: - Utilization of monitoring gages, crack arrestors, and relief valves placed at frequent intervals along the pipelines; - Pipeline rupture early detection measures and explicit emergency response time commitments; and - Introduction of chemical odorants to the CO2 to help alert communities to the presence of a leak.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.
307	Pam Castleberry; Carter County	Since the meeting in October, several articles of CO2 explosions etc have been floating around. The public in general is concerned for their safety, some of the proposed wells are close in proximity to families who reside in the area.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.
308	Kaeding, Beth	Finally, the company behind this CCS proposal, Denbury, has a poor safety record and does not have a high-quality construction record.	BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
309	King, Michael	Please choose Alternative 1 (No Action Alternative) concerning the proposal to store carbon dioxide underground on public land in Carter County (Snowy River CO2 Sequestration Project) and deny Denbury a right-of-way permit. I am particularly concerned that Denbury's CO2 transport lines have a history of ruptures and that sequestration is too risky as there is no guarantee that CO2 will not leak (potentially in large amounts) from wherever it is sequestered.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. Denbury would prepare a T&M Plan and a Quality Assurance Plan for EPA review and approval during the UIC Class VI permitting process. The T&M Plan must include installation and use of continuous recording devices to monitor injection pressure, rate, and volume [40 CFR §146.90(b)]. The T&M Plan must be periodically reviewed at a frequency no less than once every 5 years to incorporate monitoring data that has been collected [40 CFR §146.90(j)]. Denbury must provide the EPA with semi-annual reports containing the monthly volume and/or mass of the carbon dioxide stream injected over the reporting period and the volume injected cumulatively over the life of the Project [40 CFR §146.91(a)(5)]. Additionally, Denbury must also report to EPA according to the Project's MRV Plan 40 CFR § 98.448), which requires monitoring, reporting and verification to quantify CO2 leakages and volume injected. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

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310	Vanderbilt, Amy	Leakage of carbon from reservoirs is also a concern.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. Denbury would prepare a T&M Plan and a Quality Assurance Plan for EPA review and approval during the UIC Class VI permitting process. The T&M Plan must include installation and use of continuous recording devices to monitor injection pressure, rate, and volume [40 CFR §146.90(b)]. The T&M Plan must be periodically reviewed at a frequency no less than once every 5 years to incorporate monitoring data that has been collected [40 CFR §146.90(j)]. Denbury must provide the EPA with semi-annual reports containing the monthly volume and/or mass of the carbon dioxide stream injected over the reporting period and the volume injected cumulatively over the life of the Project [40 CFR §146.91(a)(5)]. Additionally, Denbury must also report to EPA according to the Project's MRV Plan 40 CFR § 98.448), which requires monitoring, reporting and verification to quantify CO2 leakages and volume injected.
311	Caspbara, Bp	There are dangerous health and safety risks to locals, with credible reports of ruptures on existing Denbury-operated lines in Montana. In 2020, a Mississippi pipeline owned by Denbury ruptured - leading to over 40 hospitalizations and the evacuation of 300 residents. The company does not have a good history.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
312	Gaskins, Jamie	We need to do better for our children and our community. Instead of letting people like Exxon come in and destroy our land and water we all know nobody takes care of the pipelines and all they do is leak which we've had several weeks in our state remember and oh how about the train fell off the track and pollutants into a Yellowstone River stylus and prices	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
313	Hansen, Laulette	Please don't dump risky "carbon capture waste or locate pipelines on Montana public lands. We stand only to lose by this costly, risky sacrifice, which is being made for their corporate gain . Let EXCON put those pipelines in their own back yard 1st, to see how "safe"!they are. (The records show they are NOT SAFE.)	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
314	Aus, Kristin	Denbury-operated CO2 transmission lines have a history of rupturing - which spreads the pollution and causes injury to local people. Our small town EMS people are amazing, self-less and hard working as it is. They should not be faced with this potential disaster.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. EA Section 3.4.3 discloses impacts to public services. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
315	Iverson, Linda	Also, the possibility of pipeline rupture is eminent. CO2 is hard on pipelines and this company has had a serious rupture occur in the past.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*
316	Axelrod, Joshua; Natural Resources Defense Council	The Pipeline and Hazardous Materials Safety Administration (PHMSA) is the primary federal agency tasked with regulating the operation of pipelines carrying hazardous materials. Under PHMSA regulations, CO2 is classified as a hazardous material. However, PHMSA's CO2 pipeline regulations currently only apply to CO2 transported in its supercritical liquid phase. Because CO2 can and does change phase during pipeline transport, PHMSA is in the midst of a rulemaking process to remedy this gap in its regulations and ensure that CO2 pipelines are regulated regardless of the physical state of the CO2 they are carrying. A proposed rule is currently before the Office of Information and Regulatory Affairs (OIRA). While we strongly support PHMSA's efforts to close this regulatory gap, we raise it here to urge the BLM, regardless of its decision on further environmental impact assessment, to delay any decision on ROW permitting for CO2 pipeline infrastructure until after this rule has been finalized.	Development of policies and regulations is outside the scope of this EA. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities. If federal, state, and local governments implement new regulations that the Project would be subject to, Denbury would be responsible for compliance with all current regulatory requirements, including any new PHMSA rule(s), at that time.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
317	Neyrinck, Jean	I think about all the pipe line breaks and leaks and spills in the news over my life	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
318	Lohrer, Roger	While carbon sequestration sounds good on paper, this incredibly expensive technology remains unproven, and has a track record of dangerous pipeline ruptures.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
319	Lohrer, Roger	Denbury-operated CO2 transport lines have a documented history of dangerous ruptures, including one in Powder River County, Montana.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
320	Emerson, Lauran	Denbury-operated CO2 transport lines have a documented history of dangerous ruptures, and the risks of a new pipeline rupturing are high.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2)*. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
321	Kuether, Charles	My understanding is that Denbury-operated CO2 transport lines have a documented history of dangerous ruptures, including one in Powder River County, MT, causing serious injury to workers and local residents. There is NO reason to subject the Community to this unnecessary risk.	As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. In accordance with 43 CFR 2807.17(a), BLM may suspend or terminate a grant if it is not in compliance with applicable laws and regulations or any terms, conditions, or stipulations of the grant.
322	Individual	Has there been any Plume modeling done on how far and in what concentrations CO2 could spread in the event of a CO2 pipeline leak or rupture? What impact could this project have on Carter County residents and their livelihoods if a leak or rupture were to happen? What if it resulted in death? What will happen if livestock are exposed? Will they miss-carry,abort or die? Who would compensate us? Generations have worked their whole lives to build these genetics and herds it would be absolutely devastating.	Denbury would prepare a T&M Plan and a Quality Assurance Plan for EPA review and approval during the UIC Class VI permitting process. The T&M Plan must include installation and use of continuous recording devices to monitor injection pressure, rate, and volume [40 CFR §146.90(b)]. The T&M Plan must be periodically reviewed at a frequency no less than once every 5 years to incorporate monitoring data that has been collected [40 CFR §146.90(j)]. Denbury must provide the EPA with semi-annual reports containing the monthly volume and/or mass of the carbon dioxide stream injected over the reporting period and the volume injected cumulatively over the life of the Project [40 CFR §146.91(a)(5)]. Additionally, Denbury must also report to EPA according to the Project's MRV Plan 40 CFR § 98.448), which requires monitoring, reporting and verification to quantify CO2 leakages and volume injected. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)].
Invasive, Non-Native Species			

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
323	Mccutchan Royer, Shantel	I'm not satisfied with the noxious weed solution. A lady at Ekalakas meeting said that "they spread like wildfire." I've seen how pipelines deal with weeds, and it's not well. And in my experience complaining about the job they are doing, spraying doesn't get you anywhere. So the spraying has become my problem if I don't want it to turn into a larger problem.	As noted in Section 1.7.4 of the EA, Denbury has prepared a comprehensive Noxious Weed Management Plan (POD Appendix J) that meets the 2015 MCFO RMP objectives to prevent the expansion or eliminate the occurrence of invasive, non-native, or noxious weed species within the proposed ROWs. Section 5.10 and Ventenata Survey Report Appendix U in POD discusses the noxious weed inventory, mapping, and control efforts conducted by Denbury. EA Section 3.5.1 was revised to clarify that approximately 120 acres of noxious weeds were mapped within the proposed ROWs, as presented in the Attachment A of the Noxious Weed Management Plan in POD Appendix J. In addition to the 120 acres mapped, the BLM identified several areas of previously-recorded ventenata infestations outside of the proposed disturbance footprint but inside the Project area. Denbury treated approximately 800 acres, 1,200 acres, and 1,145 acres of ventenata, in 2022, 2023, and 2024, respectively, which included acres within the proposed disturbance footprint and within the overall Project area. Denbury would continue to coordinate with the BLM to map and treat all noxious and invasive weeds annually in compliance with the BLM-approved Pesticide Use Permit.
324	Carroll, Llane; Harmon Creek Cattle LLC	The EA presentation presumes that the implementation of alternative two will result in control of the noxious weed ventenata. The EA asserts that if alternative one was selected there would be an indirect reduction of sage grouse habitat because ventenata would not be controlled. If ventenata is present, failure to control it would be a violation of BLM policy as their website indicates that control of noxious weeds is paramount in their policies. It is not clear why alternative one could not be modified to include weed control.	As noted in Section 1.7.4 of the EA, Denbury has prepared a comprehensive Noxious Weed Management Plan (POD Appendix J) that meets the 2015 MCFO RMP objectives to prevent the expansion or eliminate the occurrence of invasive, non-native, or noxious weed species within the proposed ROWs. Section 5.10 and Ventenata Survey Report Appendix U in POD discusses the noxious weed inventory, mapping, and control efforts conducted by Denbury. EA Section 3.5.1 was revised to clarify that approximately 120 acres of noxious weeds were mapped within the proposed ROWs, as presented in the Attachment A of the Noxious Weed Management Plan in POD Appendix J. In addition to the 120 acres mapped, the BLM identified several areas of previously-recorded ventenata infestations outside of the proposed disturbance footprint but inside the Project area. Denbury treated approximately 800 acres, 1,200 acres, and 1,145 acres of ventenata, in 2022, 2023, and 2024, respectively, which included acres within the proposed disturbance footprint and within the overall Project area. Denbury would continue to coordinate with the BLM to map and treat all noxious and invasive weeds annually in compliance with the BLM-approved Pesticide Use Permit. EA Section 3.5.2 states that Denbury would cease treatments of noxious/invasive weeds. It was updated to clarify that noxious weeds could be treated through federal, state, or county efforts; however, treatment of the invasive ventenata and other invasive species that degrade sage-grouse habitat may not occur or would occur on a much smaller scale.
325	Brad Schmitz; Montana Fish, Wildlife & Parks Region 7	While we again appreciate the numerous beneficial mitigation measures that are being instituted, FWP respectfully disagrees with the assessment that Alternative 2 (proceed with proposed action) would be a "net conservation gain of sage-grouse habitat" resulting from the conservation easements and weed treatments (page 68 of the EA), and that it is preferable over Alternative 1 (No Action). According to surveys completed to date, less than 125 acres of noxious weeds have been identified (Attachment A in Appendix J), consisting of primarily Ventenata and Canada Thistle. While this is likely an underestimate of the total infestation acreage, it is minor in relation to the size of the overall project area (0.11%). Additionally, even if Denbury was not responsible for weed management (e.g., No Action Alternative) BLM could contract with weed specialists (e.g., Carter County Weed Department) and/or apply for a Wildlife Habitat Improvement Program grant from FWP to manage noxious weeds in this area.	EA Section 3.5.2 has been updated to clarify that noxious and invasive weeds could be treated through federal, state, or county efforts; however, treatment of the invasive ventenata and other invasive species that degrade sage-grouse habitat may not occur or would occur on a much smaller scale. EA Section 3.5.1 was revised to clarify that approximately 120 acres of noxious weeds were mapped within the proposed ROWs, as presented in the Attachment A of the Noxious Weed Management Plan in POD Appendix J. In addition to the 120 acres mapped, the BLM identified several areas of previously-recorded ventenata infestations outside of the proposed disturbance footprint but inside the Project area. Denbury treated approximately 800 acres, 1,200 acres, and 1,145 acres of ventenata, in 2022, 2023, and 2024, respectively, which included acres within the proposed disturbance footprint and within the overall Project area. Denbury would continue to coordinate with the BLM to map and treat all noxious and invasive weeds annually in compliance with the BLM-approved Pesticide Use Permit.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
326	Catherin-Sauer, Augusta; Northern Plains Resource Council	BLM must also analyze the impacts to GRSG and its habitat from invasive plants. Denbury identified a risk that the project will further the spread of invasive grass species in the area. The proposed project area has four already located infestations of Ventana grasses and "[t]hree small populations of Canada thistle." Management of the invasive Ventana grasses is a priority for BLM. As ranchers, we are particularly concerned about the projects' capacity to spread noxious weeds, presumably in light of the effect such a spread would have on agriculture and grazing in the area. This has the potential to seriously impact the future of our family ranches.	As noted in Section 1.7.4 of the EA, Denbury has prepared a comprehensive Noxious Weed Management Plan (POD Appendix J) that meets the 2015 MCFO RMP objectives to prevent the expansion or eliminate the occurrence of invasive, non-native, or noxious weed species within the proposed ROWs. Section 5.10 and Ventenata Survey Report Appendix U in POD discusses the noxious weed inventory, mapping, and control efforts conducted by Denbury. EA Section 3.5 includes the current condition of noxious and invasive weeds (including Ventenata) in the Project area and the potential to lead to poor habitat quality. In addition, EA Section 3.5.1 was revised to clarify that approximately 120 acres of noxious weeds were mapped within the proposed ROWs, as presented in the Attachment A of the Noxious Weed Management Plan in POD Appendix J. In addition to the 120 acres mapped, the BLM identified several areas of previously-recorded ventenata infestations outside of the proposed disturbance footprint but inside the Project area. Denbury treated approximately 800 acres, 1,200 acres, and 1,145 acres of ventenata, in 2022, 2023, and 2024, respectively, which included acres within the proposed disturbance footprint and within the overall Project area. Denbury would continue to coordinate with the BLM to map and treat all noxious and invasive weeds annually in compliance with the BLM-approved Pesticide Use Permit. EA Section 3.5.2. states that Denbury would cease treatments of noxious/invasive weeds. It was updated to clarify that noxious weeds could be treated through federal, state, or county efforts; however, treatment of the invasive ventenata and other invasive species that degrade sage-grouse habitat may not occur or would occur on a much smaller scale.
Lands and Realty			
327	Millbrooke, Anne	Use of public lands constitutes a subsidy for private industry, and history has shown that the public ends up liable for any mishaps or cleanup. The proposed 30-year lease doesn't cover the life of perpetual storage of the CO2, and in fact 30 years suggests that again public lands stewards will probably stuck with the clean-up once the lease and any extensions expire. Is 30-year lease simply an expediency to get around not having the legal authority to grant a permit for perpetual storage of CO2? Thirty years seems arbitrary, more like the too common life cycle of development, a single cycle of built-it, suck out profits, defer maintenance, and abandon it. Reclamation plans rarely describe subsequent "reclamation" as the construction of homes and businesses directly on the gravel bottoms of former gravel pits as is the on-going reality in the Belgrade and Four Corners areas of Gallatin County. Moreover, storing carbon for only 30 years only postpones release, while encouraging dirty energy and private profiteering now.	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, including the no action alternative (Alternative 1), under which the BLM would not issue ROW grants and the Project would not be constructed. The environmental effects of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded. Denbury would be required to secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. As stated in EA Section 2.1.1, at the time of abandonment of BLM ROWs, Denbury would obtain any required authorization from the BLM, State, and EPA for the respective authorities. All infrastructure and facilities would be removed and disposed of or recycled in approved locations. Re-grading and revegetation of BLM disturbed areas would be completed in accordance to BLM requirements and procedures described in the POD and Appendix G.
328	Millbrooke, Anne	Will there be adequate oversight of the entire scope of infrastructure? (BLM is a land steward, not a construction management agency) Are there technically appropriate qualifications and adequate funding for BLM personnel to monitor and supervise the construction, operation, maintenance of this proposed project on public lands and to enforce environmental laws and regulations?	ROWs are monitored by the BLM resource specialists for compliance with the POD as well as state and federal laws through periodic site inspections. Inspections would be conducted during construction, reclamation, and operation activities to ensure POD compliance and reclamation meets BLM standards. For this project, in addition to BLM staff inspections, Denbury committed to hiring a third-party inspector to assist the BLM with POD compliance with the ROW stipulations, permit conditions, and procedures and commitments outlined in the POD and associated appendices during construction and reclamation activities. Moreover, a paleontologist would monitor during construction activities in accordance with the Paleontological Unanticipated Discovery Plan. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded. Denbury would be required to secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)].

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
329	Mitchell, Larry	If this is such a "good deal", why does Exxon want to use public BLM land for it? Why not inject CO2 on private land? There is no shortage of it. Are the American taxpayers such suckers? Is the BLM an inept paper tiger incapable of careful environmental analysis or necessary future enforcement? Are the taxpayers' pockets deep enough to pay for the inevitable mistakes from this project once the responsible parties "bankrupt" themselves? I say take your waste elsewhere for disposal and leave public lands out of it. No deal!!	As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded. Denbury would be required to secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of this analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. Project expenses for construction and operation are the responsibility of Denbury and not the BLM. The ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants.
330	Individual	I oppose actions that would give over control of public land to private entities, which this project would.	The BLM is processing the ROW application under FLPMA Title V. BLM ROW grants contains terms, conditions, and stipulations that the holder must adhere to. Under Section 506 of the FLPMA (43 U.S.C. 1766) and 43 CFR 2807.17, non-compliance with any FLPMA provision, conditions of the ROW grant, or applicable rules or regulations could be grounds for suspension or termination of the ROW. FLPMA Section 701 (43 U.S.C. 1701) states, "nothing in this Act shall be construed as limiting or restricting the power and authority of the United States" As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, including the no action alternative (Alternative 1), under which the BLM would not issue ROW grants and the Project would not be constructed. The environmental effects of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
331	O'Grady, Morgan; Western Environmental Law Center et al.	The Draft EA appears to discuss both surface and pore space easements, but does not clearly distinguish between the two or specify the duration of the pore space easement. BLM consistently describes the ROW as having a "30-year term," covering the construction and operation of infrastructure used for the transportation and injection of CO2. The use of federal pore space for geologic carbon storage, however, would be perpetual.	ROW grants can be renewed through an application process as long as the holder is in compliance with the terms and conditions of the grant (43 CFR 2807.22). The BLM would review a ROW renewal using current data and land use plan decisions at that time. Therefore, a ROW holder may request renew the ROW grants prior to their expiration. EA Section 2.1 has been updated to clarify Denbury's application requested 30-year renewable ROW grants.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
332	Montana Wildlife Federation	MWF recognizes the large block of BLM land south of Ekalaka as one of the larger consolidated pieces of public land in eastern MT, and many of our members frequent the area to hunt for public land. Thus, this project uses a new authority, BLM IM 2022-041, to process C02 sequestration projects on BLM lands as ROWS, which is of deep concern to us. To our knowledge, this guidance was put in place without any opportunity for public review or input. It was announced as "guidance" using a basis from authorities currently allowing for the temporary storage of CO2 associated with oil extraction. However, with this new policy, BLM has authorized permanent storage of CO2, particularly, if not exclusively, for excess CO2 related to oil field development (past and future). By allowing review through ROWs, BLM has provided a minimum pathway for review of the many component features, actions, and decisions necessary to approve a proposal. This ROW review eliminates the many reasonably foreseeable, connected, and cumulative actions of an operational CO2 sequestration project.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The EA analyzes the proposed BLM ROWs, pursuant to 43 CFR 2800 and Title V of the FLPMA, as amended, for use of public lands for a UIC Class VI operation in Carter County, Montana. As stated in BLM IM 2022-041, Title V of FLPMA and its implementing regulations, 43 CFR 2800, authorize the BLM to issue ROWs to geologically sequester CO2 in federal pore space, including necessary physical infrastructure and for the use and occupancy of the federal pore space itself. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana.
333	Dinstel, Dan	Delay the permit until the FLPMA ruling concerning public land use has been litigated and finalized.	The EA analyzes the proposed BLM ROWs, pursuant to 43 CFR 2800 and Title V of the FLPMA, as amended, for use of public lands for a UIC Class VI operation in Carter County, Montana. As stated in BLM IM 2022-041, Title V of FLPMA and its implementing regulations, 43 CFR 2800, authorize the BLM to issue ROWs to geologically sequester CO2 in federal pore space, including necessary physical infrastructure and for the use and occupancy of the federal pore space itself. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana.
334	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Finally, BLM must ensure compliance with the Miles City resource management plan (RMP). We doubt the Project could be compliant, and at the very least, BLM should wait on moving forward until revisions to the RMP are complete.	EA Section 1.4 addresses compliance with the 2015 MCFO RMP of the proposed action located within greater sage-grouse PHMA. In the 2015 MCFO RMP, PHMAs are listed as avoidance areas for major and minor ROWs (Management Decision 3 on pages 2-9 and 2-10). Chapter 6 of the 2015 MCFO RMP defines avoidance areas as "Areas with sensitive resource values in which ROWs and surface disturbing and disruptive activities would be strongly discouraged. ROW avoidance areas are to be avoided but may be available for location of ROWs with special stipulations / mitigation." EA Section 1.4 was revised to provide additional clarification regarding the BLM's formal adoption of the State's approach to analyzing disturbance to sage-grouse habitat in a maintenance action of the land use plan on July 30, 2018. Although the proposed action would be in a PHMA, the Project is in compliance with BLM sage-grouse goals, objectives, and management decisions based on Denbury's implementation of avoidance measures, adherence to stipulations and mitigation requirements, and compliance with the EO 12-2015 surface disturbance 5% limit deviation through compensatory mitigation that does not contribute to declines in sage-grouse populations.
335	Olson, Vicki	We are trying to take care of this land and leave it better than we found it. This project had the power to destroy a very large piece of land. This is not acceptable. Please stop thus right now. The risk is to great.	The EA analyzes the proposed BLM ROWs, pursuant to 43 CFR 2800 and Title V of the FLPMA, as amended, for use of public lands for a UIC Class VI operation in Carter County, Montana. As stated in BLM IM 2022-041, Title V of FLPMA and its implementing regulations, 43 CFR 2800, authorize the BLM to issue ROWs to geologically sequester CO2 in federal pore space, including necessary physical infrastructure and for the use and occupancy of the federal pore space itself. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
336	Aus, Kristin	Our public lands should never be used for storing pollution on behalf of a fossil fuel company - and especially not using taxpayer dollars. Those lands are for our public to hunt, fish, and enjoy the outdoors. That is so vital to American life it cannot be put at risk.	Denbury submitted an SF-299 application proposing ROWs (surface and pore space) in Carter County, Montana on BLM lands to sequester CO2 through an EPA UIC Class VI permit. Therefore, the BLM initiated NEPA with the purpose and need for the action to respond to the pending application requesting ROWs in Carter County, Montana for sequestering CO2 through an EPA UIC Class VI permit in accordance with the 2015 MCFO RMP, FLPMA ROW policies and regulations. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of this analysis. Because this Project does not meet Section 45Q requirements (i.e., it is not a carbon capture project), Denbury would not receive tax credits for the Project. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. Project expenses for construction and operation are the responsibility of Denbury and not the BLM. The ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants.
337	Chiesa, Dee Dee	I have relatives who farm and ranch in both Carter and Powder River County and fear this project will have negative consequences for their land which many have stewarded for over 100 years. Being primarily dry land farmers, protecting the ground water and the integrity of the land is of utmost importance to them. Voting for No Action Alternative will protect that area in perpetuity!!	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. See POD Appendix A for details on EPA UIC Class VI permit requirements. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details.
338	Johnston, Mae	I grew up in Eastern Montana - Please don't destroy this land for profit.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
Livestock and Grazing Management			

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
339	Individual	Construction and injection wells will also disrupt local ranching operations.	EA Section 1.7.1 discusses the minimal disruption the Project would have to livestock grazing/ranching operations. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs or seasons of use) in order to meet land health standards or other resource objectives. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details.
340	McCutchan Royer, Shantel	As a Carter County rancher I implore you to help us protect Carter County. We have a duty to preserve this pristine land and should not allow Exxon/Denbury to line their pockets while disrupting our livelihoods, causing irreparable damage to both the surface and subsurface environment by turning our county into a co2 dumping ground via the Snowy River Sequestration Project.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. EA Section 1.7.1 has been updated to further discloses VRM Classes in the Project area and that the proposed action would not result in substantial visual changes to the landscape. The POD includes a Reclamation, Mitigation, and Monitoring Plan that meets or exceeds VRM requirements to meet the guidelines for VRM Class III and VRM Class IV outlined in the 2015 MCFO RMP. Denbury would select paint and material colors that blend in with the surrounding landscape. Moreover, infrastructure placement along existing disturbances and well placement further facilitates meeting VRM Class III and VRM Class IV requirements. EA Section 1.7.1 also discusses the minimal disruption the Project would have to livestock grazing/ranching operations. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Based on the applicant committed measures and Project design features (e.g. no changes to existing ambient sound levels at closest residences, no changes to BLM grazing permits, no changes in use of publicly accessible lands, temporary removal of grazing infrastructure, Reclamation Plan with site-specific BLM-approved seed mixes, timing restrictions, weed treatments, erosion control measures, trenchless construction for wetlands and waterbodies, and Emergency Response Plan), the BLM determined that these resources (except sage-grouse) and resource uses, would not be affected to a degree that detailed analysis was required.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
341	Robinson, Maralee & Holly	We are concerned cattle ranchers in Montana. The cattle ranchers of Montana have a long standing commitment to resource management that keep lands and water healthy. MT alone has a network of state grazing districts (MASGD). The districts allow for the greatest use of range forage while conserving limited natural resources. We voice serious concerns regarding the proposed carbon sequestration project. We believe hundreds of grazing acres will be lost to buildings, gravel, roads and wells. Proposed deep well injection sites may contaminate underground water. Livestock and wildlife habitat water relies heavily on ground water, contamination is a serious concern. Livestock and wildlife have a mutually beneficial relationship when managed well. The work producers have done to maintain grazing land will be destroyed. The negative effects to the future of the local communities, the economy and the livestock industry are far reaching. With this in mind we strongly encourage BLM to no longer consider the implementation of this carbon storage project. We thank you for the opportunity to provide comments.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. EA Section 1.7.1 discusses the minimal disruption the Project would have to livestock grazing/ranching operations. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details. The EPA requires "baseline geochemical data on subsurface formations, including all USDWs in the area of review" for Class VI UIC wells [40 CFR §146.82(a)(6)]. As described in POD Section 5.5, Denbury conducted sampling and analysis of groundwater and surface water samples in 2022 and 2023 as part of its baseline characterization program. Potential fluid leakage (e.g., CO2 or formation fluid) to USDWs would be routinely monitored during the life of the Project in accordance with an EPA-approved T&M Plan and MRV Plan as discussed in POD Appendix A. Routine monitoring would include evaluation of elevated concentrations of indicator parameters in surface water, soil, gas, and ambient air samples. An Emergency and Remedial Response Plan, as required under 40 CFR §146.94(a) and approved by the EPA as part of the UIC permitting process, would be implemented to protect USDWs in the event that movement of the injection or formation fluid may endanger a USDW during construction, operation, and post-injection site care periods.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
342	Individual	The primary concern always being how grazing lands and permits will be altered by proposed actions. As such, we voice serious concerns regarding the proposed carbon sequestration project. The potential impacts of the various injection sites, pipelines, roadways, wells, and offices will disrupt the grazing and agricultural use in the areas proposed. The BLM anticipates only the loss of a couple AUM's per allotment due to this project, we disagree with this calculation. With a project of this scale, over the course of a half a century, it is irrational to believe that there will be minimal impact to grazing. Hundreds of grazing acres will be lost to buildings, gravel, roads, and the wells themselves. On top of the physical forage loss, the increased human use of the area will undoubtedly affect livestock productivity and wildlife habitat. With roads cutting across rangeland, an exponential increase in people and activity on the landscape, the noise and activity alone will result in a change in how and where animals will graze, both livestock and wildlife. Further, the loss of land is not limited to the exact acreage which will be graveled, built upon, or driven on- the lands closest to those developments will not be utilized by livestock and wildlife when humans are there. Animals will not graze right up to the edge of the gravel next to the office building, it goes against their instincts and behavior patterns. Purely on that premise, the calculated loss of acres and therefore loss of AUM's is inherently flawed. We want to emphasize the idea that even losses that appear insignificant add up. Producers across Montana are consistently having to make small changes due to regulations across all agencies, both state and federal, and various economic drivers. In many cases, the impact is expected to be "minimal" but over time, a compilation of minimal impacts creates a large impact. These changes not only alter producers operations and profitability, but wildlife habitat, the communities health and development, as well as local and state economies. Our organizations request explicit assurances written into the plan that identify the exact AUM loss. We request that producers do not face a decreased change in allowable AUM's on their allotment. The entirety of the C & B Grazing District lies within the boundaries of the project area. However small the BLM believes the impacts are to grazing, it is clear that a significant percentage of public lands grazers in the Carter County area will be affected by the loss of AUM's from this project.	EA Section 1.7.1 discusses the minimal disruption the Project would have to livestock grazing/ranching operations. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover.
343	Dinstel, Dan	The Snowy River project will be detrimental to "food and fiber production" because grazing areas for cattle and sheep will be impacted.	EA Section 1.7.1 discusses the minimal disruption the Project would have to livestock grazing/ranching operations. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
344	Not Provided	I would much rather see the blm work with ranchers to improve grazing management. More water projects and increases in rotational grazing will improve grass and store more carbon naturally how mother nature has done it for ever. Seems like a much more common sense approach to me. Benefits to the environment, ranchers, and local economies. Grazers all over the world are doing a much better job of grazing then the old 2 or 3 pasture rotation.	EA Section 1.7.1 discusses the minimal disruption the Project would have to livestock grazing/ranching operations. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Table 10-1 of the BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends (2023) lists the average carbon sequestration capacity on a per acre basis that occurs on Federal lands for each state. These data are derived from the USGS's *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14* (2018) report on federal emissions and sinks. The average acre of federal land in Montana sequesters -0.69602 metric tons of carbon per year. For the 46 acres of federal land that would be converted to gravel cover and new two-tracks during Project operation, the Project would result in a loss of capacity to naturally sequester approximately 32 metric tons of carbon per year. Over a 20-year injection period, this equates to 640 metric tons of carbon sequestration, which is significantly less than the 150 million metric tons of CO2 that the Project may sequester. At the end of the project's life, these 46 acres would be reclaimed and the lands' capacity to act as a natural carbon sink would be restored.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
345	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Project proposes to construct 15 injection wells across 100,000 acres of federal lands. The Project therefore will highly impact vast amounts of land containing unique characteristics, vegetation, and soils. Further, the surrounding lands include farms and ranches. As one rancher whose property borders the Project wrote in an op-ed about the Project, "Construction disruption, aquifer contamination from pipeline leaks, and potential underground hydrological disturbances could be economically devastating to this community and the grasslands we depend on."	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. EA Section 1.7.1 discusses the minimal disruption the Project would have to livestock grazing/ranching operations. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.734 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
346	Lohrer, Laurie	The project will disrupt landowners & agricultural operations in the area.	EA Section 1.7.1 discusses the minimal disruption the Project would have to livestock grazing/ranching operations. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
347	Kennedy, Kylee; C&B Grazing District	I would also like to state that I worry about the threat that the CO2 sequestration project may have on not only my life but also my livestock's. The CO2 gas mixture has been known to erode pipelines and leak into groundwater, making water more acidic and causing other long-term effects. I am a part of the C&B Grazing District, and we already have water problems especially in drought years. I worry that the addition of the Snowy River CO2 Sequestration Project would only make this issue worse for me and my fellow livestock owners. I believe that more testing should be done before beginning this project. I am sure that I can speak for my fellow Carter County residents when I say that I don't appreciate being used as a test subject when there are so many risks involved.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. As described in POD Sections 4.2, 4.8, and 7, pipelines would be constructed, operated, and maintained in accordance with USDOT regulatory requirements outlined in 49 CFR Part 195, including the minimum requirements for operating and maintaining pipeline systems contained in 49 CFR Part 195 Subpart F. Denbury would operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402. This plan would include details for conducting and documenting operations and maintenance activities for the flowlines and bulklines. The plan would include procedures for handling start-up, shut-down, repair, and abnormal operations. ROWs would be patrolled, and leakage surveys would be conducted at the minimum frequencies defined in 49 CFR §§195.414 and 416. Provisions would be included in the plan to ensure required reporting is accomplished accurately and on time, to document the completion of the above-listed activities, and to ensure appropriate review and updates occur on an annual basis. The plan would be available to applicable operations personnel, and Denbury would provide training to personnel on the plan's contents and requirements. In addition to periodic ROW patrols, Denbury would equip the flowlines and bulklines with a Supervisory Control and Data Acquisition system that would allow remote monitoring of the pipelines and transmittal of the data to its pipeline control center. The control center would have the ability to open and close valves remotely when a pressure anomaly or flow rate change is observed. EA Section 1.7.1 has been revised to include regulatory requirements related to safely constructing, operating, maintaining, and monitoring pipelines and injection wells. Analysis with regards to public health associated with water quality has been added to EA Section 3.6.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
348	Kennedy, William; C&B Grazing District	I am strongly opposed to this project. The BLM where the C&B grazing district is located has had a lot of projects or experiments done on it over the years other than pipelines. Most of these projects- water development, contour furrowing, rotational grazing and seeding grass and alfalfa- have been beneficial to grazing, wildlife and everyone involved. The only thing I see as far as the Snowy River Co2 sequestration project is a never-ending nightmare. PLEASE DO NOT APPROVE THE SNOWY RIVER SEQUESTRATION PROJECT!	EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
349	Loehding, Travis; C&B Grazing District	I am writing to you on the behalf of the C&B Grazing District and how we strongly urge that the BLM choose Alternative 1 - No Action Alternative. This grazing district has a MOU with the BLM and was not notified prior to the general public about the Snowy River CO2 Sequestration Project. The C&B Grazing District was established 90 years ago and has seen multiple experiments done over the years. Most of which have been to benefit the grass, water and wildlife, including contour furrowing, water development and rotational grazing. The producers of the C&B Grazing District rely on the grass and water within these BLM allotments. There is concern that the Snowy River CO2 Sequestration Project would disrupt the use of pasture land, with the building of roads and the well sights taking up space that was once grassland. Along with the possible threat, both short-term and long-term, to the water supply that the producers rely on is a major concern, especially during a drought period. Producers have found it nearly impossible to do simple improvements such as running a pipeline for water without having years of dealing with red tape and getting permission from multiple agencies. The Snowy River CO2 Sequestration Project will pose a threat to producers safety and livelihood. We respectfully urge you to deny Denbury's application for a right-of-way (ROW) permit and to choose Alternative 1 - No Action Alternative.	Coordination in accordance with the MOU was not triggered as the environmental review for this project is an EA and not an EIS, and the BLM determined the surface disturbing activities along with committed measures and design features would not result in changes to grazing permits or improvements. EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details.

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350	Fuglevand, Lester	The project will not cause disruption to landowners and agricultural operations in the area.	EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process.
351	Nordahl, Amber	We ranchers are stewards of the land. Letting a corporation with no real interest in Montana, its people, or agriculture is not good for our state. Land and rain are all we have to work with, that we owe our existence to. Please guard that for us all.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
352	Aus, Kristin	Eastern Montana might seem like a great place to store pollution but it isn't. Yes, population is sparse here but we raise the country's food here so our working land must stay clean. Additionally, our land and water is the property of our farming and ranching families. Even if the number of people are small, they do not deserve to lose their family net worth and livelihood so that Exxon can pretend to be doing something for the environment.	EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
353	Lohrer, Roger	The project will cause disruption to landowners and AG operations in the area. and rangeland degradation.	EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
354	Newton, Seth	The project will cause disruption to landowners and agricultural operations in the area with its construction while leaving a permanent mark on pristine rangeland. This project poses threats to local groundwater and rangeland degradation.	EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction.

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355	Emerson, Lauran	It would disrupt agricultural operations in the area with its construction and potential threats to local groundwater and rangeland degradation.	EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
356	Kuether, Charles	I appears to me that the project will cause disruption to agricultural operations in the area with its construction and WORSE offers potential threats to local groundwater.	EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
357	Missouri River Basin Cooperative State Grazing District Chair Lane Pilster Vice Chair Tom Courtney Myron Johnston Jeffery Tauck Richard Morgan	For your reference I will be attaching our current MOU that we have with the BLM office. My board is very concerned as to why we were not contacted about the Snowy River project since it directly impacts one of our permittee's. I am also attaching our opposition to this project. The Missouri River Basin Cooperative State Grazing District stands opposed to the Snowy River CO2 Sequestration Project. Due to the numerous unknown effects to the land and the water the MRBCSGD does not condone any aspect of the Snow River project. Our opposition to this project stems from lack of communication from multiple agencies.	EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. Temporary removal of grazing infrastructure (such as fences, gates, cattleguards, and water pipelines) during construction activities would be addressed with the permittee via landowner agreements. Upon completion of construction, grazing infrastructure that meets BLM standards would be replaced, and areas of temporary disturbance would be reclaimed in accordance with the Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). Denbury would seed disturbed areas with a BLM-recommended seed mix and would treat and monitor invasive/noxious weeds. In addition, existing hard-surfaced roads used would be maintained in an operable condition to allow access for the public and/or landowners. Denbury would implement a traffic plan that addresses public safety, traffic control, and access to minimize traffic disruptions. See POD Section 4.1.3 for details. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction.
NEPA			

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358	Not Provided	The EPA recommended in the initial public comment period meaningfully engaging with rural communities and stakeholders to understand their experiences and address their concerns with respect to the potential environmental impacts of the proposed Project and alternatives. Public comment on this system is technically difficult to navigate and the hands raised in this meeting suggests that this is not the best format to engage with the public. Will there be additional public comment opportunities given that the panel was also dropped mid meeting?	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). For both scoping and public comment periods, there were opportunities to submit comments in writing (mailed or hand-delivered) to the MCFO or electronic via the BLM e-Planning project site. All materials for the Snowy River Project, including a detailed scoping report, are available on our e-Planning project site.
359	Not Provided	I am concerned that BLM's traditional management bias favoring extractive uses may improperly influence this NEPA analysis. Please see the attachment. It describes some BLM management problems, including those related to NEPA, and offers some solutions. Please consider supporting these solutions. Thank you. https://www.counterpunch.org/2021/08/20/the-blm-is-broken-heres-how-to-fix-it/	Analysis of federal policies and procedures is outside the scope of this analysis. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO_2 in Carter County, Montana.
360	Millbrooke, Anne	Is there any categorical exclusion? (I hope not!)	Categorical exclusions are categories of actions that Federal agencies have determined do not have significant effect on the quality of the human environment and for which, therefore, neither an EA or EIS is required. The BLM determined that a categorical exclusion does not apply to the proposed action and has prepared an EA to analyze environmental effects from the proposed action and each alternative.

361	Dinstel, Dan	I request that BLM not issue any permits for the Snowy River Carbon Sequestration Project until a full Environmental Impact Statement review is completed. A project of this size and magnitude deserves a more comprehensive review than an Environmental Assessment. An EIS will ensure the cumulative impacts of cultural resources, paleontological resources and greater sage grouse habitat, big game winter range and migration corridors, socioeconomic effects that will be adversely impacted will be fully evaluated. Carter County is a disadvantaged Justice 40 tract under climate change and energy criteria and a full EIS needs to be completed.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. An environmental justice analysis is not required for the Project due to recent changes in federal policy. Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and the accompanying Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), direct federal agencies to strictly follow the NEPA as written in statute. These directives also repeal previous Executive Orders 12898 and 14096, which had required consideration of environmental justice in federal decision-making. Because those prior Executive Orders have been repealed, the BLM is not obligated to conduct an environmental justice evaluation to make a reasoned decision under NEPA. The Justice40 Initiative, established under Executive Order 14008 in 2021, was part of a broader effort to address environmental justice and equity in federal policy and funding decisions. Executive Order 14008 was rescinded on Jan. 20, 2025. Further, the Project is not a federal investment project, nor is it federally funded; therefore, Justice 40 was not applicable when the initiative was in effect. The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA

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See Previous Page	*See Previous Page*	*See Previous Page*	Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.
362	Carroll, Sharon	Meaningful engagement with Carter County residents has not occurred with this project. The first community meeting took place on October 12, 2023, 15 days after the comment period had opened, leaving Carter County residents with a mere 15 days to engage their own neighbors in conversation and research about the project. At this meeting, "we" was frequently used by BLM in explaining the project plan, causing residents to be confused about to whom "we" referred-BLM or Denbury. We are still uncertain to whom to direct our requests for a seat at the table-whether that is in the form of a conversation about grazing permits or to request a fund to mitigate impacts. In fact, this project has continued to appear not as a permit process, but a cooperative agreement between Denbury and BLM. Landowners, many of them current permittees, have been excluded from this process from its outset- and the outset is so far prior to October 2023 that the residents, including BLM permit holders, are still not aware of when this process began. The EA states that Denbury met with the "Carter County officials" on April 19, 2022 and again on September 18, 2023 (p.72). According to the EA, Denbury met with the Carter County Commissioners on March 14, 2022 and with the Missouri River Basin Grazing Association on August 23, 2022(p.72). The Missouri River Basin Grazing District is NOT the C&B Grazing District whose BLM permittees comprise the area of the POD. The 2nd public meeting with BLM on March 5, 2024 was not an effective venue to "share information" from BLM or EPA officials. Rather, the meeting was a confusing array of officials placed throughout the event center at tables spaced around the area. This Open House concept of sharing information does not provide equal opportunity to ask and receive answers. County Commissioners, Landowners, and Permit Holders had to compete for the opportunity to ask questions of the BLM and EPA officials attending the meeting. If the POD changed as a result of substantive comments, details regarding the specific changes were not noted. Again, in keeping with a lack of attention to meaningful engagement with a rural community, the comment period was a brief 30 days- 13 days after the public meeting (referred to as an opportunity to "share information" in a press release by the BLM)- and was only extended after a petition requested such an extension.	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). There are regulatory requirements for specific BLM permitting/leasing actions to hold public hearings as part of their public engagement and permitting process. Public hearings are not a regulatory requirement for processing BLM ROWs. These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document. For both scoping and public comment periods, there were opportunities to submit comments in writing (mailed or hand-delivered) to the MCFO or electronic via the BLM e-Planning project site. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site.

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363	Montana Wildlife Federation	We express our unequivocal opposition to the proposed Snowy River CO2 Sequestration Project DOI-BLM-MT-C020-2023-0070. Given the permanence and significance of the proposal, we request an analysis through an Environmental Impact Statement (EIS).	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.

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364	Montana Wildlife Federation	In reviewing this proposal, BLM has failed to provide any NEPA analysis for its subsurface permanence or sufficient analysis of its significant scope, including safety concerns and the effects of surface facilities on wildlife, cultural, and paleontological resources. BLM's obligations to address reasonable foreseeable, direct, indirect, and cumulative impacts with the permitting of up to 15 T UIC Class VI wells by the EPA, which could have been readily accommodated by a cooperating agency agreement (such as advised by jurisdiction, by law, authorizations or expertise, (CEQ regulation 40 CFR1508.5) as well as the inclusion of State permitting requirements for private land and other aspects of this proposal where the state authorities. This approach would provide the complete picture of the proposal and address the requisite cumulative, connected, and reasonably foreseeable actions, particularly with an untested technology. Therefore, we object and note BLM's failure to comply with the National Environmental Policy Act's "hard look" requirements. The National Environmental Policy Act (NEPA) is our nation's bedrock environmental statute. NEPA is said to have "twin aims." First, the law commands agencies to consider the environmental impacts of proposed actions. Second, NEPA ensures that "the relevant information will be made available to the larger audience that may also play a role in both the decision-making process and the implementation of that decision." The analysis used in the Snowy River Project circumvents both "aims" and the NEPA review framework. We object to the Project's insufficient environmental assessment due to the lack of site-specific information. NEPA requires the agency to look "at environmental consequences." The BLM's obligation to do so is not lessened at the landscape or project level. NEPA's review obligations are more stringent and detailed at the project level, or "implementation stage," given the nature of "individual site-specific projects." General statements about possible effects and some risks do not constitute a hard look without justification for why more definitive information could not be provided. NEPA requires the agency to give the public "'the underlying environmental data' from which the BLM develops [ed] its opinions and arrives [d] at its decisions. The agency must explain its conclusions from its chosen methodology and why it considers the underlying evidence reliable. In the end, "vague and conclusory statements, without any supporting data, or mitigations based on the proponent "would do" do not constitute a 'hard look' at the environmental consequences of the action as required by NEPA. The analysis does not consider or include important project details – construction and implementation at various phases of the project means BLM has not taken the required "hard look" at all of the project's direct, indirect, and cumulative effects… because these effects supposedly will be presented in other documents by other agencies. This vague NEPA analysis used in the project's EA is permissible neither by law nor policy. Site-specific NEPA analysis is critical to ensuring informed public participation, formulating and evaluating alternatives, understanding project benefits, and avoiding or mitigating adverse project impacts. The analysis lacks site-specific details regarding project-implementation activities. At this stage, BLM is seeking approval for a minimum 30-year project with barely a mention of the other permitting needs from EPA, the State of Montana, and additional analysis for new electric lines. The BLM asserts that all effects from surface construction and other action associated will be designed to standards appropriate for their intended uses by the proponent. However complying 4 with these standards does not replace nor circumvent BLM's foundational NEPA obligations. For example, throughout the EA, construction practices, particularly for sage-grouse, cultural, and paleo resources, are briefly discussed with vague conclusions that 'mitigation practices" would result in "minor, short-term, and localized effects." Without disclosing site-specific locations for these activities, the NEPA's requirement to provide a site-specific analysis is unmet. The project is difficult to understand, and the latitude of activities is complex, making comments difficult. The lack of site specificity, implementation areas, timing, duration, coincident, connected, or cumulative actions, and consequences are not disclosed to the public. Like the public, the decision maker must be more informed and have sufficient information to sign a FONSI.	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Figure 3 in EA Appendix D shows the project sequence associated with BLM, EPA, and State of Montana. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project. As noted in EA Section 4.2, the BLM has been in close coordination with State of Montana and EPA Region 8 staff regarding the BLM NEPA review process to ensure consideration of the State permitting and EPA UIC permit requirements and permit review process. In particular, EPA UIC Class VI permit reviews are site specific well reviews determined to be functionally equivalent to NEPA reviews and are thus exempt from NEPA review requirements, unless triggered by another statutory requirement (e.g., NHPA). Analysis of another agency's permitting action that has not been proposed/applied for yet (i.e., EPA UIC Class VI permit), and will be analyzed in detail by the permitting agency using current data, would be outside of BLM's jurisdiction. The BLM did, however, analyze the connected action of surface disturbance on State and private lands and associated emissions from drilling and operation of EPA UIC Class wells from issuing a BLM ROW. See EA Section 2.1 where tables include surface acres on State and private lands and Section 3.2.3 for air resources analysis. Denbury's proposal includes all spatial and temporal components which allows for a comprehensive environmental analysis of connected actions associated with issuance of the BLM ROWs, and avoids NEPA piecemealing analysis. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As stated above, EPA would conduct site-specific reviews per well which would be equivalent to NEPA reviews.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
365	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM's processes and the Draft EA fall short on several grounds. With regards to public process, BLM's inadequate notices to the public, ill-timed hearings, and overall lack of responsiveness left locals feeling as if the Project is being rushed and that local concerns are not being considered, particularly because the Project will impact over 100,000 acres, last over 20 years, and introduces a type of industrial activity that is new to the area.	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). There are regulatory requirements for specific BLM permitting/leasing actions to hold public hearings as part of their public engagement and permitting process. Public hearings are not a regulatory requirement for processing BLM ROWs. These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site.
366	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	With regards to the Draft EA itself, BLM failed disclose and evaluate the whole of the Project's impacts on the climate, air quality, seismicity, water resources, cultural resources, protected species, and more. BLM also erroneously excluded several crucial and foreseeably significant issue areas from analysis based on the false belief that it need only review "truly significant" issues. NEPA contains no "truly significant" standard by which an agency may exclude issues. BLM must analyze the issues it erroneously excluded that have foreseeable impacts, such as safety, water quality, and wildlife.	The CEQ regulations in effect during preparation of the Draft EA (40 CFR Parts 1500–1508, rescinded April 11, 2025) state that issues may be identified through scoping, and that only those deemed significant should be the focus of the environmental analysis. This principle is reinforced by the U.S. Department of the Interior's NEPA procedures (516 DM 1, July 2025), which direct agencies to concentrate their analysis on potentially significant impacts and to provide a concise evaluation of those effects. In alignment with these requirements, the BLM updated Section 1.6 of the EA to clarify that the analysis was focused on issues determined to be significant to the proposed action and its alternatives. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
367	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Because of the foreseeable direct, indirect, and cumulatively significant impacts of this Project, BLM must conduct a full Environmental Impact Study (EIS). For example, the direct greenhouse emissions of the project amount to burning millions of pounds of coal. This is a significant impact obscured by the Draft EA and that warrants an EIS. We also recommend that BLM halt its review until relevant rulemakings (such as for CO2 pipelines) conclude. Ultimately, because this Project's significant impacts and its role in enabling fossil fuel infrastructure, we urge BLM to reject the Project application altogether.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. EA Section 3.2 describes regional ambient air quality, potential impacts to air resources, and greenhouse gas emissions from the proposed action. Table 3-3 provides estimated emissions for criteria pollutants, HAPs, and GHGs from construction activities for each ROW Group, and Table 3-4 provides estimated emissions for the operational and monitoring periods. Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities. If federal, state, and local governments implement new regulations that the Project would be subject to, Denbury would be responsible for compliance with all current regulatory requirements, including any new PHMSA rule(s), at that time.
368	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Finally, it was improper for BLM to exclude foreseeable impacts from analysis in the Draft EA based on the fictious standard that it was required to analyze only "truly significant" issues. NEPA contains no "truly significant" standard—it asks only whether issues are "likely" to be significant. We expand on this legal error later in this comment letter and further assert that many of the issues BLM excluded warrant analysis in an EIS.	The CEQ regulations in effect during preparation of the Draft EA (40 CFR Parts 1500–1508, rescinded April 11, 2025) state that issues may be identified through scoping, and that only those deemed significant should be the focus of the environmental analysis. This principle is reinforced by the U.S. Department of the Interior's NEPA procedures (516 DM 1, July 2025), which direct agencies to concentrate their analysis on potentially significant impacts and to provide a concise evaluation of those effects. In alignment with these requirements, the BLM updated Section 1.6 of the EA to clarify that the analysis was focused on issues determined to be significant to the proposed action and its alternatives. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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369	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Center for Biological Diversity et al.'s scoping comment attached a letter EPA submitted to BLM during review of the Shute Creek 5-2 Disposal Well Pad and Pipeline project in Wyoming. The Shute Creek and Snowy River project share several similarities, such as the nature of the surrounding environments and the shared need for permits from the EPA to drill Class VI injection wells. EPA's recommendations in its Shute Creek letter should have been considered by BLM here. First, EPA recommended that an EA for a carbon injection project on public lands should not be narrowly focused on the activities directly permitted by the ROW but, instead, should consider operations that are "outside of the direct ROW application that is the focus of the EA." EPA was clear that BLM's NEPA analysis should include "contextual information that is connected to the action" such as "the current emission point of any vented CO2," "the constituents of the CO2 stream according to gas analysis," and other baseline specifics. This information is, according to EPA, "a key point for public transparency and understanding of the action's indirect impacts." Instead of providing sufficient baseline and contextual information, BLM has provided only enough information to make it clear that this Draft EA is narrowly focused on the activities specifically permitted by the ROW. The Draft EA mentions only in passing that this injection site would be linked into the preexisting pipeline infrastructure that connects the Bell Creek Oilfield in Powder River County, Montana, to the CCA Enhanced Oil Recovery unit development in Fallon County, Montana. It does not, for instance, contain any discussion of the Greencore Pipeline with which this project could be tied to and which has faced skepticism around its safety. To align with EPA's recommendations, BLM should have provided contextual information detailing how this CO2 pipeline, and the two facilities it connects with, are currently operating and how their operations would change were the project to go forward. In particular, the Draft EA should have discussed how emissions and other environmental impacts from these facilities are likely to change with or without the proposed project. For instance, if the construction of the Snowy River project would allow these other sites to operate longer or at a higher capacity, the Draft EA should explore those direct and indirect impacts. Instead, BLM offers no more than the acknowledgement that other facilities are connected.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See EA Section 3.6 for additional details. As noted in EA Section 4.2, the BLM has been in close coordination with State of Montana and EPA Region 8 staff regarding the BLM NEPA review process to ensure consideration of the State permitting and EPA UIC permit requirements and permit review process. In particular, EPA UIC Class VI permit reviews are site specific well reviews determined to be functionally equivalent to NEPA reviews and are thus exempt from NEPA review requirements, unless triggered by another statutory requirement (e.g., NHPA). Analysis of another agency's permitting action that has not been proposed/applied for yet (i.e., EPA UIC Class VI permit), and will be analyzed in detail by the permitting agency using current data, would be outside of BLM's jurisdiction. The BLM did, however, analyze the connected action of surface disturbance on State and private lands and associated emissions from drilling and operation of EPA UIC Class wells from issuing a BLM ROW. See EA Section 2.1 where tables include surface acres on State and private lands and Section 3.2.3 for air resources analysis. Denbury's proposal includes all spatial and temporal components which allows for a comprehensive environmental analysis of connected actions associated with issuance of the BLM ROWs, and avoids NEPA piecemealing analysis. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As stated above, EPA would conduct site-specific reviews per well which would be equivalent to NEPA reviews. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to provide further clarification of why upstream emissions sources are not included in the analysis. Because the CO2 sources are unknown, assuming the location, type, and quantity of facilities that may elect to secure a contract with Denbury to transport and sequester CO2 would be speculative and not represent a meaningful analysis of actual or estimated cumulative air quality impacts. Therefore, because the CO2 sources are unknown, the properties of the CO2 stream are also unknown. POD Section 3.2 discloses that the injectate would originate from the Denbury CCA Pipeline, transporting CO2 which has been processed to remove contaminants including water, hydrocarbons, and hydrogen sulfide. Moreover, 40 CFR §261.4(h) states that CO2 streams captured and transported for purposes of injection into an underground injection well are not a hazardous waste, provided certain conditions are met. The CO2 stream must be transported in compliance with USDOT requirements, injection of the CO2 must be in compliance with Class VI UIC well requirements, and no hazardous wastes can be mixed with or otherwise co-injected with the CO2 stream. Both the CO2 generator and the Class VI UIC well owner and operator must certify that the CO2 stream meets these conditions. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. The existing CO2 pipeline currently transporting CO2, and associated EOR facilities, are independent of this Project.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
370	Not Provided	Before a project this size I think an environmental impact statement is crucial.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
371	Individual	Our organizations, and our industry as a whole, have serious concerns about the process by which this project was brought forward. To begin with, there was no communication with the C & B Grazing District. The entire grazing district is included in this project area, and the agency did not reach out to offer information or ask questions. The value of grazing districts is to allow producers to discuss ideas, projects, and ensure that they are able to effectively utilize the excellent grazing lands for years to come. In not extending professional courtesy, this proposal now flies in the face of the communicative attitude the agency believes they have. The agency's dismissal of stakeholder opinion has continued as the second meeting in Ekalaka on March 4, 2024, was 24 minutes. Attendees were told because the meeting had to be exactly the same for the in-person and virtual option, the staff could not take any questions or comments. If in fact this was the reason for not taking questions, the abbreviated meeting exhibited BLM's disinterest in ensuring the community was informed and communicated to by the industry.	Coordination in accordance with the MOU was not triggered as the environmental review for this project is an EA and not an EIS, and the BLM determined the surface disturbing activities along with committed measures and design features would not result in changes to grazing permits or improvements. EA Section 1.7.1 discusses the minimal disruption the Project would have to grazing/ranching. The phased construction and operation over a 20-year period and committed measures outlined in the POD would not result in changes to existing grazing permits. There are currently 17 grazing allotments with a total of approximately 14,000 permitted BLM AUMs where surface ROWs are proposed. Of the 17, 14 allotments would have negligible AUMs, less than 1 percent in each allotment, affected as a result of the proposed permanent ROWs. The 17 allotments would have a combined total of 56 AUMs disturbed due to temporary disturbance from pipelines and short-term ROWs for workspace. Therefore, the BLM does not expect short or long-term disturbance from this project to necessitate changes to authorized grazing (changes to AUMs) in order to meet land health standards or other resource objectives. Permittees and landowners in and adjacent to the project area were included as part of the NEPA public engagement process. The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). There are regulatory requirements for specific BLM permitting/leasing actions to hold public hearings as part of their public engagement and permitting process. Public hearings are not a regulatory requirement for processing BLM ROWs. These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.

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372	O'Grady, Morgan; Western Environmental Law Center et al.	As referenced above, and for the reasons explained below, this Project warrants a more fulsome review under the National Environmental Policy Act of 1976 ("NEPA") using an Environmental Impact Statement. Specifically, BLM must complete an analysis of the upstream, downstream, and cumulative greenhouse gas emissions associated with the gas processing facilities from which the CO2 for the Project will be sourced. Similarly, BLM must consider the Project's economic viability in light of the time-limited nature of the 45Q tax credit. Conservation Groups emphasize that the Project—which contemplates the removal of extremely CO2-rich gas from the LaBarge field and subsequent processing, sequestration, and use for further oil recovery of the very same CO2, largely at taxpayer expense—does not mitigate climate change. Instead, the Project extends the lives of gas processing facilities with known track records of venting significant amounts of greenhouse gases to the atmosphere and facilitates continued oil and gas extraction using enhanced oil recovery. In light of these facts, Conservation Groups request that: 1. BLM should perform an environmental impact statement for the Project, rather than an environmental assessment; 2. BLM should identify and analyze upstream, downstream, and cumulative emissions; 3. BLM should take a hard look at human health and safety impacts associated with the Project; and 4. BLM should analyze the long-term economic viability of the Project, to avoid stranded assets and waste of taxpayer dollars. Failure to analyze these factors constitutes a derogation of BLM's duty under the National Environmental Policy Act to look before it leaps, and to ensure that it is fulfilling NEPA's dual purpose of informing the agency and the before an irretrievable commitment of federal resources.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. See EA Section 3.2 for air resource and greenhouse gas emissions analysis which includes direct, indirect, and cumulative impacts from the alternatives. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
373	Montana Wildlife Federation	BLM failed to provide adequate and informative public involvement from the start of this project as broadly directed by CEQ's Interim "Carbon Capture Utilization and Sequestration Guidance," which is described as a pre-requisite to permitting, critical and frequent community engagement when considering this new technology. Subsequently, it was a shockingly egregious action when BLM began working on this proposal before authorizing guidance, BLM IM 2022-041, over two years ago. And further shocking that BLM then made no effort to inform the Ekalaka community and the broader public of the consequential project within this early timeframe. It was a particularly errant choice given the complexity of the proposal and the new technology, effectively informing the public that BLM had no intention of providing informative, adequate, or engaged communication regarding this proposal. Subsequently, as only the second BLM-authorized Carbon Sequestration project in the western United States and the first in Montana, BLM incredulously came up with an initial 30-day comment period and offered only one public meeting. Strangely, if not inappropriately, the action describing precisely what this proposal is should be mentioned in the text of the documents provided for public review: the use of the public domain for permanent federal underground pore space for sequestration of CO2. MWF agrees with the letters submitted from other conservation organizations that there has been inadequate public engagement. Because of this absence of basic public engagement protocols, we cannot support the project as having met NEPA sufficiency. The timeframes and limited review opportunities challenge MWF, and we are also disturbed by the approach that BLM has taken at all levels of public engagement regarding carbon sequestration. Because of these numerous public involvement faults, BLM must reinitiate this process with full and effective communication, public meetings, and field trips and must be open to other points of view as there is little evidence any changes have been made between the initial proposal and the completed EA. This lack of public engagement does not meet the basic requirements of NEPA.	As stated in EA Section 1.1, the SF-299 application and preliminary POD submitted in November 2021. Project was refined using 2022 and 2023 survey data to meet 2015 MCFO RMP requirements, avoid and/or minimize disturbances to sensitive resources, and to make use of previously disturbed areas to the extent practicable. EA Section 1.1 has been updated to clarify the application was deemed complete on September 8, 2023 when an updated POD was submitted, allowing BLM to initiate NEPA review process and public engagement. The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). There are regulatory requirements for specific BLM permitting/leasing actions to hold public hearings as part of their public engagement and permitting process. Public hearings are not a regulatory requirement for processing BLM ROWs. These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document. For both scoping and public comment periods, there were opportunities to submit comments in writing (mailed or hand-delivered) to the MCFO or electronic via the BLM e-Planning project site. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
374	Barbour, Drew	This project is being pushed through so fast that community members don't have a chance to read, understand, reach out, connect, etc... March and April is calving season here in Eastern Montana. Ranchers did not have a chance to do all of those things in 60 days while calving. BLM/Denbury/Exxon's Public Process- A Stonewalling Mission. The underlying message is that this project will go through and BLM is going through the phases to issue a ROW. The "public" meeting was a 15 minute presentation, followed by a "go around the room and talk with each contributor about this project". The public meeting was supposed to be PUBLIC-not individual meetings where we weren't allowed to hear our community members questions; ones we may not have had. Also, the EA "contributors" were all employed by the BLM and Exxon, not a third party. How is that a fair and accurate review when the governments pockets are lined with oil and gas money & climate crisis is a federal agenda?	The BLM is completing the EA and public engagement in accordance with NEPA regulatory requirements. The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). There are regulatory requirements for specific BLM permitting/leasing actions to hold public hearings as part of their public engagement and permitting process. Public hearings are not a regulatory requirement for processing BLM ROWs. These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.

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375	Shantel	Regarding the Ekalaka meeting on March 5, 2024 and virtual on March 6, 2024). Many of the attendees showed up anticipating a traditional public hearing where they could speak and listen to the concerns of their neighbors. I personally made a 4 hour round trip to Ekalaka in the middle of calving heifers, for what I would say was a complete waste of time. There was a great turnout at the meeting and it was a complete missed opportunity and insult to everyone who made the long drive and took the time to show up. Having a BLM spokesperson at each table answering questions (or just directing you to the next table and saying that's not my department, was extremely frustrating.) There was no open microphone. Both the Ekalaka and virtual meetings were said to be public. How is that a real public meeting? When everyone isn't allowed to hear all the conversations and questions being asked and the ones going unanswered, that to me is not public. And same for the virtual meeting there was no way to see the questions being asked, the questions going unanswered or any way to respond to anything unless you typed it in the q and a box, which wasn't working on my end and I had no way to communicate that. I'd just like to know how those meetings are considered to be public? Why they were set up in that format? I feel we deserve a real public meeting for all discussion, not just a one sided blm/denbury meeting with no open communication.	The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). There are regulatory requirements for specific BLM permitting/leasing actions to hold public hearings as part of their public engagement and permitting process. Public hearings are not a regulatory requirement for processing BLM ROWs. These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document. For both scoping and public comment periods, there were opportunities to submit comments in writing (mailed or hand-delivered) to the MCFO or electronic via the BLM e-Planning project site. Scoping comments and process are detailed in a scoping report, and all project materials are available on the BLM e-Planning project site.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
376	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM's Public Processes Have Been Deficient. There are many concerns about the local impacts of the Project and about deficiencies in the public process during the scoping and EA comment periods. The public meeting took place Thursday, October 12, 2023, from 4-6 p.m. at the Ekalaka Event Center. The meeting's purpose was to provide information and gather comments on the proposed Snowy River CO2 Sequestration Project. At the meeting, the public learned that Denbury originally notified BLM and began their plan of development (POD) in November 2021. After two years of BLM and Denbury working together, BLM released the POD in October 2023. The POD is highly technical, over 100 pages long, contains numerous appendices, and yet, BLM originally only gave the local community 30 days to review it for scoping comments. From the start, local community members felt that their input was not a valued part of BLM's scoping or decision making process. At the meeting, BLM only put out 15 chairs while about 60 concerned residents showed up. BLM also scheduled the meeting during early evening hours on a weekday, which prevented many concerned residents from being able to attend. Several residents commented that it felt like BLM was selling the project rather than making a good faith effort to inform the public. Attendees of the meeting voiced almost unanimous opposition to the project. Residents in the room stood up several times to say that nobody in the community wanted this to happen and voicing concerns about a number of issues, including: • Potential short-term and long-term threats to water quality and quantity; • Disruption to landowners and agricultural operations in the area; • No apparent benefits to local government, county, or community; and • Safety risks. The initial BLM scoping meeting is a microcosm of a larger problem. As with many industries, decisions about the land are made without the consultation of the community. It appears here, for example, that officials in Washington, DC decided that carbon sequestration was a good idea and it made it a priority. Then, it seems as if an engineer at Denbury's headquarters in Plano, TX saw a large chunk of contiguous BLM land near an existing pipeline in rural eastern Montana and decided it would be great for a sequestration project. Many local residents have stated that it feels like eastern Montana is being used as a sacrifice zone to support industry profits for large corporations like Denbury/Exxon Mobil. As local rancher Mike Hansen put it, "If this comes up and contaminates our water, we are out of business. The bank will foreclose on us." BLM's public meeting for the Draft EA occurred on March 5, 2024, from 5-7 p.m. at the Ekalaka Event Center. Rather than providing an open forum for the public to ask questions, BLM split the crowd into small groups in a separate room. As a result, members of the public were prevented from hearing their neighbors' questions and concerns. Again, the BLM made residents feel as if their concerns were not important. Regarding extension requests, Northern Plains Resources Council submitted two requests, including one from local landowners seeking 90 days for comment. While we appreciate that BLM granted a 30-day extension, this was simply not enough. As noted in Ms. Barbour's op-ed, "Expecting a ranching community to digest hundreds of pages of technical, quantitative government documents within a month, during calving season, is inadequate and insulting."	As stated in EA Section 1.1, the SF-299 application and preliminary POD submitted in November 2021. Project was refined using 2022 and 2023 survey data to meet 2015 MCFO RMP requirements, avoid and/or minimize disturbances to sensitive resources, and to make use of previously disturbed areas to the extent practicable. EA Section 1.1 has been updated to clarify the application was deemed complete on September 8, 2023 when an updated POD was submitted, allowing BLM to initiate NEPA review process and public engagement. The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). There are regulatory requirements for specific BLM permitting/leasing actions to hold public hearings as part of their public engagement and permitting process. Public hearings are not a regulatory requirement for processing BLM ROWs. These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document. For both scoping and public comment periods, there were opportunities to submit comments in writing (mailed or hand-delivered) to the MCFO or electronic via the BLM e-Planning project site. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
377	Individual	After reviewing the proposed CO2 sequestration project, I hope there are enough sensible people at BLM to reject the applicant's request. The people of Montana understand the impacts of their plan. Subsidizing Big Oil in their attempt to dump industrially-generated CO2 into our ground water and under our prairies is a nasty business. Stop encouraging this fading industry and stop supporting it with public funds. Yes, the oily shareholders will whine and moan. They are a class of folks who don't care about Montana and its people. That is why they came up with this proposal. There is more we can do with public funding to develop alternatives. That is where effort should be placed. I suggest Denbury Inc. build the project in Plano Texas where the company is based. They can capture all the CO2 they want and store it under their office building. Leave Montana out of this plan to transfer CO2 into our ground water and under our Big Sky.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Figure 3 in EA Appendix D shows the project sequence associated with BLM, EPA, and State of Montana. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury will secure associated with the project. As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal direct and indirect effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. The Project is not federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
378	Millbrooke, Anne	The solution is cut carbon emissions! The solution to carbon pollution is NOT to store carbon, a process that, as is obvious in this proposal, would involve the release of a lot of carbon in road building, other construction, extension and use of electricity, capture and transportation of the carbon, vehicle travel on the site. Natural gas as a bridge to clean energy failed spectacularly because it did not cut emissions. Thus far carbon capture and storage has failed. Since this project is designed to prop up dirty energy companies operations, it is not a solution. It is clear that the Snowy River Carbon Dioxide Sequestration Project threatens to harm our communities, public lands, working lands, and the broader public. And it is obvious that this sequestration project is not a solution to the problem of carbon pollution. Please deny Denbury's application for a right-of-way (ROW) permit and to choose Alternative 1 - No Action.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, including the no action alternative (Alternative 1) and the proposed action (Alternative 2). The environmental effects of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
379	Individual	The potential benefits of this project do not outweigh the risks. I know that it is federal policy to encourage sequestration projects. However, locating them on undisturbed ground is counterproductive. They should be located on existing oil fields.	As described in EA Section 2.1 and POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, including the no action alternative (Alternative 1) and the proposed action (Alternative 2). The environmental effects of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e. other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
380	Barbour, Drew	The REAL Solution- Carter County is 2 million acres and has 1,300 people. The rangelands we steward draw down and sequester more carbon than our community creates; making up for CO2 emissions elsewhere. Prairies, like those in Eastern Montana, can sequester up to .5 ton per acre per year. My ranch and the project area combined would draw down 1.5 million tons of CO2. This number does not include my impacted neighbors. This liquid CO2 is coming from WY. They can keep it and "sequester" it there. CCS is not a SOLUTION, it is a bandaid to a problem. The government needs to put production regulations on Big Oil and engage diverse professionals across all fields into the conversation. We are already drawing down here in Carter County Montana. If they want to continue producing, they can find a way to pump it beneath their own homes. At the very least, this project constitutes completion of an Environmental Impact Statement via third party contributors.	Development of policies and regulations is outside the scope of this EA. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. The Project would result in minimal surface disturbances that would affect the capacity to act as a natural sink for CO2. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Table 10-1 of the BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends (2023) lists the average carbon sequestration capacity on a per acre basis that occurs on Federal lands for each state. These data are derived from the USGS's *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14* (2018) report on federal emissions and sinks. The average acre of federal land in Montana sequesters -0.69602 metric tons of carbon per year. For the 46 acres of federal land that would be converted to gravel cover and new two-tracks during Project operation, the Project would result in a loss of capacity to naturally sequester approximately 32 metric tons of carbon per year. Over a 20-year injection period, this equates to 640 metric tons of carbon sequestration, which is significantly less than the 150 million metric tons of CO2 that the Project may sequester. At the end of the project's life, these 46 acres would be reclaimed and the lands' capacity to act as a natural carbon sink would be restored. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
381	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM must provide a range of alternatives to "inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts." BLM fails this fundamental requirement by offering only two alternatives: No Action and the Proposed Action. This is not a reasonable range of alternatives and fails to offer any meaningful choice as far as where the proposed Project may be sited, its size and scale, and other features. BLM constrains its analysis by artificially narrowing the Project purpose and need. According to the Council on Environmental Quality (CEQ), "[t]he purpose and need statement explains to the reader why an agency action is necessary, and serves as the basis for identifying the reasonable alternatives that meet the purpose and need." The Draft EA states that the purpose is "for the BLM is to respond to the SF-299 application submitted by Denbury." This falls short of the CEQ's direction that the statement should explain why the action is necessary and identify reasonable alternatives. Denbury's project purpose in its Plan of Development fares no better (and cannot replace BLM's Draft EA duty anyways.) Denbury vaguely alludes to the assumption that CCS is a necessary climate solution, asserting that the Project "is intended to help meet the Administration's goals and priorities by providing a solution to reduce carbon emissions for multiple industries and to enable Denbury to meet its pledge to fully offset its CO2 emissions by the end of 2029." But there are many ways to "help meet the Administration's goals and priorities by providing a solution to reduce carbon emissions," and as described in the Center for Biological Diversity et al.'s scoping comment, CCS over-promises on its potential as a climate solution and may even lead to increased carbon emissions and other harmful effects. BLM's analysis of Project alternatives analysis must not assume that CCS is the best option to meet the Project purposes. Alternatives here must also consider factors beyond what led Denbury to propose the Project location. According to the company, the Project location and subsurface pore space formation were chosen due to: • Proximity to existing pipelines and CO2 sources; • Reduced number of affected landowners; • Low mineral development potential in the Project area; • Suitable reservoir porosity, capacity, and seal continuity; and • Low risk of seismic activity. Notably absent from Denbury's list are environmental and various other risk considerations. For example, nowhere in that list does Denbury consider potential (and possibly irreversible) impacts to species (included species listed under the ESA), harms to wetlands and other water resources, and risks to humans.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project. Denbury submitted an SF-299 application proposing ROWs (surface and pore space) in Carter County, Montana on BLM lands to sequester CO2 through an EPA UIC Class VI permit. Therefore, the BLM initiated NEPA with the purpose and need for the action to respond to the pending application requesting ROWs in Carter County, Montana for sequestering CO2 through an EPA UIC Class VI permit in accordance with the 2015 MCFO RMP, FLPMA ROW policies and regulations. The range of alternatives includes two alternatives for detailed analysis. Alternatives were based on resource issues identified during scoping. No additional alternatives that met the purpose and need were identified by the public at that time. Section 2.2 of the EA summarizes an alternative considered but eliminated from detailed analysis, the initial Project submitted in November 2021, as it did not meet the 2015 MCFO RMP requirements to avoid and/or minimize disturbances to sensitive resources. Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e. other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. The MCFO interdisciplinary team considered the Montana Natural Heritage Program database, USFWS IPAC database, internal BLM data, staff expertise, and other information, as appropriate, to determine if special status species or associated habitats are known to occur or could occur in the Project area. As disclosed in EA Section1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan. The BLM determined that impacts to wildlife (except sage-grouse), fisheries, including special status species, and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. EA Section 4.2 was updated to clarify that the BLM coordinated with USFWS on the project, which did not include informal consultation. Also, EA Section 4.2 discloses coordination with USFWS. Based on the May 4, 2022 letter, the USFWS indicated that additional efforts for protected butterfly species (Dakota skipper) would not be needed for the Project. However, for the NLEB, the BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on NLEB. As disclosed further in Section 4.2, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect the NLEB, other listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
382	Simmons, Patricia	Why are you spending millions of dollars for an industrial site, spoiling this area for centuries. It is much cheaper to utilize conservation, wind, solar, thermal methods that we have lots of experience with and we know they work. Using coal, oil, gas, methods which also damage the Earth, the air, health, waterways, roads, wildlife, etc. Carbon sequestration is no better. You should spend the money improving and replacing the electrical long range systems and storage of energy all over the US using new technologies, and connecting the entire United States with reliable and 24x7 energy.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The Project is not federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
383	DiMarco, Jerry	Since there are other uses for extracted CO2, such as converting it to carbon and oxygen, or other molecules used in chemical or manufacturing processes, we should instead use the captured CO2 rather than sequester it. The savings would be enormous, and the sustainability of this approach would be much more believable.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The Project is not federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.

384	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM Must Disclose and Analyze the Whole of the Project's Impacts to Avoid Unlawful Piecemealing. NEPA requires federal agencies to analyze potentially significant environmental consequences before initiating actions that might affect the environment. An agency impermissibly "segments" NEPA review "when it divides connected, cumulative, or similar federal actions into separate projects and thereby fails to address the true scope and impact of the activities that should be under consideration." A project without "substantial independent utility"—such as ROWs on their own, or injection wells without consideration of the requisite pipelines—cannot be segmented from the larger project as a whole. The activities are "inextricably intertwined" and require a unified NEPA review. Despite this legal requirement, the Draft EA repeatedly errs by failing to disclose and analyze upstream activities and major Project activities. BLM must not only analyze the impacts of granting ROWs (though the Project's impacts to the proposed 100,000 acres of federal pore space certainly must be addressed); BLM must also disclose and analyze the totality of the Snowy River Carbon Sequestration Project's activities on the climate, air quality, community and wildlife safety, and more. For example, BLM must disclose and analyze the impacts from the Project's CO2 pipelines (and possibly other CO2 transport methods) that span state lines from Montana into Wyoming. BLM must also disclose and analyze the upstream sources of CO2 which, contrary to claims in the Draft EA, include the Shute Creek and Lost Cabin gas plants, as affirmed by Denbury itself. Further, the "whole of the project" requirement is not just limited to project infrastructure and activities; it also embodies a temporal requirement. For example, the Project will inject "approximately 450 million cubic feet [of CO2] per day over the course of 20 years." And as required by federal regulations and referenced in the Revised Plan of Development, postinjection site care can last up to 50 years. BLM is therefore required to analyze impacts for the lifetime of the injection period, as well as the post-injection site closure period that can span 50 years. With these impacts being foreseeably significant, BLM must conduct this analysis within a full EIS.	The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Analysis in EA Section 3 included impacts from the proposed pipelines. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies. Figure 3 in EA Appendix D shows the project sequence associated with BLM, EPA, and State of Montana. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project. As noted in EA Section 4.2, the BLM has been in close coordination with State of Montana and EPA Region 8 staff regarding the BLM NEPA review process to ensure consideration of the State permitting and EPA UIC permit requirements and permit review process. In particular, EPA UIC Class VI permit reviews are site specific well reviews determined to be functionally equivalent to NEPA reviews and are thus exempt from NEPA review requirements, unless triggered by another statutory requirement (e.g., NHPA). Analysis of another agency's permitting action that has not been proposed/applied for yet (i.e., EPA UIC Class VI permit), and will be analyzed in detail by the permitting agency using current data, would be outside of BLM's jurisdiction. The BLM did, however, analyze the connected action of surface disturbance on State and private lands and associated emissions from drilling and operation of EPA UIC Class wells from issuing a BLM ROW. See EA Section 2.1 where tables include surface acres on State and private lands and Section 3.2.3 for air resources analysis. Denbury's proposal includes all spatial and temporal components which allows for a comprehensive environmental analysis of connected actions associated with issuance of the BLM ROWs, and avoids NEPA piecemealing analysis. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As stated above, EPA would conduct site-specific reviews per well which would be equivalent to NEPA reviews. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
See Previous Page	*See Previous Page*	*See Previous Page*	(May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.
385	Wade Sikorski	This is a comment on the Snowy River Carbon Sequestration Project. I continue to believe that the BLM should calculate the Energy Return on Investment for the project. Here's an editorial I wrote: All dogs go to heaven, but not all dogs are good dogs on earth. Some dogs are very helpful, like the dogs that herd cattle or protect sheep from predators. But other dogs, not so much. They chase the postman up a tree, bark at the moon all night, and pee inside the house. Denbury, formerly the owner of the Baker oilfield, now a subsidiary of Exxon, is proposing the Snowy River carbon sequestration project in Carter County. It will be built mostly on 100,000 acres of Bureau of Land Management land. Exxon will inject approximately 150 million tons of carbon dioxide over 20 years a mile beneath the surface of Carter County. This is the equivalent of the greenhouse emissions of 1.6 million cars. I want to know what kind of dog Denbury and Exxon are trying to get us to adopt. Is it a good dog, the kind that herds livestock? Or is it the kind of dog who gets nothing done because it is too busy chasing his tail? That might be the metaphor that best captures what Snowy River will be--a dog chasing his own tail. Here's why: It takes energy to make energy. If we spend a lot of energy making energy, it drains the rest of the economy of resources, and we have little energy left for things like growing food, traveling places, heating houses, and lighting buildings. After the energy in coal is made into electricity and gets to your light bulb, it ends up producing only ten times as much energy as it took to produce it. That isn't a dog chasing its own tail--coal generation is getting stuff done. However, is that still the case if we start using a lot of energy to capture the carbon dioxide at the coal plant, compress it, transport it hundreds of miles away through a pipeline, and then inject it a mile underground? Will we have enough energy left over to run our economy? Or will we only be producing energy to produce energy? I think this is a crucial question that needs to be asked about Denbury's Snowy River project. Is it going to be nothing but a dog chasing its tail? It is very possible. Carbon sequestration aims to reduce greenhouse gas emissions, which is a good thing, but to get it done, we will have to mine more coal and drill for more gas to do it, increasing the amount of carbon dioxide produced. Doing carbon sequestration means producing more energy just to produce energy. Energy experts call the relation between the energy produced and the energy it takes to produce it the Energy Return on Investment, or EROI. Once the energy from coal makes it to your light bulb, losing a lot of energy at the generating plant and more going through the wires, the EROI of coal is around ten, maybe only seven, depending on the expert and the specific process. So, we use one unit of energy to produce ten, and we have nine units left over to run our economy. However, if we start doing carbon sequestration, we might not have enough energy left over to keep our economy going. The energy we produce will be going in circles, produced just to produce energy, and there won't be enough left over for us to use for other purposes. Solar panels have an EROI of about ten. Wind farms have an EROI of about 20. Since wind and solar farms do not use fossil fuels to produce electricity, all of the energy they produce goes directly to us. Yes, the climate crisis is real, and we must do something about it, but carbon sequestration is not the solution. We need energy sources with a good EROI, like solar, wind, and hydro. If we start using carbon sequestration to keep using fossil fuels, we will likely have little left to grow food, run our factories, and heat our houses. The BLM recently conducted a scoping hearing and invited public comment on the Snowy River project proposed in Carter County. I asked the BLM to calculate the Energy Return on Investment for it. However, the BLM said my request was outside the scope of comment and refused to include my comment in its summary. For my life, I can't imagine anything more relevant to know about the Snowy River project, except, of course, whether it will leak. We need energy sources that will do useful things for us, not just make profits for Exxon. If carbon sequestration turns fossil fuels into a dog that does nothing but chase its tail, we need to know that. So how about it? How about calculating the EROI of Exxon's carbon sequestration project in Carter County? We need to know if the dog Exxon is trying to get us to adopt is just going to go in circles.	Analysis to determine the energy return on investment (EROI) is out of scope of this EA. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The ROWs are not proposed for generating a source of power. In addition, conducting empirical research for Carbon, Capture, Utilization and Sequestration processes is not required by NEPA. The BLM ROWs are processed in accordance with FLPMA and the 2015 MCFO RMP, and require numerous federal, state, and local permits, which include an EPA UIC Class VI permit prior to use of the ROW to inject CO_2 into the underground pore space. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
386	Not Provided	Do not allow Exxon to use tax credits intended for impactful climate action, as a loophole for a dangerous activity that only helps a corporation seeking the highest short-term profits. One important question to ask Exxon "How does this project help the environment in Montana.?"	The Project is not federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal direct and indirect effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
387	Not Provided	This project seems incredibly inefficient. While it would provide a lot of jobs, I feel that funding sources could be used more effectively if sequestering carbon is the goal.	The Project not federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
388	Montana Wildlife Federation	Most critically, BLM has not addressed the heart of the proposal, which is its dependence on a debatable, scientifically questionable, and unproven technology whose effects are certainly unknown and speculative at best (The False Promise of Carbon Capture as a Climate Solution, Scientific American, Naomi Oreskes, How Does Carbon Capture Work, NYTT, Eden Weigart, amongst others). The litany of issues regarding this technology and the true intent of proponents deserve further investigation and answers before a decision to permit.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details.
389	Concerned conservationist	I appreciate this opportunity to provide comments on this important proposed action and NEPA process. At the outset, I believe that this and other federal planning and NEPA analysis processes should actively consider how the proposed action and alternatives may add to or help solve the climate and extinction crises. These overlapping crises pose an existential threat to humanity and the health of the biosphere. On the climate crisis, please review the attached IPPC report. This report summarizes the overwhelming international scientific consensus on the severity of the climate crisis and the urgent need to phase out the use and development of fossil fuels. On the extinction crisis, there are an increasing number of scientific reports on the rapid loss of biological diversity and how this loss undermines the stability, resilience, and productivity of the ecosystems upon which life on Earth depends. Overall, this compelling science demonstrates the urgent need for bold and innovative solutions. Questions arise like: how can fossil fuel use be reduced and replaced by clean, renewable energy sources? How can any destruction, degradation, or fragmentation of wildlife habitat be avoided, reduced, or successfully mitigated? How could construction materials be sourced from sustainable producers and practices? How could the use of any toxic chemicals be replaced by safer alternatives? How could gains in energy and water conservation be achieved? How could any harmful invasive plants be prevented, controlled, reduced, or eradicated? Please consider these questions in moving forward. On this specific proposed action, I support it so long as it would safely and securely store this carbon dioxide without any potential for future harmful releases. I applaud all efforts to fight the climate crisis!	Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
390	Catherin-Sauer, Augusta; Northern Plains Resource Council	Congress requires that federal agencies prepare an EIS when a major federal action has a "reasonably foreseeable significant effect" on the quality of the environment and human environment. In other words, the significant effect need only be foreseeable; meaning, any "likely" direct, indirect, or cumulatively significant effect triggers the need for an EIS. In contrast, an EA is appropriate only when an action "[i]s not likely to have significant effects or the significance of the effects is unknown and is therefore appropriate for an environmental assessment." The term "significantly" as used in NEPA is defined in the Council on Environmental Quality's (CEQ's) regulations. The cost on public health is potentially significant. There is ample evidence that the Project—which will span at least 20 years (not including the 50 for post-injection monitoring), impact 100,000 acres of federal lands, and involve 15 injection wells and 40 miles of new pipeline—will foreseeably impact the environment in significant ways. The Project's Draft EA and Revised Plan of Development describe ground disturbance activities that irrefutably will have foreseeable direct, indirect, and/or significant impacts on agriculture, wildlife habitat, vegetation, water features, and more. Examples from the Draft EA itself include: o Denbury will drill 15 injection wells, each requiring a well pad measuring 300x300 feet (approximately 2.1 acres each). o The CO2 pipelines will further alter and disrupt the land, requiring a 50-footwide permanent right-of-way (ROW) with a 25-foot-wide short-term ROW. o The Project will require constructing 57 miles of new access roads, with 25- and 60-foot wide ROWs. o The Project will require constructing two pump stations, requiring five-acre sites to be surfaced with gravel, surrounded by six-foot tall chain link fences, and each featuring its own standalone metal office building. o The Project will require 3.6 miles of new transmission lines, which will disturb land along its length with an estimated 100-foot-wide corridor. o For pipelines and other infrastructure, Denbury will construct four new culverts or low water crossings. Any one of these project activities could warrant an EIS on their own; taken together, combined with the environmental setting (a semi-arid, multiple-use region with wildlife and protected species, including priority habitat) and evidence BLM received in the scoping period, it is clear that BLM should complete a full EIS. The Project expects to operate for a 20-year period, meaning impacts to wildlife, vegetation, air quality, water features, and human uses will persist for decades. We would like to highlight the use of an EIS for the Riley Ridge to Nerota project where multiple uses were taken into consideration.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury will secure associated with the project. EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover.

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391	Catherin-Sauer, Augusta; Northern Plains Resource Council	There is ample evidence that the issue areas BLM excluded—including safety, vegetation, wildlife and habitat, and soil resources—are likely to be significantly impacted by the Project. BLM also improperly excludes issues because of other agency permits (e.g., Class VI UIC permits) that may happen in the future, and based on Denbury's promise of certain design features and mitigations. This is one of the first types of this project on public lands in the country and BLM should complete an EIS to address these concerns.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project. EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover.

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392	Dinstel, Dan	I would like to address the fact that a project of this magnitude and scope only warranted an Environmental Assessment. While 100,000 acres slips off the tongue without deep thought this area encompasses 156 square miles. More importantly, the lack of analyzing the full cumulative environmental impacts of many important factors were ignored or used Denbury's answers in lieu of independent scientific data. A fair and impartial environmental evaluation cannot "cherry pick" issues while disregarding others. Only using information that is "truly significant" in BLM's eyes circumvents the entire NEPA process. A full EIS is required for this project.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project. EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover."

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393	O'Grady, Morgan; Western Environmental Law Center et al.	We encourage BLM to exercise its discretion to apply the Phase 2 Rule in advance of the July 1, 2024, date on which it takes effect. Prior to the effective date of the Phase 2 Rule, under the plain terms of NEPA and Secretarial Order 3399, the BLM's NEPA processes for the proposed Project must take place under the CEQ's pre-2020 regulations implementing NEPA as modified by its Phase 1 Final Rule. Moreover, in January 2023, the CEQ issued interim NEPA Guidance on Consideration of Greenhouse Gas Emissions and Climate Change (CEQ Interim Guidance). In the Guidance, CEQ recognizes both the urgency of the climate crisis and its fundamental relevance to NEPA, stating: "The United States faces a profound climate crisis and there is little time left to avoid a dangerous—potentially catastrophic—climate trajectory. Climate change is a fundamental environmental issue, and its effects on the human environment fall squarely within NEPA's purview." 2023 Interim CEQ Guidance at 1197. Importantly, the Guidance directs agencies to analyze both the impacts of a proposed action on climate change, and the impacts of climate change on a proposed action and its environmental impacts. Id. at 1197. "Environmental" impacts under NEPA are broadly defined, and include ecological, cultural, economic, social, health and environmental justice impacts. See 40 C.F.R § 1508.1(g)(4). BLM should ensure that its analysis and disclosure of GHG emissions and climate change impacts adhere to this Guidance. We encourage BLM to apply the NEPA Phase 2 rule for its analysis of the proposed Project. The final rule identifies an effective date of July 1, 2024, but specifies that an agency "may apply the regulations in this subchapter to ongoing activities and environmental documents begun before July 1, 2024." In light of new provisions for the consideration of climate change effects of a proposed action, we request that BLM exercise its discretion to apply the NEPA Phase 2 regulations to the proposed Project. The NEPA Phase 2 rule specifies that an agency must identify the "environmentally preferable alternative." The rule defines this alternative as the one that "will best promote the national environmental policy" expressed in NEPA, by "maximizing environmental benefits, such as addressing climate-change related effects," or "by causing the least damage to the biological and physical environment." This requirement is not new—CEQ regulations have always required the identification of such an alternative in the Record of Decision—but its addition to the Environmental Assessment or Environmental Impact Statement will increase transparency and facilitate public input.	The EA was developed in accordance with all current applicable laws, rules, regulations, and policies.

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394	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Because of the foreseeable direct, indirect, and cumulatively significant impacts of this Project, many of which we described in our initial comment submitted on April 16, 2024, BLM must conduct a full Environmental Impact Statement (EIS). CEQ's revised NEPA regulations further support that an EIS—rather than an Environmental Assessment (EA)—is necessary. This is based on CEQ's "context and intensity" factors, which are meant to guide an agency's determination of whether an EIS is warranted. Based on those factors—such as adverse impacts to safety, unique geographical features, and endangered and threatened species—BLM must analyze the Snowy River Carbon Sequestration Project in an EIS. CEQ's revised regulations also support our arguments that BLM may not exclude issue areas based on the fictitious standard that effects are not "truly significant;" BLM must analyze the whole of the Project and not engage in piecemeal review; and BLM is not permitted to downplay or obfuscate effects simply because the agency may deem the Project to have some benefit. As recommended in our initial comment and reiterated here, even with the need for an EIS, we urge BLM to halt its review until relevant rulemakings (such as for CO2 pipelines) conclude. And ultimately, because this Project's significant impacts and its role in enabling fossil fuel infrastructure, we urge BLM to reject the Project application altogether. Congress requires that federal agencies prepare an EIS when a major federal action has a "reasonably foreseeable significant effect" on the quality of the environment. This foundational tenant of NEPA remains unchanged. NEPA created CEQ, in the Executive Office of the President, to be the "caretaker" of the NEPA. CEQ is responsible for consulting with all agencies on the development of their NEPA implementing procedures and determining that those procedures conform with NEPA and CEQ regulations. BLM explicitly seeks to align its NEPA processes with those of CEQ. On May 1, 2024, CEQ published its final NEPA regulatory revisions. The goal of these revisions is to "to provide for an effective environmental review process; ensure full and fair public engagement; enhance efficiency and regulatory certainty; and promote sound Federal agency decision making that is grounded in science, including consideration of relevant environmental, climate change, and environmental justice effects." It is worth highlighting some of CEQ's changes and why they were made. For example, CEQ restored "Significance determination—context and intensity" to address factors agencies must consider in determining the appropriate level of NEPA review. CEQ noted that "[m]ultiple commenters expressed support for the overall restoration of the context and intensity factors, as well as the proposed expansion of the factors, asserting that doing so aligns with longstanding case law and adds certainty to the process." CEQ further noted that "the concept of intensity and the intensity factors have long provided agencies with guidance in how the intensity of an action's effects may inform the significance determination." One new factor (though it harkens back to the 1978 regulations) to determine whether an EIS is necessary is "the degree to which the proposed action may adversely affect unique characteristics of the geographic area such as historic or cultural resources, park lands, Tribal sacred sites, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas." CEQ notes that the list is illustrative and agencies "can consider other factors in their determination of significance as appropriate for the proposed action." CEQ also now directs agencies to consider the potential global, national, regional, and local contexts, which may be relevant depending on the scope of the action. As part of this, CEQ "reconsidered the statement in the 2020 rule that the affected environment, is 'usually' only the local area, 40 CFR 1501.3(b)(1) (2020)." CEQ is now encouraging agencies to consider impacts beyond the local area "because many Federal actions have reasonably foreseeable effects that extend regionally, nationally, or globally."	Development of policies and regulations is outside the scope of this EA. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. Denbury would be required to comply with all current regulatory requirements for the permits/approvals listed in Section 2.4 of the POD at the time of surface disturbing activities. If federal, state, and local governments implement new regulations that the Project would be subject to, Denbury would be responsible for compliance with all current regulatory requirements, including any new PHMSA rule(s), at that time. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. 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395	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	An EIS "embodies the understanding that informed decisions are better decisions and lead to better environmental outcomes when decision makers understand, consider, and publicly disclose environmental effects of their decisions." If an action is "likely to have significant effects," an EIS is warranted. In considering whether an effect of the proposed action is "significant," agencies shall examine both "context and intensity," using factors listed in the regulations. The Snowy River Carbon Sequestration Project implicates most (if not all) of these intensity factors in local, regional, national, and global contexts, as explained below, meaning BLM must analyze the Project in an EIS. Further, CEQ instructed agencies when "assessing context and intensity, [to] consider the duration of the effect." The Project aims to inject "approximately 450 million cubic feet [of CO2] per day over the course of 20 years." Post-injection site care may then last up to 50 years. BLM's analysis must take the duration of these impacts into account in determining the significance of the action, and then in the EIS itself. Below are examples of Project effects mapped to the intensity factors. The information contained herein also is elaborated on further in our April 16, 2024 comment letter. Other intensity factors listed in the revised NEPA regulations but not elaborated on below may still be implicated and must be considered by BLM.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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396	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The "highly uncertain" factor originated in the 1978 NEPA regulations and is discussed in case law. For example, the Ninth Circuit, in explaining the "highly uncertain" factor, stated: An agency must generally prepare an EIS if the environmental effects of a proposed agency action are highly uncertain. Preparation of an EIS is mandated where uncertainty may be resolved by further collection of data, or where the collection of such data may prevent "speculation on potential ... effects. The purpose of an EIS is to obviate the need for speculation by insuring that available data are gathered and analyzed prior to the implementation of the proposed action." There are numerous instances here where the Project's effects are highly uncertain, in that they may be resolved by further data collection. For example, Denbury surveyed only a small portion of the 110,100 acres of impacted land, and the Draft EA relies on surveys completed of approximately 4,002 acres. Further, BLM improperly excluded issue areas—including safety, vegetation, wildlife and habitat, and soil resources—from its Draft EA based on the fiction that it need only analyze issues "that are truly significant to the action in question." The Project's effects on these excluded resources are both foreseeably significant and in need of further data collection.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Surveys were conducted at an appropriate scale and locations for potential resource impacts for each resource in accordance with BLM protocols. See POD Section 5 and related appendices for a complete description of surveys that were completed, associated protocols, and survey results.

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397	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	As noted in our initial comment, BLM improperly excluded issue areas from analysis based on the fiction that it need only analyze issues "that are truly significant to the action in question." There is no "truly significant" standard under NEPA; all "likely" direct, indirect, and/or cumulatively significant impacts must be analyzed. Rather than exclude significant issues, CEQ explained that "CEQ's intent is that agencies focus their NEPA documents on the issues that are key for the public to comment on and the agency to take into account in the decision-making process, and only briefly explain why other, unimportant issues are not discussed." We raised in our initial comment that BLM must not improperly segment environmental review, meaning BLM must analyze all Project activities. CEQ's 2024 NEPA revisions reiterate this critical principle, noting that "this longstanding principle from the 1978 regulations—that agencies should not improperly segment their actions—is relevant not only when agencies are preparing EISs, but also when agencies determine whether to prepare an EA or apply a [Categorical Exemption]." CEQ then enshrined the requirement to analyze the whole of a project in its 2024 regulations, directing agencies to "evaluate, in a single review, proposals or parts of proposals that are related closely enough to be, in effect, a single course of action." They further added that agencies "shall consider whether there are connected actions, which are closely related Federal activities or decisions that should be considered in the same NEPA review that (1) automatically trigger other actions that may require NEPA review; (2) Cannot or will not proceed unless other actions are taken . . . .; or (3) Are independent parts of a larger action and depend on the larger action for their justification." It is clear that all of the Snowy River Project activities—from the Rights of Way (ROWs) to the pipeline and injection wells themselves—are connected as one larger project and must be analyzed in one NEPA review. As we did in April 2024, we again urge BLM to disclose and analyze the totality of the Snowy River Carbon Sequestration Project's activities on the climate, air quality, community and wildlife safety, and more. This analysis must take place within an EIS. CEQ's 2024 revisions make clear that obfuscation of impacts is not allowed, stating that agencies must consider both short- and long-term harms, even if there are purported benefits along either time scale. To support this, CEQ made the word "effects" singular "to emphasize that this analysis is done on an effect-by-effect basis and does not allow agencies to weigh a beneficial effect of one kind against an adverse effect of another kind or evaluate whether an action is beneficial or adverse in net to determine significance." Relatedly, CEQ added language that "prohibits agencies from offsetting an action's adverse effects with other beneficial effects to determine significance."	The CEQ regulations in effect during preparation of the Draft EA (40 CFR Parts 1500–1508, rescinded April 11, 2025) state that issues may be identified through scoping, and that only those deemed significant should be the focus of the environmental analysis. This principle is reinforced by the U.S. Department of the Interior's NEPA procedures (516 DM 1, July 2025), which direct agencies to concentrate their analysis on potentially significant impacts and to provide a concise evaluation of those effects. In alignment with these requirements, the BLM updated Section 1.6 of the EA to clarify that the analysis was focused on issues determined to be significant to the proposed action and its alternatives. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). 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Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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398	Axelrod, Joshua; Natural Resources Defense Council	The Snowy River Project represents an entirely new use of federal public lands. Prior to this project application, the Bureau of Land Management (BLM) has never reviewed an application for development of a project that will utilize Underground Injection Control (UIC) Class VI wells for permanent storage of CO2. As a first-of-its-kind project, the BLM is also conducting this review with no regulations specific to the siting and management of this type of long-lived infrastructure and a resource management plan (RMP) that contains no management direction for the use of surface resources and underground pore space for permanent storage of CO2. Therefore, as a threshold matter, we urge the BLM to get the environmental review and permitting process right—by (1) promulgating appropriate ROW regulations for UIC Class VI wells, (2) completing a RMP amendment to allow for the type of use required by this project, and (3) completing an environmental impact statement (EIS)—before moving this project forward. In addition to these threshold matters, we urge the BLM to complete a full environmental impact statement (EIS) to ensure that the agency has adequately considered the reasonably foreseeable direct, indirect, and cumulative impacts that would accrue if this project were permitted and built as proposed. As discussed in more detail below, the Draft EA is missing significant discussion and analysis of a range of potential impacts to threatened and endangered species like the greater sage-grouse (GRSG), changing surface conditions over the lifespan of the project, geological risks and their effect on surface resources, and a cumulative greenhouse gas assessment that takes into account the foreseeable and ascertainable up- and downstream impacts of permitting this project. Under the National Environmental Policy Act (NEPA), the BLM must prepare an "environmental impact statement [where the] proposed agency action . . . has a reasonably foreseeable significant effect on the quality of the human environment." Though the NEPA implementing rules are undergoing revision now, both the rules in force today and the rules that will come into force in July support the need for an EIS here. Under the current rule, "[i]n considering whether the effects of the proposed action are significant, agencies shall analyze the potentially affected environment and degree of the effects of the action." This consideration requires analysis of the unique characteristics of the local area, the presence of things like critical habitat for threatened or endangered species, and a range of effects, including short- and long-term, and beneficial and adverse. In addition, and of particular importance in the case of the Snowy River Project, the BLM should have provided information and analysis relating to how the Project is an "interdependent part[] of a larger action and depend[s] on the larger action for [its] justification."	Development of policies and regulations is outside the scope of this EA. Denbury submitted an SF-299 application proposing ROWs (surface and pore space) in Carter County, Montana on BLM lands to sequester CO2 through an EPA UIC Class VI permit. Therefore, the BLM initiated NEPA with the purpose and need for the action to respond to the pending application requesting ROWs in Carter County, Montana for sequestering CO2 through an EPA UIC Class VI permit in accordance with the 2015 MCFO RMP, FLPMA ROW policies and regulations. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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399	Axelrod, Joshua; Natural Resources Defense Council	Under the newly finalized NEPA implementing rule, the significance of an agency action for the purposes of determining the level of environmental review requires the BLM to "examine both the context of the action and the intensity of the effect." Of note, the rule expands on the meaning of context and intensity by stating: In assessing context and intensity, agencies should consider the duration of the effect. Agencies may also consider the extent to which an effect is adverse at some points in time and beneficial in others (for example, in assessing the significance of a habitat restoration action's effect on a species, an agency may consider both any short-term harm to the species during implementation of the action and any benefit to the same species once the action is complete). However, agencies shall not offset an action's adverse effects with other beneficial effects to determine significance (for example, an agency may not offset an action's adverse effect on one species with its beneficial effect on another species). As discussed in Sections I.c, infra, the Snowy River Project is unique in "context" to other typically permitted uses of BLM-managed lands given the extensive surface area that will need monitoring, the length of the proposed drilling program, and the length of operation and postoperation monitoring. In addition, as discussed in Sections I.a, I.d, and I.e, infra, the Snowy River Project is also unique in its potential to create both beneficial and adverse effects at differing points of its operation—a reality that requires extensive analytical scrutiny that is missing in the BLM's Draft EA for this project. An understanding of the "reasonably foreseeable" upstream and downstream greenhouse gas effects of permitting this project is especially important, as the Draft EA appears to violate the Council on Environmental Quality's direction that agencies "not offset an action's adverse effects with other beneficial effects" in its consideration of the significance of a project's effects, especially its adverse effects.	The EA was completed in accordance with all current applicable laws, rules, regulations, and policies. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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400	Gleason, Carolyn; US EPA Region 8	On November 27, 2023, EPA provided scoping comments to BLM after completing its review of the September 8, 2023, Plan of Development for the Project. In those early scoping comments, EPA included recommendations for analysis of air and aquatic resources, and suggested methods for BLM to report on Project-related emissions of air pollutants, analyze greenhouse gas (GHG) emissions and emission storage activities, and disclose climate effects by using estimates of the social cost of GHGs. Taking into consideration those comments and reviewing the Project's Draft EA, EPA provides the following comments in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. § 7609. In addition to BLM's environmental review under NEPA of the Project Plan of Development (POD) and Right of Way (ROW) application, the 15 wells will also be subject to a Class VI well permitting process administered through EPA Region 8's Underground Injection Control (UIC) Program. While UIC Class VI permits include a robust set of requirements that are designed to protect underground sources of drinking water (USDW) for the life of the project, NEPA requires consideration and disclosure of the full range of potential environmental impacts to resources in the Project vicinity, including water resources. Applicable impacts for consideration in the EA include both the direct impacts associated with Denbury's ROW application and POD and the indirect impacts which may occur later in time or farther removed in distance. The analysis of reasonably foreseeable indirect effects which could be caused by the proposed action or alternatives being reviewed is required under NEPA and extends to a broader range of resource impacts in this case which were eliminated from further analysis in the Draft EA. Some of these subjects include impacts to water resources, seismicity, and public safety.	Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. BLM ROWs are required to be in compliance with federal, state, and local regulatory requirements. POD Section 2.4 lists all the federal, state, and local permits/approval Denbury would secure associated with the project. As noted in EA Section 4.2, the BLM has been in close coordination with State of Montana and EPA Region 8 staff regarding the BLM NEPA review process to ensure consideration of the State permitting and EPA UIC permit requirements and permit review process. In particular, EPA UIC Class VI permit reviews are site specific well reviews determined to be functionally equivalent to NEPA reviews and are thus exempt from NEPA review requirements, unless triggered by another statutory requirement (e.g., NHPA). Analysis of another agency's permitting action that has not been proposed/applied for yet (i.e., EPA UIC Class VI permit), and will be analyzed in detail by the permitting agency using current data, would be outside of BLM's jurisdiction. The BLM did, however, analyze the connected action of surface disturbance on State and private lands and associated emissions from drilling and operation of EPA UIC Class wells from issuing a BLM ROW. See EA Section 2.1 where tables include surface acres on State and private lands and Section 3.2.3 for air resources analysis. Denbury's proposal includes all spatial and temporal components which allows for a comprehensive environmental analysis of connected actions associated with issuance of the BLM ROWs, and avoids NEPA piecemealing analysis. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. As stated above, EPA would conduct site-specific reviews per well which would be equivalent to NEPA reviews.
401	Pam Castleberry; Carter County	Please consider this my public comment regarding the Snowy River CO2 Project. I am writing to request that BLM consider an EIS for the above mentioned project. I have attended four of the meetings regarding the proposed project, I have reviewed the DRAFT EA and discussed the issue with several concerned individuals living near the proposed site. This project proposal is huge for many residents of Carter County.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.

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402	Pam Castleberry; Carter County	Based up the presentations made by BLM and reviewing the Draft EA, I feel that BLM has fallen short in terms of project disclosure and evaluation of the impacts on climate, air quality, seismicity, water resources, cultural resources and protected species. I do not feel that BLM has come to the table with the Carter County Conservation District, Carter County Land Resource Committee, Carter County Weed Board, BLM permittees, C&B Grazing District, Fish Wildlife & Parks and the Department of State Lands. I think it is vital to meet with these groups to determine the impacts that this project may have. I believe that a project of this degree requires nothing short of an EIS. The comments made by Dan Dinstel and others during the Teams meeting May 15, 2024 with Director Germann should not be taken for granted. These individuals are very well researched and should be considered, there has been much time and effort by these folks to make the presentations. I am hopeful that you and your team members review such comments in your final consideration. We look forward to future meeting regarding this project, With regard to my comments, I'll urge BLM to take the road less traveled and require an EIS on the Snowy River CO2 Sequestration Project. Thank you in advance for your kind consideration.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Figure 3 in EA Appendix D shows the project sequence associated with BLM, EPA, and State of Montana. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. The BLM has had extensive outreach with local, state, federal, and tribal governments since receipt of the ROW application. BLM posted on its Facebook page initial information about the project on April 4, 2022, inviting the public to be involved in the environmental review process. Specific to Carter County, as stated in EA Section 4.2, the BLM engaged Carter County officials during the initial planning stages of the project on April 19, 2022; September 18, 2023; and April 30, May 15, and June 25, 2024. The latter two meetings were upon request of NPRC. See EA Section 4.2 for additional agency outreach. The BLM initiated the NEPA process as soon as practicable after receiving the application, and the proposal for action was determined sufficiently developed for agency consideration [40 CFR §1501.9(a)]. Based on the extended timeframe to complete baseline surveys, the application was deemed complete on September 8, 2023, after submittal of an updated POD for BLM to initiate the NEPA review process and public involvement. Meaningful public engagement was initiated as part of the NEPA process which included various opportunities of public engagement and notification. This included a 30-day scoping period that was extended to 60 days, and a 30-day comment period that was extended to 90 days. The BLM conducted a scoping meeting in Ekalaka on October 12, 2023. The BLM also conducted two public comment meetings on the EA, in-person in Ekalaka on March 5, 2024, and virtual on March 6, 2024. The open-house style of public meetings ensures members of the public get to interact one-on-one with subject matter experts in the areas in which they are specifically interested or have questions. In addition, the BLM provided Project materials (hardcopy and digital) to the public and to Carter County commissioners for review. For the public comment period meetings, the BLM included EPA Region 8 staff to further help address public questions on the UIC Permitting process and regulatory requirements. All materials for the Snowy River Project, including a detailed scoping report, are available on the BLM's e-Planning project site. As part of the NEPA process, the BLM sent notification letters to all federal, State, Tribal, and local governments, landowners, interested parties, and permit holders that may be interested or affected by the proposed action; providing notice through publication in various media (newspapers, social media). These opportunities to participate in the NEPA process for the Project support the identification of key environmental issues for detailed analysis, help screen out issues that do not warrant further review, and inform whether related actions should be evaluated within the same environmental document.

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403	Kahn, Elizabeth	Please do everything in your power to ensure this project has the most comprehensive environmental impact assessment. The people of Montana and surrounding areas deserve this as well as the upmost care when it comes to this project that is extremely risky as far as I can tell.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.
404	Ruderman, Drew	Need EIS!!	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.
405	Castleberry, Pam	I am writing to ask that BLM to choose an extensive EIS. Further research and review must be conducted before this project is allowed to be conducted.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. Surveys were conducted at an appropriate scale and locations for potential resource impacts for each resource in accordance with BLM protocols. See POD Section 5 and related appendices for a complete description of surveys that were completed, associated protocols, and survey results.

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406	Summers, Steve	Obviously I'm against this project and want it stopped. I also realize the current administration is pushing these projects and the BLM is in favor. With that in mind I'm requesting that an EIS is performed by an unbiased third party. There's too much at stake here to not do an EIS. Due diligence shouldn't be too much to ask.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS.
407	Trygstad, Ellen	The proposed Snow River Project is misdirected. Please do not approve this project which wastes resources. The funds and skills that go into all this design and construction should go instead to the source of the problem including reducing the processing of coal and other fossil fuels, reducing the need for these fuels, and reducing emissions on site. Energy companies need to establish alternative sustainably built, safe energy sources for communities. In turn, this transitions companies to sustainable futures, and retains work force.	Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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408	Deford, Stephen	Most of this was written by others, but I agree with it. I will add this: Carbon capture and storage is not based on good science. The Current Co2 saturation in the air we breath (0.04%) is not a high risk. However, if it gets reduced to 0.02% plants start to die, and people begin to starve. A better plan would be to plant more trees, and in crease crop production to reduce hunger around the world. We have an opportunity here that we are losing to bad science. Thank you for the opportunity to submit comments on the proposal to permanently store carbon dioxide in underground rock formations on public land in Carter County. I am writing to ask that BLM choose Alternative. 1 - No Action Alternative. Please deny the right of way permit application.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. Although vegetation and soils have the capacity to act as a natural sink for CO2, the scale at which the natural landscape can sequester carbon differs from the capacity of geologic sequestration. Table 10-1 of the BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends (2023) lists the average carbon sequestration capacity on a per acre basis that occurs on Federal lands for each state. These data are derived from the USGS's *Federal Lands Greenhouse Gas Emissions and Sequestration in the United States: Estimates for 2005-14* (2018) report on federal emissions and sinks. The average acre of federal land in Montana sequesters -0.69602 metric tons of carbon per year. EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. For the 46 acres of federal land that would be converted to gravel cover and new two-tracks during Project operation, the Project would result in a loss of capacity to naturally sequester approximately 32 metric tons of carbon per year. Over a 20-year injection period, this equates to 640 metric tons of carbon sequestration, which is significantly less than the 150 million metric tons of CO2 that the Project may sequester. At the end of the project's life, these 46 acres would be reclaimed and the lands' capacity to act as a natural carbon sink would be restored.
409	Water, Laughing	Climate change is a very serious problem, and it requires serious solutions. I've paid considerable attention to a wide range of solutions, and I am not at all convinced that carbon capture and storage is a practical, cost-effective alternative to efficiency, clean energy, protecting natural ecosystems (forests, grasslands, wetlands), rebuilding soil, and more. Quite simply, we must reduce carbon emissions, not only because of climate change, but public health as well. Globally it's estimated that 20 percent of deaths are caused by the pollution from burning fossil fuels. Please direct our limited resources elsewhere.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. Under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells. The EPA conducts detailed analysis and characterization of projects in accordance 40 CFR Part 146 Subpart H, as part of the EPA UIC Class VI permit review to determine compliance with the performance standards for well construction, operation and maintenance, monitoring and testing, reporting and recordkeeping, site closure, financial responsibility, emergency response, plugging, and post-injection site care. See POD Appendix A for additional details. Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.

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410	Hanson, Art	However, you MUST do MUCH MORE. We MUST keep ALL Climate-Changing fossil fuels IN THE GROUND! We MUST achieve 100% Clean, Renewable Energy like Solar and Wind in electrical generation and transportation by 2030.	Consideration of an alternative that proposes alternative methods of sequestering CO2 (i.e., other than sequestering CO2 via an EPA UIC Class VI permit) would be outside the scope of this EA and would not meet the purpose and need. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3.
Paleontological Resources			
411	Carroll, Llane; Harmon Creek Cattle LLC	According to Appendix T of the POD, there is a high likelihood of encountering fossils during the construction phase. Construction of access roads will provide increased traffic leading to the potential for fossil poaching.	Denbury conducted a paleontological survey for the Project within an approximately 300-foot-wide study corridor along the proposed ROWs for surface elements. A UDP for Paleontological Resources has been prepared to help prepare everyone involved with the Project to know what to look for and what to do if something of potential scientific interest is discovered. A BLM-approved paleontologist would monitor all surface disturbing construction activities. Denbury has also committed to coordinate with the Carter County Museum prior to initiating construction of each construction group. EA Section 1.7.1 discloses that the Project would primarily use existing roads to access the site. Approximately 25 miles of existing developed roads (Lone Tree Road, Ridge Road, and Hammond Road) and 27 miles of existing two-tracks would be used. Fourteen miles of the existing developed roads and 25 miles of existing two-tracks are on BLM-administered lands. Approximately five miles of new access roads (four miles on BLM-administered lands) would be created for the Project. Three miles would be spurs off existing roads that end at wells or pump stations, and two miles would extend along the existing CCA pipeline corridor. Except for a 0.25-mile road that would be graded and graveled for access to the Pump Station North, each new road would be maintained as a two-track.
Sediment and Soil			
412	Mccutchan Royer, Shantel	Erosion of pipelines is another concern of mine. Also, from experience, we can't even cross livestock over the erosion at our ranch. And again, complaining and asking them to fix it has not done any good.	The Reclamation, Mitigation, and Monitoring Plan (POD Appendix G) includes procedures to control erosion and reduce the potential for sediment to be transported offsite or into wetlands or streams. The Plan meets 2015 MCFO RMP requirements to reduce water/wind erosion and re-establish site stability, and it includes notification requirements to the BLM Authorized Officer prior to and during reclamation efforts to ensure they meet BLM standards. The POD includes Project monitoring and oversight by a third-party environmental compliance inspector to ensure POD construction and reclamation measures are completed for the Project. Seed mixes are based on BLM grouped ecological site descriptions.
413	Millbrooke, Anne	Pipeline construction alone, according to the Plan of Development, will involve clearing, topsoil stripping, grading, trenching, stringing, bending, welding, padding, backfilling, rough grading.	The Reclamation, Mitigation, and Monitoring Plan in POD Appendix G outlines procedures for re-establishing native vegetation to provide site stability for surface disturbing activities within the ROW areas during construction, reclamation, and post-reclamation activities. The plan includes site-specific BLM-recommended seed mixes, monitoring requirements, and reporting to the BLM during reclamation efforts to ensure BLM standards are met and that disturbances, including but not limited to areas used for grazing and wildlife habitat, are promptly reclaimed. A third-party environmental inspector would be employed to provide oversight, monitor, and report on compliance with the ROW stipulations, permit conditions, and procedures and commitments outlined in the POD and associated appendices during construction and reclamation activities.
Socioeconomics			
414	International Union of Operating Engineers Local 400	The Local 400 IUOE would like to comment in support of the project as an exciting emerging technology and opportunity for job creation. Thanks to the Bureau of land Management for the excellent work with regards to the project.	EA Section 3.4.3 includes the estimated workforce requirements for each construction group and operational phase of the Project. Denbury anticipates that approximately 25% of the workers hired for construction would come from Carter and/or Fallon County. This section also notes that the Project would provide economic contributions to Carter and Fallon counties and surrounding communities through increased expenditures on local goods and services during construction periods.

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415	Mccutchan Royer, Shantel	Southeast electric said they would have to make a new substation, who pays for the substation? Will it affect existing customer rates and power availability?	EA Section 2.1.2 describes the upgrade and extension of an existing Southeastern Electric Cooperative electric transmission line and construction of a new transmission line to service the proposed pump stations. The EA included the power line corridor for analysis purposes. The proposed action does not proposed ROWs for the power lines or associated facilities; Southeastern Electric Cooperative would be required to submit separate ROW applications for BLM administered lands. BLM would complete a separate NEPA review for any subsequent ROWs. Denbury would fund review of the application and construction of the powerline.
416	Individual	Under socioeconomic conditions, the presentation stated that Carter County had medium to high rental vacancy rates. This statement is not based in fact. During the past three years, there have been several newly hired teachers that turned back their contracts because they were unable to find any housing in Ekalaka. This situation prompted the school to propose a school bond to build housing for teachers. There is simply no extra housing available in Ekalaka or nearby.	In EA Section 3.4.1, Table 3-12 shows that the 2021 rental vacancy rate in Carter County was 2.5% and in Fallon County was 16.5 percent. The rental vacancy data were obtained from U.S. Census Bureau data. As noted in EA Section 3.4.1, Fallon County was included in the analysis because it is anticipated to provide most of the workers and housing needed during Project construction and operations. EA Section 3.4.3 states that more temporary and rental housing may be available in Fallon County than in Carter County. EA Section 3.4.3 was revised to clarify the anticipated workforce and housing requirements. If qualified workers are unavailable in Carter and Fallon counties, Denbury would hire additional workers from outside of the counties. Temporary non-resident workers are anticipated to occupy local hotels, motels, and RV camps in Ekalaka and Baker, and temporary housing needs would be discontinuous due to the limited construction timeframe of July 16 - November 30 in any given year during the phased Project development over a 20-year period. Housing for permanent workers may include rental housing or home ownership.
417	Individual	Though they list 25% local hire in early stages of this project, I'm not sure where these employees will come from. In February of 2024, the unemployment rate in Carter County was 2.6% with 666 people employed. Using these figures, that means that only 17 people in Carter County are unemployed. Nearby counties have similar unemployment numbers (Fallon-1.6% and Powder River-2.6%). This project seems a very risky choice for a small number of jobs and a small decrease in already low unemployment numbers.	As disclosed in EA Section 3.4.3, Denbury has indicated that they typically are able to hire 8 short-term, temporary construction jobs from the local population for each of the construction groups. The commenter is correct that unemployment is low in the local counties, but unemployment statistics are a snapshot of folks actively seeking employment. Construction is projected to begin in 2026 and be phased over a 20 year timeframe where economic conditions may change. Positions may be filled locally if labor is available. A primary economic contribution would be through the increased expenditures on local goods and services during the construction period.
418	Millbrooke, Anne	Profits, and likely many of the temporary and the few permanent jobs, would go to an out-of state company.	EA Section 3.4.3 includes the estimated workforce requirements for each construction group and operational phase of the Project. Denbury anticipates that approximately 25% of the workers hired for construction would come from Carter and/or Fallon County. This section also notes that the Project would provide economic contributions to Carter and Fallon counties and surrounding communities through increased expenditures on local goods and services during construction periods.
419	Carroll, Sharon	Details regarding a fund established to mitigate impacts. Such a fund will allow Carter County and its impacted residents- all residents of a rural, underserved community- to address costs which will result from the development and will not be restricted to roadway impacts. The EA claims a number of economic contributions from the Project among them increases in sales taxes (p.51). Montana has no sales tax. Other claims of economic advantages seem equally suspect. In fact, given the report in their own EA p.46, "the impacts of the Project on population and employment would be temporary and minor" (p.50).	In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. EA Section 3.4.3 has been revised to remove reference to state sales and use tax revenues.

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420	Carroll, Llane; Harmon Creek Cattle LLC	The EA discussion is limited to two alternatives. Alternative 1 is a no action alternative. Alternative 2 is to approve a requested SF-299 application from Denbury. In reviewing the EA, the support for alternative two relies on a number of embedded biases designed to improve the analysis in favor of alternative two. Page 51 paragraph 3 suggests that the economic conditions of Fallon and Carter County will be improved as a result of increases in sales taxes as a result of economic activity during the construction phase. Montana does not have a sales tax so there would not be any additional local revenue. Fallon and Carter County are already at near full employment, according to table 3-12 unemployment is less than 2.0%. It is highly unlikely the POD will be able to obtain local labor. If local labor is not obtained the incoming labor supply will place a heavy demand on an already short available housing supply. Previous pipeline projects in Carter County required housing to be obtained in Miles City and Glendive as well as Belle Fourche, South Dakota. Carter County is a Justice 40 county and placing strain on already limited housing defies the intent of revitalizing the local economy.	EA Section 3.4.3 was revised to clarify the anticipated workforce and housing requirements. If qualified workers are unavailable in Carter and Fallon counties, Denbury would hire additional workers from outside of the counties. Temporary non-resident workers are anticipated to occupy local hotels, motels, and RV camps in Ekalaka and Baker, and temporary housing needs would be discontinuous due to the limited construction timeframe of July 16 - November 30 in any given year during the phased Project development over a 20-year period. Housing for permanent workers may include rental housing or home ownership. EA Section 3.4.3 has been revised to remove reference to state sales and use tax revenues. An environmental justice analysis is not required for the Project due to recent changes in federal policy. Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and the accompanying Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), direct federal agencies to strictly follow the NEPA as written in statute. These directives also repeal previous Executive Orders 12898 and 14096, which had required consideration of environmental justice in federal decision-making. Because those prior Executive Orders have been repealed, the BLM is not obligated to conduct an environmental justice evaluation to make a reasoned decision under NEPA. The Justice40 Initiative, established under Executive Order 14008 in 2021, was part of a broader effort to address environmental justice and equity in federal policy and funding decisions. Executive Order 14008 was rescinded on Jan. 20, 2025. Further, the Project is not a federal investment project, nor is it federally funded; therefore, Justice 40 was not applicable when the initiative was in effect.
421	Barbour, Drew	As a rancher, it is my duty to protect these lands and I stand against the Snowy River Sequestration Project proposed by Debury. The proposal will be detrimental to my community and my business. Our ranch will be included within the project boundary and will affect our business in the following ways: 1) Cultural- We enroll in block management with FWP. It is a financial resource that contributes to our business. This proposal, no matter the proposed times present or time of year, will run wildlife out of the country. We know this because in just the few short weeks of hunting pressure here animals begin leaving within the first day and Yes, we do regulate the number of hunters per day as well. If wildlife leave and stay gone for the next 20 years, hunters will not return to contribute to that enrollment or the housing we provide that helps to sustain our business. Contrary to the EA, this project will not be beneficial to our community. The proposed workers, according to the EA, facilitate 3-9 workers per action (drilling, roads, well pads, etc..). These people will be employed prior to the project and will only raise rent in the community of Ekalaka. Ekalaka is a Justice 40 community and "President Biden and Vice President Harris are committed to ensuring that the voices, perspectives, and lived realities of communities with environmental justice concerns are heard in the White House and reflected in Federal policies, investments, and decisions." Here is my voice- I want and EIS, at the very least.	As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse) and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Section 3.5 of the EA analyzed impacts to sage-grouse and associated habitats. Denbury has committed to complete all construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to mitigate disturbance to grouse, migratory birds, raptors, and winter big game areas. In addition to restricting construction, drilling, routine maintenance, and reclamation activities, pipeline and injection well operations would be remotely monitored, and operational vehicle traffic for monitoring is expected be up to one vehicle visit per well per day, or less, depending on weather and operation conditions. EA Section 3.5.3 describes additional stipulations that BLM would require if the ROW grants are approved. These include restrictions of motorized vehicle use for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). EA Section 3.4.3 was revised to clarify the anticipated workforce and housing requirements. If qualified workers are unavailable in Carter and Fallon counties, Denbury would hire additional workers from outside of the counties. Temporary non-resident workers are anticipated to occupy local hotels, motels, and RV camps in Ekalaka and Baker, and temporary housing needs would be discontinuous due to the limited construction timeframe of July 16 - November 30 in any given year during the phased Project development over a 20-year period. Housing for permanent workers may include rental housing or home ownership. An environmental justice analysis is not required for the Project due to recent changes in federal policy. Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and the accompanying Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), direct federal agencies to strictly follow the NEPA as written in statute. These directives also repeal previous Executive Orders 12898 and 14096, which had required consideration of environmental justice in federal decision-making. Because those prior Executive Orders have been repealed, the BLM is not obligated to conduct an environmental justice evaluation to make a reasoned decision under NEPA. The Justice40 Initiative, established under Executive Order 14008 in 2021, was part of a broader effort to address environmental justice and equity in federal policy and funding decisions. Executive Order 14008 was rescinded on Jan. 20, 2025. Further, the Project is not a federal investment project, nor is it federally funded; therefore, Justice 40 was not applicable when the initiative was in effect.

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422	McCutchan, Shelly	This project would waste taxpayer dollars while only benefiting Denbury's financial interests.	The Project would not be federally funded. In accordance with 43 CFR §2804.14(a), a project proponent must reimburse the BLM for the reasonable costs of processing the ROW application. In January 2022, Denbury established a cost recovery account with the BLM to pay for all expenses associated with review of the Project. In addition, the ROW Holder is also responsible for paying for the monitoring fees associated with ROW grants. Additionally, the Project is not a carbon capture project, so it does not meet the Section 45Q CCUS tax incentives codified in 26 U.S.C.§45Q. Denbury would not receive tax credits for the Project.
423	Individual	We realize that there would be the benefit of some jobs, but not that many. Are there people in Carter county who are qualified to have those jobs? Will allowing this make the inflation and housing problems of this rural area worse?	EA Section 3.4.3 was revised to clarify the anticipated workforce and housing requirements. If qualified workers are unavailable in Carter and Fallon counties, Denbury would hire additional workers from outside of the counties. Temporary non-resident workers are anticipated to occupy local hotels, motels, and RV camps in Ekalaka and Baker, and temporary housing needs would be discontinuous due to the limited construction timeframe of July 16 - November 30 in any given year during the phased Project development over a 20-year period. Housing for permanent workers may include rental housing or home ownership. An assessment of inflation within Carter and Fallon counties is outside the scope of this analysis.
424	Individual	With any plan you must do a cost benefit analysis. The benefits of violating Carter County are not worth the cost that CO2 sequestration will be for the residents and the flora and fauna of the prairie.	The BLM initiated NEPA to respond to the pending application requesting ROWs in Carter County, Montana for sequestering CO2 through an EPA UIC Class VI permit in accordance with the 2015 MCFO RMP, FLPMA ROW policies and regulations. NEPA does not require the weighing of costs and benefits of each alternative. The EA discloses the potential impacts for each alternative.
425	O'Grady, Morgan; Western Environmental Law Center et al.	BLM must consider the uncertainty of the Project's long-term economic viability, which will be impacted by expected declines in shale gas production, the remaining economic life of the upstream gas processing facilities, and dependence on federal tax credits, which will expire. Specifically, the Project seeks to leverage 45Q tax credits, which yield $85 per ton of geologically sequestered CO2, to extend the lives of the Shute Creek and Lost Cabin gas processing facilities. When coupled with another planned carbon sequestration project that would also source CO2 from Shute Creek, a total of 200MT of CO2 storage is implicated—worth $17 billion dollars in total potential tax credits—that would flow towards Shute Creek's operator, ExxonMobil. Despite this large sum, ExxonMobil publicly reports that even greater subsidies are needed. Moreover, 45Q tax credits are only available for 12 years of a facility's operation. BLM must consider whether the Project is viable after expiration of the credits, how ExxonMobil would finance the Project for the remaining projected eight years of operation, and if these federal subsidies are sufficient to support the Project through a transition away from oil and gas, which was the underlying purpose for the credits. Ultimately, BLM must take a hard look at the foreseeable life of the Project to avoid both stranded assets and the need to decommission the CO2 pipeline.	Evaluating the merits or deficiencies of CCUS tax incentives codified in 26 U.S.C.§45Q is under the jurisdiction of the Internal Revenue Service and not in the BLM's purview or the scope of the analysis. Because this Project does not meet Section 45Q requirements (i.e. it is not a carbon capture project), Denbury would not receive tax credits for the Project. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The EA analyzes two alternatives, no action alternative and proposed action alternative. The spatial and temporal environmental effects, including cumulative, of the alternatives are considered for the resource issues (air resources/greenhouse gas emissions, cultural, socioeconomics, sage-grouse, and water quality and related public health) identified for detailed analysis in EA Section 3. In accordance with 43 CFR §2805.20, all BLM ROWs must be properly bonded as required by Denbury would secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)].
426	O'Grady, Morgan; Western Environmental Law Center et al.	BLM has also failed to analyze the Energy Return on Investment (EROI) for the Project. For the Project—and the upstream CO2 sources on which it relies—to be economically viable, the energy in the fuels produced must exceed the energy required to produce those fuels. The amount of energy required to capture, pressurize, transport, and inject CO2, in addition to any other energy requirements over the lifetime of the Project, should be weighed against the amount of energy produced as a result of processing gas at the sourcing facilities. BLM must analyze how expending significant amounts of energy capturing and sequestering CO2 at these facilities compares to thoughtfully decommissioning these facilities and replacing them with more efficient, EROI-positive energy projects. This analysis should address both the emissions and the economics of the Project.	Analysis to determine the energy return on investment (EROI) is out of scope of this EA. As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. The ROWs are not proposed for generating a source of power. In addition, conducting empirical research for Carbon, Capture, Utilization and Sequestration processes is not required by NEPA.
427	Lingle, Drew	Denbury estimates 25 percent of the employment for construction of the project would be hired locally. No homes or businesses would be displaced by the project and 7 permanent jobs would be created. Because of the project's location in a low-income environmental justice community with an estimated 892 jobs, increased socioeconomic opportunity resulting from both temporary construction jobs and permanent jobs would allow diversification in the local economy.	The EA considers both the no action alternative (Alternative 1) and the proposed action (Alternative 2). The socioeconomic effects of both alternatives are included in EA Section 3.4.
Vegetation and Special Status Plants			

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428	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Just like with other excluded issues, BLM erred by excluding vegetation and soil from the Draft EA. As we establish in this comment letter, there are numerous Project impacts that will disrupt these features (such as ground disturbance); there are also likely impacts (such as from CO2 leaks) that could cause harm. Instead, BLM punts on these issues because, for example, Denbury "would implement a Reclamation, Mitigation, and Monitoring Plan." These applicant-proposed measures are unenforceable, unsupported by evidence, and still leave significant impacts. BLM's dismissal of vegetation and soil impacts falls short of BLM's duties under NEPA.	EA Sections 1.7.3 and 1.7.5 address vegetation and soil impacts, which are anticipated to be short-term due to phased development and prompt reclamation practices. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Therefore, the BLM does not anticipate that short or long-term disturbances would result in changes to land health standards or other vegetation resource objectives, and thus would not be affected to a degree that detailed analyses is warranted. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. The POD committed measures and design features are enforceable by the BLM. Section 7 of the BLM ROW SF-299 application requires a project description, which may be submitted in a POD. As part of the ROW grant, if issued, stipulate that the ROW is subject to the terms and conditions in 43 CFR 2800, the terms and conditions/stipulations, design features and/or mitigations set forth in the application, POD, and the grant. Furthermore, EA Section 1.5 states that the ROW grant would be subject to terms and conditions in CFR 2800, the terms and conditions and stipulations specified, and mitigations set forth in the application and POD. Therefore, all applicant committed measures and design features in the POD are enforceable by BLM through the ROW grant.
429	G., Lacey	Vegetation was identified as an "Issue Identified but Eliminated from Further Analysis". Has the Project conducted species specific surveys for threatened, endangered and sensitive plant species? Has survey been conducted for rare or BLM-listed sensitive plant species? If not, those surveys should be conducted during appropriate flowering times for each sensitive species to confirm absence from the project disturbance footprint.	There are two Special Status Species plants, Nuttall Desert-parsley (*Platanthera dilatata*) and Visher's Buckwheat (*Eriogonum visheri*) in the MCFO (BLM IM-2020-012). Based on MT Natural Heritage Program dataset, the Nuttall Desert-parsley has been observed in Big Horn County and Visher's Buckwheat has been observed in the northern part of Carter and Powder River Counties, outside of the Project area. Based on BLM data from upland range monitoring, Standards and Guides, and the interdisciplinary team field visit on May 18, 2022, neither plant has been observed in the Project area. Therefore, the BLM did not see a need to conduct field surveys in the Project area.

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430	Catherin-Sauer, Augusta; Northern Plains Resource Council	BLM erred by excluding vegetation and soil from the Draft EA. As we establish in this comment letter, there are numerous Project impacts that will disrupt these features (such as ground disturbance); there are also likely impacts (such as from CO2 leaks) that could cause harm. Instead, BLM punts on these issues because, for example, Denbury "would implement a Reclamation, Mitigation, and Monitoring Plan. These applicant-proposed measures are unenforceable, unsupported by evidence, and still leave significant impacts.	EA Sections 1.7.3 and 1.7.5 address vegetation and soil impacts, which are anticipated to be short-term due to phased development and prompt reclamation practices. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Therefore, the BLM does not anticipate that short or long-term disturbances would result in changes to land health standards or other vegetation resource objectives, and thus would not be affected to a degree that detailed analyses is warranted. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. The POD committed measures and design features are enforceable by the BLM. Section 7 of the BLM ROW SF-299 application requires a project description, which may be submitted in a POD. As part of the ROW grant, if issued, stipulate that the ROW is subject to the terms and conditions in 43 CFR 2800, the terms and conditions/stipulations, design features and/or mitigations set forth in the application, POD, and the grant. Furthermore, EA Section 1.5 states that the ROW grant would be subject to terms and conditions in CFR 2800, the terms and conditions and stipulations specified, and mitigations set forth in the application and POD. Therefore, all applicant committed measures and design features in the POD are enforceable by BLM through the ROW grant.
Wastes, Hazardous or Solid			
431	Millbrooke, Anne	The proposal designates Montana as a waste disposal site for pollution, including pollution generated out of state. In fact, there is no limit or restrictions on the sources and amounts of inbound pollution.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. As part of the EPA's UIC Class VI permitting process, Denbury would be required to provide the EPA with an analysis of the chemical and physical characteristics of the carbon dioxide stream that is proposed for injection before a permit is issued. Denbury would analyze the CO2 stream regularly in accordance with an approved T&M Plan, and any changes to the physical, chemical, and other relevant characteristics of the carbon dioxide stream from the proposed operating data would be reported to the EPA in semi-annual reports. Additional information about injection well permitting requirements are provided in in POD Appendix A.

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432	Millbrooke, Anne	Is there "hazardous waste" exception for the captured CO2? (Again, I hope not as the entire project is based on the premise that CO2 is hazardous, otherwise why capture and store it.)	40 CFR §261.4(i) states that CO2 streams captured and transported for purposes of injection into an underground injection well are not a hazardous waste, provided certain conditions are met. The CO2 stream must be transported in compliance with USDOT requirements, injection of the CO2 must be in compliance with Class VI UIC well requirements, and no hazardous wastes can be mixed with or otherwise co-injected with the CO2 stream. Both the CO2 generator and the Class VI UIC well owner and operator must certify that the CO2 stream meets these conditions.
433	Millbrooke, Anne	Will BLM hold enough bonding money per injection well to cover the costs of cleanup? Does Exxon have any liability for its Denbury subsidiary's proposed project in Montana?	Denbury, as the applicant/ROW holder, would be required to secure and maintain a performance and reclamation bond until restoration of disturbed areas and other requirements relative to the construction phase of the Project have been accepted by the BLM Authorized Officer. Additionally, under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)].
Water Resources			
434	Ogdin, Dustin; Northern Plains Resource Council	The project poses short-term and long-term threats to water quality and quantity which the local community relies on. CCS can increase the water requirements of a power plant by a significant percentage. At a time when much of Montana is (and will continue to be) subject to extended drought conditions, devoting water to CCS is risky.	The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that will be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency. See POD Section 4.2.13. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
435	Abbot, Greg	There was discussion in last night's meeting about testing the isotopic provenance of contaminated water, does that mean if water quality or amount of adjacent users changes during the course of this project (but does not isotopically relate to the injection sites) that Denbury will be deemed not responsible?	The EPA requires "baseline geochemical data on subsurface formations, including all USDWs in the area of review" for Class VI UIC wells [40 CFR §146.82(a)(6)]. As described in POD Section 5.5, Denbury conducted sampling and analysis of groundwater and surface water samples in 2022 and 2023 as part of its baseline characterization program. The baseline geochemical data collected at and near the Project to date includes Delta Carbon-13 ($\delta^{13}C$) stable isotope analysis of surface water and groundwater samples, which was determined to be an effective metric for distinguishing different sources of water (POD Appendix S, Section 5.6). Potential fluid leakage (e.g., CO2, formation fluid) to USDWs would be routinely monitored during the life of the Project in accordance with an EPA-approved T&M Plan and MRV Plan as discussed in POD Appendix A. Routine monitoring would include evaluation of elevated concentrations of indicator parameters in surface water, soil, gas, and ambient air samples. Anomalies in the sampling result or during the Post-Injection Site Care period could result in additional sampling to investigate potential leakage. If fluid leakage to USDWs or the surface were to occur, Denbury would follow the emergency procedures outlined in its Emergency Response Plan (POD Appendix W, Section 6.4.5). All testing and monitoring results, including the chemical and isotopic analysis of groundwater samples, would be considered during fluid leakage evaluations and USDW non-endangerment demonstrations that would be required as part of the EPA's Class VI UIC well permitting process. As such, the isotopic characteristics of groundwater would not absolve Denbury of responsibility for water quality or quantity changes absent other supporting evidence. Under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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436	Bradley, Catherine	I write concerning the proposed Snowy River Carbon Dioxide Sequestration Project in Carter County. Having lived and worked in Carter County for the past 30 years has been an education. The Ranch where I live and work has, so far, had 2 pipelines constructed through it along with nearby pump stations and power lines to support it. This has left an annual corridor of weeds and areas of subsidence 7 years later. But beyond hundreds of miles of pipeline, this sequestration in the form of underground injection, with unknown consequences to the water table our county and rivers rely on, strikes me as thoroughly unacceptable. The risk to water quality above and below ground would be immense. The amounts of water consumed by this process would be immense. We are a semi-arid High Desert in Carter County, regularly in a state of drought. Simply because Carter County is a remote, sparsely populated piece of Montana is no excuse to reserve it, or sell it, as a dumping ground. As a multiple-use agency, I fail to understand how the BLM includes dumping toxic waste in the mission statement. As a part owner of these public lands, a resident of Carter County and a person relying on logic, I strongly oppose this project. Carter County, Montana, indeed the world would be better and more suitable served with solar arrays in this area. We have far more sun than water. Thank you for considering my comments concerning this project. It requires far more thought and input than mine, but again, this plan should not happen on our public lands.	Denbury has prepared a comprehensive Noxious Weed Management Plan (POD Appendix J) that meets the 2015 MCFO RMP objectives to prevent the expansion or eliminate the occurrence of invasive, non-native, or noxious weed species within the proposed ROWs. Moreover, in 2022, Denbury obtained a BLM Pesticide Use Permit and initiated the monitoring and treatment of noxious weed populations within and additional BLM lands surrounding the proposed ROWs. Denbury would continue annual monitoring and treatment of noxious weeds prior to Project construction and throughout the life of the Project. In addition, a third-party environmental inspector would be employed to provide oversight, monitor, and report on compliance with the ROW stipulations, permit conditions, and procedures and commitments outlined in the POD and associated appendices during construction and reclamation activities. These commitments are discussed in the POD Section 5.10 and EA Section 1.7.3. The Project is subject to federal, state, and local regulatory requirements, which include Montana DNRC water use/discharge permits. Specific to protection of drinking water, the ROWs are contingent on approval of the EPA UIC Class VI permit, the authorizing agency under the SDWA. See POD Section 2.4 for a complete list of permits and approvals that will be required for the Project. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
437	LaBree, Anna and Jesse	We do not feel the Snowy River CO2 Sequestration project would be good for Carter County. Just because Carter County is not a heavily populated area, we don't think it should be used as a dumping ground for carbon dioxide. Rural residents are dependent on water wells and we are concerned this could leak into the ground water. We see no good coming from this project for Carter County.	As described in POD Section 2.1, the Project location and subsurface pore space formation were selected for the following reasons: proximity to existing pipelines and CO2 sources, reduced number of affected landowners, low mineral development potential in the Project area, suitable reservoir porosity, capacity, and seal continuity, and low risk of seismic activity. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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438	Mccutchan Royer, Shantel	Who's responsible if water is contaminated? I was told at the Ekalaka (by Wendy i believe her name was)meeting that co2 is not harmful if it gets into the groundwater that it will just "bubble"? What tests have been done to prove this, and to what scale was it tested? As in co2 to water ratio? I know Rusty said it would be Denbury's responsibility but I don't think that's a detailed enough answer. In a study published in Environmental Science & Technology, authors Mark Little and Robert B. Jackson studied samples of sand and rock taken from four freshwater aquifers located around the country that overlie potential carbon capture and sequestration (CCS) sites. The scientists found that tiny amounts of CO2 drove up levels of metals, including manganese, cobalt, nickel, and iron in the water tenfold or more in some places. Some of these metals moved into the water quickly, within one week or two. They also observed potentially dangerous uranium and barium steadily moving into the water over the entire year-long experiment.	Under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
439	Individual	I am opposed to the proposed Snowy River Carbon Sequestration Project. I am concerned about the safety of the project in the area of water, both quantity and quality of available water. Many of us who live in Carter County depend on agriculture for our livelihood. We have frequent drought conditions leaving us to rely on ground water for both livestock and human consumption. If the CO2 escapes from the designated formation, it could disrupt the water on my ranch, as well as the water sources for the municipalities of Spearfish (SD), Rapid City (SD), Belle Fourche (SD), Gillette (WY) and Sheridan (WY). I'm sure there are other municipalities that also get their water from the Madison Formation. It is one thing to ignore residents on far-flung ranches, but if city populations are left high and dry, there is simply not enough water available to replace that currently being used.	The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency. See POD Section 4.2.13. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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440	Millbrooke, Anne	Danger of polluting ground water is real despite water quality regulations; Montana is famous for fines being cheaper than compliance as the Big Sky resort has illustrated repeatedly. And remote sensing of pipelines and wells have failed repeatedly to catch leaks promptly. The proposed site is an arid corner of Montana. The time is now, and now is a period of ongoing aridification. Water is very valuable to the land, wildlife, and residents of that area! The current trend is "progressively lower river flows, drier landscapes, higher forest mortality, and more severe and widespread wildfires—not year on year, but instead a clear longer-term trend toward greater aridification," according to Jonathan T. Overpeck and Bradley Udall, "Climate Change and the Aridification of North America," Proceedings of the National Academy of Science, 117/22 (2020), 11856–11858, https://www.pnas.org/content/117/22/11856/. In January 2024 the journal Science Advances published an article on the "increasing prevalence of hot drought across western North America since the 16th century." The eight authors referred to the increasing "frequency and intensity of concurrent heat and drought events" and "winter precipitation deficits." The source is: Karen E. King, Edward R. Cook, Kevin J. Anchukaitis, Benjamin I. Cook, Jason E. Smerdon, Richard Seager, Grant L. Harley, and Benjomin Spei, "Increasing Prevalence of Hot Drought Across Western North America Since the 16th Century." Science Advances, 10 (January 2024), eadj4389, https://www.science.org/doi/10.1126/sciadv.adj4289	The Project is subject to federal, state, and local regulatory requirements, which include Montana DNRC water use/discharge permits. Specific to protection of drinking water, the ROWs are contingent on approval of the EPA UIC Class VI permit, the authorizing agency under the SDWA. See POD Section 2.4 for a complete list of permits and approvals that will be required for the Project. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
441	Millbrooke, Anne	With the ongoing aridification of the western United States, including Montana, diverting valuable water to this project is not appropriate! The impact of such diversion would affect the water quantity and quality available for use by wildlife, native flora, agricultural lands, and the people.	The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency. As discussed in Sections 4.1.7 and 4.2.13 of the POD, the Project would require water for dust suppression and hydrostatic testing, and Denbury would procure water from off-site sources in Baker, Ekalaka, and/or Broadus. EA Section 2.1.1 has been revised to include water source information. Water would be transported to the site using water trucks. Water would be reused to the extent possible between pipeline hydrostatic test sections.
442	Individual	Groundwater contamination is another serious threat.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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443	Individual	These comments address the Denbury Snowy River CCS project. My first concern is that any possible stress on Montana's water resources is unacceptable. I don't think it has been thoroughly shown that CCS in general, and this project in particular poses no risk of either an increase in water consumption, or the likelihood of degradation of groundwater quality or availability. This is crucial for people who absolutely depend on those resources. And projections are that with continued climate warming those resources will become much harder to come by.	The Project is subject to federal, state, and local regulatory requirements, which include Montana DNRC water use/discharge permits. Specific to protection of drinking water, the ROWs are contingent on approval of the EPA UIC Class VI permit, the authorizing agency under the SDWA. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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444	Not Provided	Compromising our families and livelihoods is a risk we are unwilling to take without further research and an EIS. There needs to be further extensive research done to be certain that our water- the only resource that allows life to exist on these prairies- will remain pure and free from human impact.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. The Project is subject to federal, state, and local regulatory requirements, which include Montana DNRC water use/discharge permits. Specific to protection of drinking water, the ROWs are contingent on approval of the EPA UIC Class VI permit, the authorizing agency under the SDWA. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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445	Barbour, Liz; J Bar L Ranches	Although the threatened species are important to mention here- all species, including humans, will be threatened if our water sources become poisoned by leaching or leaking liquid CO2 into our ground water and run off reservoirs that host as a source of water to our cattle and wildlife. This project proposes to drill through good ground water aquifers in order to dump liquid carbon into "geological formations" up to over 8000 feet deep. As drought continues to increase in occurrence and water levels continue to decrease we will be faced to drill deeper and deeper wells. If there is leaking that occurs will the runoff poison reservoirs? Could this project present, longterm and unforeseen consequences to our children and grandchildren who will be stewarding this land in the future? This sort of sequestration at this magnitude is extremely understudied at length, long term. Compromising our families is a risk we are unwilling to take. There needs to be an EIS to be certain that our water- the only resource that allows life to exist on these prairies- will remain pure and free from human impact.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. The Project is subject to federal, state, and local regulatory requirements, which include Montana DNRC water use/discharge permits. Specific to protection of drinking water, the ROWs are contingent on approval of the EPA UIC Class VI permit, the authorizing agency under the SDWA. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
446	Individual	I am a resident of Butte County SD and am against this project using water from Butte County and I am against CO2 pipelines in general.	As discussed in Sections 4.1.7 and 4.2.13 of the POD, the Project would require water for dust suppression and hydrostatic testing, and Denbury would procure water from off-site sources in Baker, Ekalaka, and/or Broadus, none of which are in Butte County, South Dakota. EA Section 2.1.1 has been revised to include water source information.

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447	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Draft EA does not adequately disclose and analyze the water features of the Project Area and the foreseeable impacts from Project activities. Because of the Project area's semi-arid location (making water features scarce but important), BLM should disclose and analyze the potential impacts on intermittent streams and ephemeral drainages. EPA urged this analysis this in its comment on Shute Creek Disposal Well Pad and Pipeline carbon injection, noting that these watercourses "provide key ecological and hydrological functions by moving water, nutrients, and sediment throughout the watershed." BLM should study the potential for the project to interrupt or destroy the capacity for these watercourses to function properly by providing "landscape hydrologic connections; stream energy dissipation during high-water flows to reduce erosion and improve water quality; surface and subsurface water storage and exchange; groundwater recharge and discharge; sediment transport, storage, and deposition to aid in floodplain maintenance and development; nutrient storage and cycling; wildlife habitat and migration corridors; support for vegetation communities to help stabilize stream banks and provide wildlife services; and water supply and water-quality filtering." These considerations are especially relevant when a project proposes significant excavation since the movement of sediment can risk negatively impacting drainage patterns. The Draft EA does not address ephemeral or intermittent water bodies and offers only that Denbury's Plan of Design proposes that vehicles will stay 500 feet from the outer edge of "riparian areas, wet areas, and drainages." This approach is a good start but fails to address ephemeral or intermittent water bodies and impacts to water bodies from pipelines, long-term infrastructure, and CO2 plumes. Further, mitigation measures or design features do not absolve BLM of its duty to disclose and analyze the environmental setting and impacts. BLM chose to exclude source water protection areas, municipal water sources, and water quality and aquatics from analysis in the Draft EA. For reasons described later in this comment letter, that exclusion was in error. BLM must redo its NEPA analysis and fully disclose and analyze impacts on all facets of water sources, quality, and aquatics.	The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. Specifically, as discussed in EA Section 3.6.3, trenchless construction techniques (e.g., horizontal directional drilling) would be used to avoid surface impacts to waterways and wetlands. Denbury's Reclamation, Mitigation, and Monitoring Plan includes procedures to control erosion and reduce the potential for sediment to be transported offsite or into wetlands or streams. In addition, phased development would result in smaller amounts of disturbance at any given time, which would allow for expedited reclamation. Spill prevention, containment, and response procedures outlined in POD Section 6.1 would be implemented to protect groundwater and surface waters from accidental spills or leaks.
448	McCutchan, Shelly	Risks to land, water, and agriculture: Storing massive amounts of carbon pollution from industrial projects underground, which likely contains other contaminants, harms groundwater quality and quantity and threatens the stability of local geography.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. 40 CFR §261.4(i) states that CO2 streams captured and transported for purposes of injection into an underground injection well are not a hazardous waste, provided certain conditions are met. The CO2 stream must be transported in compliance with USDOT requirements, injection of the CO2 must be in compliance with Class VI UIC well requirements, and no hazardous wastes can be mixed with or otherwise co-injected with the CO2 stream. Both the CO2 generator and the Class VI UIC well owner and operator must certify that the CO2 stream meets these conditions.

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449	Individual	The proposed deep well injection sites may contaminate underground aquifers. Because livestock water relies heavily on groundwater, contamination is a serious concern for producers. Further, the disruption of the landscape that will come with construction of roads, wells, etc. will loosen topsoil, promoting the erosion and the deposition of soil particles into areas of surface water collection. This means that both sources of livestock water will likely be compromised. Water contamination is not only problematic for livestock, it is also detrimental to wildlife habitat. The water contamination and landscape alterations will both disrupt wildlife habitat in the proposed project acreage.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
450	Sara Donahoe	What are the chances of the pressurized CO2 somehow escaping the cap layer, and forcing heavily mineralized water into local aquifers? What is the track record for that sort of event, how does the monitoring work, and is there a remedy if it occurs?	The EPA requires "baseline geochemical data on subsurface formations, including all USDWs in the area of review" for Class VI UIC wells [40 CFR §146.82(a)(6)]. As described in POD Section 5.5, Denbury conducted sampling and analysis of groundwater and surface water samples in 2022 and 2023 as part of its baseline characterization program. Potential fluid leakage (e.g., CO2 or formation fluid) to USDWs would be routinely monitored during the life of the Project in accordance with an EPA-approved T&M Plan and MRV Plan as discussed in POD Appendix A. Routine monitoring would include evaluation of elevated concentrations of indicator parameters in surface water, soil, gas, and ambient air samples. An Emergency and Remedial Response Plan, as required under 40 CFR §146.94(a) and approved by the EPA as part of the UIC permitting process, would be implemented to protect USDWs in the event that movement of the injection or formation fluid may endanger a USDW during construction, operation, and post-injection site care periods. Under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)]. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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451	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Water is a precious resource in this semi-arid region of the state. There is a high degree of community concern that the project might contaminate the groundwater, and other water sources, upon which local ranchers rely to sustain their herds. Ranching operations depend on high-quality ground and surface water for livestock and rotational grazing systems. Wildlife require water in the areas where they live, and the region's natural springs, seeps, and streams (even if intermittent) support wetland and riparian areas around these water sources that are critical to mammals, birds, amphibians, reptiles, and insect life. BLM improperly excluded water quality and aquatics from the Draft EA. Our scoping comment contained studies and other evidence of the impacts CCS projects can foreseeably have on water resources and aquatic species. We urge BLM to consider that information as it is still relevant here. Potential impacts include increasing water demand for capture, to contamination of groundwater through leakage or brine displacement, dissolution of heavy metals, leaching of organic compounds, and impacts of co-injecting hydrogen sulfide (H2S). Even if the Safe Drinking Water Act (SDWA) charges EPA with protecting USDWs when it permits Class VI injection wells, one agency's permitting scheme does not relieve BLM of its NEPA obligation to disclose and analyze impacts of a project. Here, BLM is unlawfully waiving its NEPA duties because of another agency's permitting scheme—and here, permitting that has not yet happened—and proposed design features or mitigations. As has already been articulated, Carter County is already a drought-prone region and its water resources are crucial for the preservation of livelihoods, such as ranchers and farmers, throughout the region. A survey of water resources and analysis of the Project's impacts to these features should be done for at least five miles within all Project activities. Here, Denbury simply did a survey of water features within one mile, and BLM did nothing.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. 40 CFR §261.4(i) states that CO2 streams captured and transported for purposes of injection into an underground injection well are not a hazardous waste, provided certain conditions are met. The CO2 stream must be transported in compliance with USDOT requirements, injection of the CO2 must be in compliance with Class VI UIC well requirements, and no hazardous wastes can be mixed with or otherwise co-injected with the CO2 stream. Both the CO2 generator and the Class VI UIC well owner and operator must certify that the CO2 stream meets these conditions.
452	Individual	This project is proposed to take place in sequence over the next 20 to 30 years. Compromising our families is a risk we are unwilling to take without further research and an EIS. There needs to be further extensive research done to be certain that our water- the only resource that allows life to exist on these prairies- will remain pure and free from human impact.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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453	Robert and Karen Arpan	I am writing to object about the SNOWY RIVER CO2 SEQUESTRATION PROJECT. We do not agree with this project. We are very concerned with what it will do to our underground water supply. Carter County has trouble getting good water wells and this will not help, a leak would contaminate our water supply.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
454	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Second, the Draft EA indicated that the Army Corps of Engineers could provide permits for portions of this Project, yet that agency has not initiated any guidance or rulemaking for how to provide meaningful oversight over CO2 pipelines that cross rivers, streams, and wetlands.	As discussed in EA Section 4.2, the USACE regulates the placement of dredged and fill material in Waters of the U.S., including jurisdictional wetlands under the CWA Section 404 (33 U.S.C § 1344). BLM and Denbury have discussed potential Project impacts with USACE representatives who confirmed that anticipated wetland and stream impacts would likely be eligible for verification under a NWP. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. As described in EA Section 3.6.3, trenchless construction techniques (e.g., horizontal directional drilling) would be used to avoid impacts to waterways and minimize disturbances in wetlands. Where wetland impacts are unavoidable, Denbury would install temporary equipment mats to cross wetlands and would restore temporarily impacted wetlands. Less than 0.1 acre of wetlands would be filled for well pad construction and operation or for installation of culverts or low water crossings along access roads. A description and quantification of each proposed wetland impact is included in POD Section 5.4 and POD Appendix R.
455	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Second, EPA noted that watercourses "provide key ecological and hydrological functions by moving water, nutrients, and sediment throughout the watershed." As such, the Draft EA should have analyzed impacts to these features. Instead, as noted elsewhere in this comment letter, BLM entirely excluded water resources from analysis.	The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
456	Olson, Vicki	On top of that there is the possibility of water contamination. Once it is done it is not reversible. Again this should stop the whole program.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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457	Catherin-Sauer, Augusta; Northern Plains Resource Council	Based on available information, the effects on surface water, wetland and stream resources is likely to be minimal provided that Best Management Practices (BMPs) are followed for culverts/drainage, erosion control, revegetation of disturbed soils, and materials handling/storage. Potential releases of CO2 or displacement of deep pore water could have effects locally or regionally, but available information is insufficient to address these issues at this time.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
458	Catherin-Sauer, Augusta; Northern Plains Resource Council	Water is a precious resource in this semi-arid region of the state. There is a high degree of community concern that the project might contaminate the groundwater, and other water sources, upon which we rely to sustain our herds. Ranching operations depend on high-quality ground and surface water for livestock. Wildlife requires water in the areas where they live, and the region's natural springs, seeps, and streams (even if intermittent) support wetland and riparian areas around these water sources that are critical to mammals, birds, amphibians, reptiles, and insect life. BLM improperly excluded water quality and aquatics from the Draft EA. Even if the Safe Drinking Water Act (SDWA) charges EPA with protecting USDWs when it permits Class VI injection wells, one agency's permitting scheme does not relieve BLM of its NEPA obligation to disclose and analyze impacts of a project. Here, BLM is unlawfully waiving its NEPA duties because of another agency's permitting scheme—and here, permitting that has not yet happened—and proposed design features or mitigations. As has already been articulated, Carter County is already a drought-prone region and its water resources are crucial for the preservation of livelihoods, such as ranchers and farmers, throughout the region. A survey of water resources and analysis of the Project's impacts to these features should be done for at least five miles within all Project activities. Denbury simply did a survey of water features within one mile, and BLM did nothing.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
459	Dinstel, Dan	More specifically, I would like to address the impacts of this project in reference to water and geology. While water and geology are separate issues they are also intertwined. Looking at one must be aware of and take into consideration the other. In this semi-arid region dominated by livestock grazing, water is of paramount importance. There is a reason the 100,000 + acres of this project is in one large BLM block. The homesteaders understood the importance of water and settled along drainages where the water table was near the surface. Yet today the area is still used primarily for grazing and the disastrous effects of CO2 leaking to the surface through existing faults and fissures or the plume migrating outside the project limits will put ranchers out of business. This little bipolar molecule called water is the lifeblood of all living things.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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460	Dinstel, Dan	There has been no water analysis conducted more than 1 mile from the project boundary. Area ranchers have water wells that could potentially be impacted yet no baseline data outside the project has been established.	The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. The EPA requires "baseline geochemical data on subsurface formations, including all USDWs in the area of review" for Class VI UIC wells [40 CFR §146.82(a)(6)]. As described in EA Section 3.6.1 and POD Section 5.5, Denbury conducted sampling and analysis of groundwater and surface water samples in 2022 and 2023 as part of its baseline characterization program. The baseline geochemical data collected at and near the Project to date includes Delta Carbon-13 ($\delta^{13}C$) stable isotope analysis of surface water and groundwater samples, which was determined to be an effective metric for distinguishing different sources of water (POD Appendix S, Section 5.6).
461	Hunkins, Sarah; Western Organization of Resource Councils	The risks of carbon sequestration include storage leaks that could contaminate groundwater and soil, and well failure during injection or blowout that can release large amounts of CO2 into the air or surrounding groundwater. Potential impacts range from increasing water demand for capture to contamination of groundwater through leakage or brine displacement.	As noted in EA Section 1.0, under the Safe Drinking Water Act, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. The Project is subject to federal, state, and local regulatory requirements, which include Montana DNRC water use/discharge permits. Specific to protection of drinking water, the ROWs are contingent on approval of the EPA UIC Class VI permit, the authorizing agency under the SDWA. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Denbury updated POD Section 1.2 to clarify that specific sources of CO2 for the Project have not yet been identified because several stages in the Project sequence (see Figure 3 in EA Appendix D) will need to occur before contracts with emitters to permanently sequester CO2 are secured. See POD Section 1.2 for additional information. Although the upstream CO2 sources are currently unknown, they would be existing and independent of this Project. As such, they would be subject to regulatory permit requirements.

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462	Gleason, Carolyn; US EPA Region 8	The EA eliminated Water Quality and Aquatics from detailed analysis (Section 1.7). We recommend including an analysis of water resources in the EA, including a baseline inventory of the existing water resources in the Project area and an analysis of any potential impacts to these resources. As referenced in our November 2023 Project scoping comments, CO2 injection has the potential to adversely impact water resources (e.g., springs, baseflow to nearby streams, and USDWs) through the vertical migration of CO2 enriched brines and mobilized trace metals between aquifers of variable depths. This may occur despite preventative planning efforts because undetected faults and fractures and geologic heterogeneities encountered in the subsurface in the field can unpredictably either trigger or limit fluid migration as the underground storage reservoir is pressurized. Injection and in-zone monitoring well casings and cement can also degrade over time and fail, potentially enabling the mobilization of metals into the aquifer or CO2 emissions into the atmosphere. While the intent of the standards set by the UIC Program Class VI well permitting process is to prevent and mitigate such impacts, the Draft EA does not adequately describe these protection measures, nor does it acknowledge that sources of uncertainty may still result in adverse environmental impacts to water resources. We therefore emphasize the importance of presenting the baseline conditions of regional water resources and: - Describing how the UIC Program Class VI well permitting process, as set forth in the POD Appendix A, protects groundwater and surface water resources; - Identifying what uncertainties exist (e.g., see examples above); and - Evaluating the nature and potential extent of any potential impacts to water resources due to these uncertainties. The construction and operation of 40 additional miles of CO2 pipelines and increased traffic along access roads could also result in adverse impacts to aquatic resources within and downstream of the Project area. The Draft EA addresses these impacts primarily by leveraging best management practices (BMPs) and permitting programs as a mitigation method. While these BMPs include storm water, erosion, and stream crossing controls which may help protect regional water quality, it is not clear to what extent these BMPs will prevent impacts, or whether there are BMPs to address impacts to aquatic resources related to CO2 leaks from the proposed pipelines. These pipelines would underly some wetlands and stream crossings, putting these aquatic ecosystems at risk of potential leaks which may lower dissolved oxygen concentrations and threaten ecosystem health. CO2 enrichment may also acidify waters and remobilize hazardous metals, creating another avenue for potential water quality impacts related to the Project. We therefore recommend redeveloping the Water Quality and Aquatics resource impacts analysis to expand on the potential impacts from Project elements which may not be eliminated by the UIC Program well permitting process or planned BMPs. This should include an evaluation, data driven to the extent data are available, of the effectiveness of the applicable Project BMPs.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. Specifically, as discussed in EA Section 3.6.3, trenchless construction techniques (e.g., horizontal directional drilling) would be used to avoid surface impacts to waterways and wetlands. Denbury's Reclamation, Mitigation, and Monitoring Plan includes procedures to control erosion and reduce the potential for sediment to be transported offsite or into wetlands or streams. In addition, phased development would result in smaller amounts of disturbance at any given time, which would allow for expedited reclamation. Spill prevention, containment, and response procedures outlined in POD Section 6.1 would be implemented to protect groundwater and surface waters from accidental spills or leaks. Where wetland impacts are unavoidable, Denbury would install temporary equipment mats to cross wetlands and would restore temporarily impacted wetlands. Less than 0.1 acre of wetlands would be filled for well pad construction and operation or for installation of culverts or low water crossings along access roads. A description and quantification of each proposed wetland impact is included in POD Section 5.4 and POD Appendix R. As discussed in EA Section 4.2, the USACE regulates the placement of dredged and fill material in Waters of the U.S., including jurisdictional wetlands under the CWA Section 404 (33 U.S.C § 1344). BLM and Denbury have discussed potential Project impacts with USACE representatives who confirmed that anticipated wetland and stream impacts would likely be eligible for verification under a NWP.
463	Castleberry, Pam; Carter County	I am also aware of the inadequate water resources in the area. In the early 1980's, the Carter County Conservation District attempted to drill a water well in the area, as reported to me the plan was to drill 3,000 feet. Grants were applied for and local ranchers pledged financial assistance to this project. When the bid came in three times more that the secured amount, the project was dropped. Several other wells were drilled from 500 to 900 feet to no avail. I'm aware of at lease two families who transport water from the Town of Ekalaka for their household use. Water resources in this area is valuable, we must be assured that our resources cannot be contaminated.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. Under the Class VI Permit, Denbury must demonstrate and maintain financial responsibility (as determined by the EPA) sufficient to protect the endangerment of USDW [40 CFR 146.85(a)(3)] as well as corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response [40 CFR 146.85(a)(2)].

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464	Courtney, Adam	As a land owner and producer in this county am deeply concerned about pumping toxic (dirty) CO2 gas into our pristine water aquifers that many in this county depend on for livestock and as a drinking water source. These actions will be irreversible to our natural resources and will have long standing consequences to the area producers. This proposed project amounts to nothing more than the BLM selling out federal lands and resources that are owned by the citizens to be used as a "dumping grounds" for waste gasses owned by Exxon. At the meeting in Ekalaka, not a single BLM person could tell me what the desired positive outcome is supposed to be from pumping 150million tons of C02 below the earth into our groundwater. This absolutely does not have the best interest of the citizens of Carter county or our natural resources in mind. We stand strongly against this project, and will expend every avenue available through our county to stand in opposition to it.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
465	Lohrer, Laurie	CCS significantly increases water used by power plants. Montana is having a long term drought- need I say more?	The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency. Denbury updated POD Section 1.2 to clarify that specific sources of CO2 for the Project have not yet been identified because several stages in the Project sequence (see Figure 3 in EA Appendix D) will need to occur before contracts with emitters to permanently sequester CO2 are secured. See POD Section 1.2 for additional information. Although the upstream CO2 sources are currently unknown, they would be existing and independent of this Project. As such, they would be subject to regulatory permit requirements.
466	Lohrer, Laurie	The project poses huge potential risk water quality- this is POLLUTED material from fossil burning fossil fuel, mining and oil/gas drilling.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
467	Rydell, Carol and Robert	Also Carter County is threatened by drought so it would be disastrous to take so much valuable and limited water and use it for the project.	The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency.

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468	Kaeding, Beth	The proposed project poses short-term and long-term threats to water quality and quantity during construction and by the increased water requirements of a power plants required by the proposed project.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency. Denbury updated POD Section 1.2 to clarify that specific sources of CO2 for the Project have not yet been identified because several stages in the Project sequence (see Figure 3 in EA Appendix D) will need to occur before contracts with emitters to permanently sequester CO2 are secured. See POD Section 1.2 for additional information. Although the upstream CO2 sources are currently unknown, they would be existing and independent of this Project. As such, they would be subject to regulatory permit requirements.
469	Caspbara, Bp	Underground storage of massive amounts of carbon pollution from industrial projects - which likely contains other contaminants- endangers groundwater quality and quantity, land, and agriculture operations, and risks the stability of local geography. With much of MT experiencing drought conditions, devoting water to CCS is too risky.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency. 40 CFR §261.4(h) states that CO2 streams captured and transported for purposes of injection into an underground injection well are not a hazardous waste, provided certain conditions are met. The CO2 stream must be transported in compliance with USDOT requirements, injection of the CO2 must be in compliance with Class VI UIC well requirements, and no hazardous wastes can be mixed with or otherwise co-injected with the CO2 stream. Both the CO2 generator and the Class VI UIC well owner and operator must certify that the CO2 stream meets these conditions.

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470	Fuglevand, Lester	The project does not pose short-term and long-term threats to water quality.	The BLM acknowledges this comment in support of the Project. EA Section 1.0 discusses how, under the SDWA, the EPA is the authorized federal agency tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies. Prior to the use of the BLM ROW, Denbury would be required to submit verification of the EPA approved UIC permit to the BLM. This would ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
471	Aus, Kristin	The Snowy River CO2 Sequestration Project is likely to damage the water situation here in drought-ridden eastern Montana. CCS can use a lot of water and that will damage our rural communities and our farmers and ranchers.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency.
472	Iverson, Linda	I have concerns about the development area in Carter County being negatively impacted. There is not enough research available to ensure that the CO2 injection will not contaminate ground water.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.

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473	Summers, Steve	I find it very upsetting and hypocritical that the BLM won't allow livestock producers to run waterline for cattle, but is making exceptions for EXXON to run much larger and more dangerous pipelines, not to mention the wells that will be drilled endangering our aquifers. Proof that lobbying and money are at the core of this project. Good water is not only paramount but difficult to obtain in this area.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency. As noted in EA Section 4.2, PHMSA regulates the construction, operation, and maintenance of CO2 pipelines (49 CFR §§ 190 and 195-199). These regulations cover all phases of a pipeline or facility's lifecycle, including materials, design, construction, operation, maintenance, integrity management, and abandonment. Denbury will operate under a manual that outlines the procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies, as specified in 49 CFR §195.402.
474	Pacini, Paul	Storing massive amounts of carbon pollution from industrial projects underground, which likely contains other contaminants, risks harm to groundwater quality and quantity as well as risks to the stability of local geography.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details. 40 CFR §261.4(h) states that CO2 streams captured and transported for purposes of injection into an underground injection well are not a hazardous waste, provided certain conditions are met. The CO2 stream must be transported in compliance with USDOT requirements, injection of the CO2 must be in compliance with Class VI UIC well requirements, and no hazardous wastes can be mixed with or otherwise co-injected with the CO2 stream. Both the CO2 generator and the Class VI UIC well owner and operator must certify that the CO2 stream meets these conditions.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
475	Smith, Joan	I want to comment on the proposal to permanently store carbon dioxide in underground rock formations on public land in Carter County. The project's construction would pose many short-term and long-term threats to water quality and quantity which the local community relies on.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
476	Lohrer, Roger	The project poses serious threats to water quality and quantity.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
477	Walton, Kathy	I am just not for pumping millions of tons of carbon pollution underground anywhere in Montana. If it leaks it could potentially harm groundwater and people's lives.	As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with overseeing the nation's public drinking water supplies and protecting public health by regulating all aspects of injection wells including project siting, well construction, injection operations, testing and monitoring, emergency response, financial responsibility, and eventual plugging and closure of the wells and injection sites in accordance with UIC regulations in 40 CFR Part 146 Subpart H. Section 3.6 has been added to the EA to discuss water quality and related public health impacts; this section includes a disclosure that the BLM ROW grant would include a Notice to Proceed provision requiring Denbury to submit verification of EPA approved UIC permits before use of the BLM ROW for CO2 injection. This would make the ROW contingent on the EPA UIC permit to ensure protection of USDWs would be protected through compliance with EPA UIC Class VI regulatory requirements that are designed to protect USDWs by preventing the movement of CO2 and formation fluids out of injection formations and into USDWs. See Section 3.6 for additional details. The BLM took a hard look at potential impacts to water resources from issuance of ROW grants. EA Section 3.6 has been added to the EA to clarify the results of BLM's assessment of potential water quality impacts and to expand upon the affected environment and environmental effects of the no action alternative and the proposed action alternative. See EA Section 3.6 for additional details.
478	Kuether, Charles	CCS has the likely potential to increase the water requirements of a power plant by a significant percentage. At a time when much of Montana is subject to extended drought conditions, devoting water to CCS is risky, uncalled for and unnecessary	The Project is subject to federal, state, and local regulatory requirements. See POD Section 2.4 for a complete list of permits and approvals that would be required for the Project. Permits for the use and discharge of water would be obtained from the MDEQ, the authorizing agency.
Wildlife and Threatened and Endangered Species			

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
479	Brad Schmitz; Montana Fish, Wildlife & Parks Region 7	FWP commends the BLM and Denbury for the additional habitat mitigation measures of pages 65 and 66 of the EA, such as anti-perch deterrents at each injection well along with restrictions during certain times of year or under harsh winter conditions. FWP suggests the following measures and adjustments to reduce likely negative impacts: Please add injection wells 3, 8, and 10, and potentially both pump stations, to the list of infrastructure and associated access roads that should be avoided for routine maintenance and monitoring when severe winter conditions (as identified on page 66 of the EA) occur. These additional sites and/or portions of their access roads have been identified by FWP to be in or near areas with significant pronghorn use (particularly important during winter and summer fawn rearing) and/or are near or within a critical sage grouse wintering area.	EA Section 1.7.4 states that Denbury committed to complete all construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to mitigate disturbance to grouse, migratory birds, raptors, and winter big game areas. The condensed construction schedule would avoid sage-grouse nesting, breeding, and early-brood rearing seasons season (March 15 through July 15); migratory bird and songbird nesting season (May 1 through July 15); avoid bald and golden eagle breeding season (March through July), and reduce disturbances during the crucial winter range season for big game species including pronghorn (Antilocapra americana) and mule deer (Odocoileus hemionus) and sage-grouse, which generally occurs between December and April. EA Section 3.5.3 has been revised to clarify that vehicle travel to the listed wells is restricted and to include access road to Well 03. The BLM does not have jurisdiction to Well 08 or its access road. Operational travel to the pump stations were not restricted to ensure Denbury has continuous access, as needed, to monitor critical infrastructure. Well 10 is along the same access road to the South Pump Station, within close proximity to a frequently traveled county road; therefore, access to the well was not restricted. The North Pump Station is not in sage-grouse wintering areas. EA Section 3.5.1 has also been revised to include additional context regarding the effects that severe winter weather and drought can have on sage-grouse mortality. Application of the mitigation measures listed in EA Section 3.5.3 are associated with the sage-grouse population. In addition to Denbury's committed measures and design features in the POD, these mitigation measures applied for sage-grouse may also serve to provide additional protection to big game species, including antelope, in the area.
480	Brad Schmitz; Montana Fish, Wildlife & Parks Region 7	Due to this important wildlife use, FWP also suggests that Denbury use additional noise reduction measures on both pump stations to reduce the area of avoidance by wildlife.	A summary of the noise analysis as it relates to the closest sage-grouse leks has been added to EA Section 3.5.3. As disclosed in EA Section 3.5.1, studies have found that anthropogenic sounds that exceed 10 A-weighted decibels (dBA) above the existing sound level have the potential to affect sage-grouse populations. This finding is consistent with Governor's EO 12-2015 which states that new project noise levels, either individual or cumulative, should not exceed 10 dBA above baseline noise at the perimeter of an active lek from 6:00 p.m. to 8:00 a.m. during the breeding season (March 1 – July 15). Denbury's noise analysis found that there would be no changes to the existing ambient sound levels at the closest leks. In consideration of a comment received during the scoping period regarding the potential effects of noise levels greater than 49 dBA within songbird breeding habitat, the BLM requested that Denbury evaluate the distance at which sound levels from the pump stations may exceed 49 dBA. A 49 dBA contour was added to the noise figure in EA Appendix D to demonstrate the extent at which noise from each pump station may reach 49 dBA. The contour extends approximately 0.2 mile from the edge of each pump station. Approximately 91 acres, or 0.08% of the Project area, falls within the 49 dBA contour surrounding the Pump Station North. Approximately 67 acres, or 0.06% of the Project area, falls within the 49 dBA contour surrounding the Pump Station South. Based on the limited portion of the Project area that may have sound levels that reach 49 dBA, the abundance of surrounding songbird breeding habitat, and the close proximity of each pump station to existing county roads, where vehicle traffic may also contribute to elevated noise levels, the BLM determined that noise impacts to songbird breeding habitat was not an issue that warranted further analysis. EA Section 1.7.4 has been revised to address this topic.
481	Brad Schmitz; Montana Fish, Wildlife & Parks Region 7	FWP appreciates BLM's suggestion that burying the proposed powerlines would be preferable. FWP agrees and urges that any new powerlines be underground. However, if they are above ground, FWP suggests that perch deterrents be installed on all new poles and lines to minimize raptor use. This measure would hopefully reduce impacts on many native species of prey, especially sage grouse and waterbirds.	A ROW for the corridor was considered for analysis purposes only and is not proposed as part of the proposed action. The owner operator of the transmission line, Southeastern Electric Cooperative, would need to submit a separate subsequent ROW application for the power line within the proposed corridor for the BLM to conduct a separate NEPA analysis that may impose mitigation requirements for construction and operation of the powerline. Sections 2.1.2 and 3.5.3 have been updated to incorporate Denbury's committed measure to ensure construction of the powerline is in accordance to BLM design features and best practices listed in the *Avian Power Line Interaction Committee's Suggested Practices for Avian Protection on Power Lines.* Adherence to the APLIC suggested practices would be addressed in Southeastern Electric's future ROW application and review process.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
482	Mccutchan Royer, Shantel	What is the BLM and Denbury/ExxonMobil doing to protect the species of concern in Carter County ? Have there been studies done on the proposed site for these species and to what extent ? 1.Townsend's Big-eared bat 2. Back-tailed prairie dog 3.Eastern red bat 4.Hoary bat 5. Fringed Myotis 6. Dwarf shrew 7. Swift fox 8. Spragues pipit 9. Golden eagle 10. Burrowing owl 11. American bittern 12. Ferruginous hawk 13. Chestnut-collared longspur 14. Veery 15. Greater sage-grouse 16. Bairds sparrow 17. Black tern 18. Yellow-billed cuckoo 19. Black-billed cuckoo 20. Loggerhead strike 21. Red headed woodpecker 22. Long billed curlew 23. Sage thrasher 24. Brewer's sparrow 25. Snapping turtle 26. Plains hog-nosed snake 27. Greater short-horned lizard 28. Argos skipper 29. Gray comma 30. Monarch	The MCFO interdisciplinary team considered the Montana Natural Heritage Program database, USFWS IPAC database, internal BLM data, staff expertise, and other information, as appropriate, to determine if special status species or associated habitats are known to occur or could occur in the Project area. As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse), fisheries, including special status species, and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Also, EA Section 4.2 discloses coordination with USFWS. Based on the May 4, 2022 letter, the USFWS indicated that additional efforts for protected butterfly species (Dakota skipper) would not be needed for the Project. However, for the NLEB, the BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on NLEB. See EA Sections 1.7.4 and Section 4.2, and letter in POD Appendices M and N for additional details and surveys completed.
483	Mccutchan Royer, Shantel	Have there been any studies done in the area for Swift Fox? And what is being done to protect them? Are they on blm ground?	Recent MTFWP efforts to monitor swift foxes have found they are more common than previously thought in southeastern Montana. There are only 29 swift fox observations submitted to the Montana Natural Heritage Program in Carter County as of June 2024, of which 23 of these reports occurred in 2017 when targeted survey efforts were conducted. Suitable swift fox habitat is generally defined as extensive grassland expanses (preferably over 100,000 acres), with relatively level topography, and with greater than 50% of the area undisturbed by agriculture. Most of Carter County contains high quality swift fox habitat and, although not documented, they are expected to be present in the Project area. EA Section 1.7.4 discusses the applicant committed measures identified in the POD and the associated Reclamation, Mitigation, and Monitoring Plan (POD Appendix G) to restore and maintain vegetation community health, connectivity, and diversity associated with wildlife habitats. The construction schedule, reduced surface disturbance, and reclamation efforts would substantially reduce effects to wildlife species. Denbury has committed to complete construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to mitigate disturbance to grouse, migratory birds, raptors, winter big game areas and other sensitive status species such as swift fox.
484	Not Provided	Have there been any surveys done for coyotes, eagles or other predators on the site? The disruption to their territory will likely push them onto neighboring lands/ranches. Adding more stressors to the local ranches and their livelihoods.	Denbury conducted wildlife surveys in 2022 and 2023 in accordance with BLM survey protocols. Results are summarized in POD Section 5.3 and reports are provided in POD Appendices M and N. Raptor nest surveys (for bald and golden eagles) were completed via helicopter in May 2022 and April 2023. Winter aerials surveys for big game species (pronghorn and mule deer) were completed on several occasions between December 2022 and February 2023. Coyotes were incidentally observed during the big game aerial surveys. Although localized temporary displacement could occur during construction, it would be limited to between July 16 and November 30 in any given year in accordance with time-of-year restrictions to avoid and minimize impacts to protected species. The phased development of 8 construction ROW groups over a 20-year period would further minimize disturbance.

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485	Barbour, Drew	As a soil specialist I can say that the EA's review on that topic was minimal and skewed. Soils hold water because they are compacted. If the soil out there is a contributor to mosquitos and, therefore, West Nile which kills sage grouse, we have been surveying two different landscapes. Sage grouse are dying a death by a thousand cuts, WNV being a scratch. Standing water on this landscape is due to compaction; a phenomenon presented when annual grasses take hold like VENTENATA (made Montana's top 10 invaders list) which is a deadly threat to sage grouse. The project area is a host to ventenata which will continue to spread if the ROW is approved and Greater SG habitat will be decimated; even, eventually, on Exxon's precious Conservation Easement purchase. As this project continues to contribute to compaction ventenata will spread like wildfire compromising all of us whose private and grazing lands surround this proposal. Conclusively, the proposal's effects will decimate wildlife populations on more acres than this EA addresses.	EA Section 3.5 analyzes impacts to sage-grouse and associated habitats. The analysis describes in detail current habitat and population conditions, and potential stressors in the area. These stressors include drought, a series of severe winter, a high percentage of agriculture on private, predation, invasive weeds like Ventenata, and WNV. EA Section 3.5 has also been updated to further clarify current conditions and analysis. The EA discloses soil properties within the Project area that contribute to standing water, which could increase the potential for mosquito habitat and consequently the spread of WNV. Slow percolation rates occur in soils with low saturated hydraulic conductivity and/or high Sodium Adsorption Ratios. This is not caused by soil compaction but rather from dispersive clay particles within the soils. Dispersive clay particles are dislodged from soil peds through the erosive force of water. These clay particles then plug the interstitial pore spaces reducing infiltration rates. As noted in Section 1.7.4 of the EA, Denbury has prepared a comprehensive Noxious Weed Management Plan (POD Appendix J) that meets the 2015 MCFO RMP objectives to prevent the expansion or eliminate the occurrence of invasive, non-native, or noxious weed species within the proposed ROWs. Section 5.10 and Ventenata Survey Report Appendix U in POD discusses the noxious weed inventory, mapping, and control efforts conducted by Denbury. EA Section 3.5.1 was revised to clarify that approximately 120 acres of noxious weeds were mapped within the proposed ROWs, as presented in the Attachment A of the Noxious Weed Management Plan in POD Appendix J. In addition to the 120 acres mapped, the BLM identified several areas of previously-recorded ventenata infestations outside of the proposed disturbance footprint but inside the Project area. Denbury treated approximately 800 acres, 1,200 acres, and 1,145 acres of ventenata, in 2022, 2023, and 2024, respectively, which included acres within the proposed disturbance footprint and within the overall Project area. Denbury would continue to coordinate with the BLM to map and treat all noxious and invasive weeds annually in compliance with the BLM-approved Pesticide Use Permit.

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486	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Under NEPA, BLM must evaluate potential impacts of the whole of the Project on wildlife, plants, and habitats in the project area. This includes species listed under the Endangered Species Act (ESA) (see also section IX, infra, discussing ESA consultation obligations), as well as those that are not listed. Notably, the Project area includes numerous listed species as well as others, such as pronghorn (Antilocapra americana), mule deer (Odocoileus hemionus), and coyotes (Canis latrans). Additionally, where listed species or designated critical habitat may be affected by the proposed project to be permitted, licensed or otherwise authorized by BLM, the agency must consult with the U.S. Fish & Wildlife Service (FWS) on impacts of the proposed project to protected species and habitat under the ESA. BLM's Draft EA does not satisfy NEPA's "hard look" requirement. Under NEPA, BLM must analyze impacts on species from activities such as Project construction, noise, light pollution, traffic, and ongoing CO2 injection and monitoring activities. Because the Project involves CO2 pipelines, storage, and injection, this impacts analysis must also include the risks to wildlife and plants from CO2 leaks. Examples of CO2 harms to wildlife and plants, and research on this topic which BLM must address in its NEPA review, include: • In 1986, a sudden, catastrophic release of CO2 from Lake Nyos in Cameroon killed 1,700 people and 3,000 cattle. The CO2 spread 10 km from the lake. Bird, insect, and small mammal populations in the area were not seen for at least 48 hours after the event. • Experiments with controlled injections of CO2 into soil showed adverse effects on plants in response to CO2 exposure. Biomass changes were seen in all plants studied; for example, clover plants decreased by 79% while grass decreased by 42%. The researchers' overarching conclusion was that elevated concentrations of soil CO2 damages both soil microbiology and growing vegetation. • Other research on CO2 and plants showed reduced plant growth and extensive mortality at the point with CO2 concentrations were greatest in the soil. For the plants that survived, root and shoot growth was significantly lower than in controls. Reproductive variables such as number of seeds per plant and seed dry weight per plant were also reduced compared to controls.	As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse) and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Denbury has committed to complete all construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to avoid or minimize disturbance to grouse, migratory birds, raptors, and winter big game areas. In addition to restricting construction, drilling, routine maintenance, and reclamation activities, pipeline and injection well operations would be remotely monitored, and operational vehicle traffic for monitoring is expected be up to one vehicle visit per well per day, or less, depending on weather and operation conditions. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. Under Alternative 2, if ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury completed noise modeling of the pump stations, which are the facilities that would generate noise during Project operations. Sections 1.7.5 and 3.5.3 have been revised to summarize results of the noise analysis. EA Section 4.2 discloses coordination with USFWS and compliance with ESA Section 7. Based on the May 4, 2022 letter, the USFWS indicated that additional efforts for protected butterfly species (Dakota skipper) would not be needed for the Project. However, for the NLEB, the BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on NLEB. It is within the scope of the BLM's legal authority as the action agency to determine that the action has no effect, and section 7 consultation is thus not required. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. See EA Sections 1.7.4 and Section 4.2, and letter in POD Appendices M and N for additional details and surveys completed. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).*

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487	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM erred by excluding wildlife and habitat from the Draft EA. As we establish in this comment letter, there are numerous species and habitats that will be significantly impacted by this project (e.g., the entire Project is occurring in GRSG PHMAs, and possible mitigations are unsupported and do not purport to eliminate all significant impacts); there are also likely impacts to species (such as from CO2 leaks). Instead, BLM relies on Denbury's "committed measures identified in" the Plan of Development. These applicant-proposed measures are unenforceable, unsupported by evidence, and still leave significant impacts. BLM's dismissal of wildlife and habitat impacts falls short of BLM's duties under NEPA.	Wildlife and habitat were considered in the EA. As noted in EA Section 1.7.4, the BLM determined that impacts to wildlife (except sage-grouse) and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Section 3.5 of the EA analyzed impacts to sage-grouse and associated habitats. As noted in EA Section 1.7.1, Denbury has prepared an Emergency Response Plan for the Project (POD Appendix W), which provides techniques and guidelines for achieving an efficient, coordinated, and effective response to emergencies involving Denbury's personnel or facilities. The plan details how Denbury would address potential emergencies such as fire during construction and operation, fluid leakage to USDWs and/or the surface, natural disasters (e.g., tornado, blizzard), spills, and releases. It includes compliance with USDOT PHMSA regulatory requirements, incorporates EPA UIC Program Class VI regulatory requirements, and follows the American Petroleum Institute's *CO2 Emergency Response Tactical Guidance Document: Best Practice Guidelines for Preparedness and initial Response to a Pipeline Release of Carbon Dioxide (CO2).* The POD committed measures and design features are enforceable by the BLM. Section 7 of the BLM ROW SF-299 application requires a project description, which may be submitted in a POD. As part of the ROW grant, if issued, stipulate that the ROW is subject to the terms and conditions in 43 CFR Part 2800, the terms and conditions/stipulations, design features and/or mitigations set forth in the application, POD, and the grant. Furthermore, EA Section 1.5 states that the ROW grant would be subject to terms and conditions in 43 CFR Part 2800, the terms and conditions and stipulations specified, and mitigations set forth in the application and POD. Therefore, all applicant committed measures and design features in the POD are enforceable by BLM through the ROW grant.
488	O'Grady, Morgan; Western Environmental Law Center et al.	BLM has failed to fully evaluate the reasonably foreseeable impacts to big game and greater sage grouse from development of the Project. This extends beyond a description of the regulatory and management frameworks applicable to big game species or greater sage grouse, the scientific literature, and existing conditions. Such information provides a baseline for analyzing the likely impacts to big game from development of the Project, but it does not substitute for a meaningful analysis. Failure to analyze the likely impacts to big game species—which BLM acknowledges are present in the project area—accompanied by boilerplate statements about categories of impacts do not satisfy NEPA. BLM instead must analyze the site-specific, direct, indirect, and cumulative impacts of leasing the parcels on the biology, ecology, reproduction, migration, connectivity, and viability of individual herds and entire populations of pronghorn, mule deer, and other big game species.	As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse) and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Section 3.5 of the EA analyzed impacts to sage-grouse and associated habitats. Denbury has committed to complete all construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to mitigate disturbance to grouse, migratory birds, raptors, and winter big game areas. In addition to restricting construction, drilling, routine maintenance, and reclamation activities, pipeline and injection well operations would be remotely monitored, and operational vehicle traffic for monitoring is expected be up to one vehicle visit per well per day, or less, depending on weather and operation conditions. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. The timing restrictions would further minimize impacts to sage-grouse as well as pronghorn, mule deer, and other big game species.
489	O'Grady, Morgan; Western Environmental Law Center et al.	Similarly, BLM's failure to adequately analyze likely impacts to sage-grouse populations violates NEPA. BLM discusses downward trends in sage-grouse populations and proposed mitigation measures for the Project. It is likely, however, that the Project will further decrease the reliance and abundance of the struggling greater sage grouse populations through habitat fragmentation and impacts to leks, which BLM does not adequately analyze or discuss in the Draft EA.	EA Section 3.5 analyzes impacts to sage-grouse and associated habitats. The analysis describes in detail current habitat and population conditions, and potential stressors in the area. These stressors include drought, a series of severe winter, a high percentage of agriculture on private, predation, invasive weeds like Ventenata, and WNV. Under the No Action Alternative, the BLM discloses these ongoing existing environmental stressors would likely continue to negatively impact the local sage-grouse population. Under Alternative 2, due to the project's spatial and temporal scale, in addition to the design features and committed measures, the proposed action is not expected to impact the quantity or quality of sage-grouse habitat. EA Section 3.5 has also been updated to further clarify current conditions and analysis of the full project (new disturbance/activities and mitigation). In addition, under Alternative 2, the BLM concluded that the Project's operational activities (i.e., above ground structures and vehicle traffic during lekking and severe winters) would add additional stressors to the existing local sage-grouse population in the area by modifying behavior and seasonal use. However, with the proposed BLM measures, applicant committed measures listed in EA Section 3.5.3. and POD Sections 4 and 5, and compliance with the Montana EO 12-2015 the magnitude of these existing and operational stressors from proposed action would be avoided, minimized, and as needed offset. More specifically, by limiting disruption or disturbance during lekking, winter, breeding, brood-rearing and potentially burying the future proposed power line, these stressors would drastically minimize avoidance by sage-grouse in the Project area.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
490	Barbour, Liz; J Bar L Ranches	Pronghorn are another species that rely on this project area for winter grazing grounds. Our ranch participates in studies by FWP to support this fact. It is a wonder how pronghorn are only present in the Northern Great Plains Region. If we continue to be disruptive to their habitat, could we be imposing unknown consequences to the presence of that species as well? To name a few more rare species that will be affected by this project; there are the pallid sturgeon found in the tributaries to the Powder River that run off of this project, as well as the furruginous hawk and his raptor friends, protected as a whole by FWP, who's habitat will be affected.	As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse), fisheries, including special status species, and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Specific for pallid sturgeon, BLM determined in EA Section 1.7.4 that there are no pallid sturgeon or potential habitat for the species in the project area. EA Section 1.7.4 was revised to include clarification that Timber Creek and its tributaries drain to the Powder River, which contains known pallid sturgeon habitat. None of the proposed ROW elements (injection wells, bulklines, or access roads) intersect Timber Creek or tributaries thereto; therefore, the Project is not anticipated to impact any streams within the Powder River watershed. Furthermore, the USFWS did not include pallid sturgeon in its recommendation of species to include in the analysis. See EA Section 4.2 for coordination with USFWS. Denbury has committed to complete all construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to mitigate disturbance to grouse, migratory birds, raptors, and winter big game areas. In addition to restricting construction, drilling, routine maintenance, and reclamation activities, pipeline and injection well operations would be remotely monitored, and operational vehicle traffic for monitoring is expected be up to one vehicle visit per well per day, or less, depending on weather and operation conditions. EA Section 3.5.3 describes additional BLM measures if the ROW grants are approved. These include restrictions of motorized vehicle use for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). The timing restrictions would further minimize impacts to sage-grouse as well as pronghorn, mule deer, and other big game species.
491	Robert and Karen Arpan	It will disrupt all of the wildlife with all of the travel through their areas. They know there are 17 sage grouse liks in the area you are planning on taking over. Here in the Alzada area you are not letting the bentonite trucks get off the Alzada Ridge Road until after 9:00 AM in the morning to protect the Sage Grouse. What is the difference between the Snowy River Project and hauling bentonite.	All surface disturbing or disruptive activities proposed on BLM lands are reviewed in separate NEPA analysis in accordance with the 2015 MCFO RMP, as amended. Each review considers spatial and temporal impacts to resources, and, as needed, appropriate mitigation measures applied to the proposed action. For this analysis, as disclosed in EA Section 3.5.1, there are 17 CA leks within the Project area and within a 3.1-mile buffer surrounding the Project. Table 3-18 shows the distance of each lek to existing disturbances, new surface disturbances, and new aboveground structures associated with the Project. Thirteen leks would be within 3.1 miles of the proposed surface disturbance, road use, and aboveground infrastructure, with the closest lek being approximately 0.8 mile from a surface disruption (road or wellpad). EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
492	Brad Schmitz; Montana Fish, Wildlife & Parks Region 7	Technically, through the lens of mitigation credits, Denbury would be compensating for the impacts of the proposed project via the conservation easements. However, FWP believes the actual negative impacts to wildlife habitat on-the-ground will likely be much greater in the 110,100-acre project area than the conservation values gained through the easements for the following reasons. First, the Ringling Ranch easement is not within a Priority Sage Grouse Habitat Protection Area, whereas the proposed project is. Each unit of area within Priority Habitat is likely more valuable to sage grouse habitat and populations compared to a location outside of Priority Habitat. Additionally, the second to last sentence under "Cumulative Effects" on page 62 of the EA states: The conservation easement at the LO Ranch would ensure development on private lands does not occur between the two large tracts of undisturbed BLM land, thereby reducing habitat fragmentation and, at a landscape level, providing contiguous quality habitat for the sage-grouse population in southern Carter County and northeastern Wyoming. While development on the 6,212 private land acres of the LO Ranch would be prohibited in perpetuity, FWP disagrees with the assumption that this easement would reduce habitat fragmentation (in relation to the adjacent "two large tracts of undisturbed BLM land") and provide contiguous habitat quality. The proposed Snowy River project area consists of 100,600 acres of mostly contiguous BLM land that is overall relatively unfragmented and provides high quality wildlife habitat. However, if the Snowy River project is approved then habitat fragmentation and degradation will occur on BLM land though the establishment of access roads, well pads, pump stations, and powerlines. Therefore, there would be no assurance that a project with similar impacts could not occur on the two large tracts of undisturbed BLM land near the LO Ranch, and this apparent lack of protection on adjacent BLM land reduces the potential positive impact of the LO Ranch easement (i.e., perceived reduction of habitat fragmentation at the landscape scale).	The Project would be completed in accordance with the Montana EO 12-2015 (EO 12-2015), which requires that all new land uses or activities that are subject to state agency review, approval, or authorization complete appropriate planning and siting sequencing to avoid, minimize, and reclaim project impacts and then to compensate/mitigate for the loss of sage-grouse habitat as appropriate. Review by the State of Montana includes the DDCT and the HQT. The Montana DDCT was used to quantify the existing conditions and the net proposed difference as a result of a project. The HQT measures the quantity and quality of habitat at a site for sage-grouse in terms of Functional Acres. Functional Acres serve as the basis of the currency of the Montana Mitigation System: credits and debits. Functional Acres account for the quantity and quality of the habitat at multiple spatial scales and temporal intervals. A common currency allows for standardization in the calculation of credits and debits, which affords the opportunity to conduct mitigation consistently across projects, land ownership, and jurisdictional boundaries. For additional details on development of the Montana EO 12-2015 visit https://fwp.mt.gov/binaries/content/assets/fwp/conservation/wildlife-reports/sage-grouse/eo_12_2015_sage_grouse.pdf. The Montana HQT was completed for the proposed Project and the three conservation easements to determine debits and credits, respectively. The Project has been sited in areas of existing disturbance (collocated) to avoid new disturbance in higher quality greater sage-grouse habitat (see Figure 6 in EA Appendix D). EA Section 3.5 was updated to include clarification on the Montana HQT and its application to this Project. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP. EA Section 3.6.2 has been updated to consider that any future surface disturbing or disruptive activities proposed on BLM lands would be reviewed as a separate NEPA analysis in accordance with the 2015 MCFO RMP, as amended. For this analysis, the BLM took into consideration that a conservation easement may afford certain protection measures that would not be imposed without the conservation easement on privately owned lands. The easements may compliment and possibly augment BLM sage-grouse RMP decisions and mitigation measures, along with Montana EO 12-2015 requirements (includes multipliers for net gain). Therefore, at a landscape scale, when measures are considered together, there would likely be a cumulative net conservation gain to the habitat by augmenting protection to sage-grouse habitat as a whole. Additional analysis has been added assessing PHMA (core) and GHMA contributions to meeting GRSG goals and objectives.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
493	Brad Schmitz; Montana Fish, Wildlife & Parks Region 7	While it is likely unable to occur in time for the Snowy River Project, FWP urges the BLM to consider adjusting or creating policies for stipulations related to Carbon Capture Use and Storage (CCUS) projects on BLM lands. The Draft Programmatic EIS for the BLM Western Solar Plan omits certain BLM lands for solar development due to factors such as critical habitat. In all five proposed alternatives, as well as the No Action alternative, solar development would (likely) not be allowed within the Snowy River project area. Regarding oil and gas leases, the BLM Miles City Field Office has stipulation NSO 11-79: No Surface Occupancy in Sage Grouse Priority Habitat Areas. Therefore, a proposed oil or gas lease within the Snowy River project area would be denied (with very strict exceptions) because it is within the Carter County Sage Grouse Priority Protection Area. However, similar protection for critical sage grouse habitat does not currently exist for CCUS projects. This is despite the fact that many of the same negative impacts to habitat for sage grouse and other wildlife would occur for each of the development categories, such as habitat loss and fragmentation, increased traffic and noise, etc. FWP urges the BLM to create similar stipulations for CCUS projects as already exist for oil and gas leasing, or to add CCUS projects into the existing stipulations for oil and gas leasing, especially given the similarity of surface impacts for both types of development.	Developing stipulations or policies for Carbon Capture Use and Storage or compliance with the BLM Draft Programmatic EIS for the BLM Western Solar Plan are outside the scope of this analysis. As stated in EA Section 1.4, the proposed ROWs are in accordance with the decisions contained in the 2015 MCFO ROD and approved RMP which states PHMAs are listed as avoidance areas for major and minor ROWs (Management Decision 3 on pages 2-9 and 2-10) and not "exclusion areas" (i.e., ROWs prohibited). Chapter 6 of the 2015 MCFO RMP defines avoidance areas as "Areas with sensitive resource values in which ROWs and surface disturbing and disruptive activities would be strongly discouraged. ROW avoidance areas are to be avoided but may be available for location of ROWs with special stipulations / mitigation." Although the proposed action would be in a PHMA, this proposed action is in compliance with BLM sage-grouse management decisions based on Denbury's implementation of avoidance measures and adherence to stipulations and mitigation requirements. EA Section 1.5 states the BLM ROWs are processed in accordance with FLPMA and the 2015 MCFO RMP. They are subject to the terms and conditions in 43 CFR Part 2800, NEPA determined stipulations, and measures set forth in the POD. Therefore, application of oil and gas stipulations would not apply to FLPMA ROWs. Moreover, they are also contingent on numerous federal, state, and local permits, which include an EPA UIC Class VI permit for drilling and use of the well to inject CO2 into the underground pore space. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project compares to CBNG and O&G projects. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and BLM to offset remaining impacts to sage-grouse habitat using perpetual conservation easements.

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494	Wyckoff, Christy	If the land currently has species-specific protections according to BLM NSO 11-79 then the sage grouse is the "conservation value at risk". The protections of sage grouse as outlined in BLM NSO 11-79 explicitly prohibit "surface occupation". The activities of oil and gas development have been previously identified as impactful to the species and as such are prohibited by the BLM on this parcel. While "oil and gas" may be specifically called out in some background documents, it is not the resource but the processes involved (access infrastructure, development of the well and associated long-term activities like lights and traffic) that are the causal agents of impact to the habitat (surface) and the sage grouse (species at risk). All of these factors remain the same whether the subject resource (liquid CO2 in this case) is being extracted or deposited. Additionally, the technologies used and contractors hired to develop and utilize these sequestration wells are all equipment, technology and jobs developed for the oil and gas industry, suggesting the inextricable relationship between the two and the similar footprint of impact. If the activity of developing any type of well and associated access infrastructure would have surface occupation and, as such, impacts on the species or conservation value at risk then it is incompatible with the existing protections that are in place. The intent of the NSO 11-79 is to prevent surface occupation that would impact sage grouse, this would include any activities that would be materially similar to other resource extraction activities. If allowed to proceed, the BLM will be in violation of it's own protective standards and working against the intent and spirit of those standards. It seems like a lawsuit in the making. It would be best for the BLM to reconsider this project and consolidate the surface occupation activities associated with CO2 sequestration wells to areas that have already been subject to oil and gas development. Why spread out the destruction?	As stated in EA Section 1.4, the proposed ROWs are in accordance with the decisions contained in the 2015 MCFO ROD and approved RMP which states PHMAs are listed as avoidance areas for major and minor ROWs (Management Decision 3 on pages 2-9 and 2-10) and not "exclusion areas" (i.e., ROWs prohibited). Chapter 6 of the 2015 MCFO RMP defines avoidance areas as "Areas with sensitive resource values in which ROWs and surface disturbing and disruptive activities would be strongly discouraged. ROW avoidance areas are to be avoided but may be available for location of ROWs with special stipulations / mitigation." Although the proposed action would be in a PHMA, this proposed action is in compliance with BLM sage-grouse management decisions based on Denbury's implementation of avoidance measures and adherence to stipulations and mitigation requirements. EA Section 1.5 states the BLM ROWs are processed in accordance with FLPMA and the 2015 MCFO RMP. They are subject to the terms and conditions in 43 CFR Part 2800, stipulations specified, and measures set forth in the POD. Therefore, application of oil and gas stipulations would not apply to FLPMA ROWs. Moreover, they are also contingent on numerous federal, state, and local permits, which include an EPA UIC Class VI permit for drilling and use of the well to inject CO2 into the underground pore space. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project compares to CBNG and O&G projects. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and BLM to offset remaining impacts to sage-grouse habitat using perpetual conservation easements.

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495	Carroll, Llane; Harmon Creek Cattle LLC	The EA promotes alternative two as a net positive for sage grouse as a result of obtaining conservation easements on the LO and Ringling ranches. These conservation easements have already been obtained and therefore implementing alternative two will not improve sage grouse habitat. Within the text of the EA's content, alternative two will result in a number of adverse implications for the sage grouse population within the POD. Noise from pumping stations and increased vehicle traffic will disrupt all phases of sage grouse life cycles. An increase in elevated structures will increase perceived predation threats to sage grouse resulting in changes in lek activity.	As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. Denbury would also implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements. In its letter dated September 11, 2023, the Program concluded that the proposed activities that are presented in Denbury's Greater Sage-Grouse Mitigation Plan (POD Appendix I), including the use of compensatory mitigation credits, are consistent with the Montana Sage Grouse Conservation Strategy. The BLM has considered and assessed the Program analysis in the EA. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and BLM to offset remaining impacts to sage-grouse habitat using perpetual conservation easements. For this analysis the BLM took into consideration that a conservation easement may afford certain protection measures that would not be imposed without the conservation easement on privately owned lands. The easements may compliment and possibly augment BLM sage-grouse RMP decisions and mitigation measures, along with Montana EO 12-2015 requirements (includes multipliers for net gain). Therefore, at a landscape scale, when measures are considered together, there would likely be a cumulative net conservation gain to the habitat by augmenting protection to sage-grouse habitat as a whole. Additional analysis has been added assessing PHMA (core) and GHMA contributions to meeting GRSG goals and objectives.

496	Montana Wildlife Federation	The poor analysis of the effects on the 17 Confirmed Active Sage-Grouse leks within the project area is disturbing. Located in a designated PHMA by the 2015 MCFO-approved RMP (described as lands with the highest value for sustaining sage-grouse) and designated by the State of Montana as Core Habitat, which is Montana's highest density of sage-grouse. The analysis writes off effects on sage-grouse with company-provided mitigation and Conservation Easements held south of the project area. Sadly, in the no-action alternative, the destructive influx of the noxious weed ventenata is identified to continue to spread, as the proponent's spray program would conclude if not permitted. It's sad to see that BLM cannot even meet their resource obligations in the Miles City Field Office, which puts in question the resources available to complete any monitoring, much less action to reduce noxious weeds and other impediments to high-value sage-grouse habitat and confirmed Active areas. The significant effect of these confirmed Active Sage-Grouse leks requires analysis in an EIS.	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. EA Section 3.6.2 has been updated to clarify that noxious and invasive weeds could be treated through federal, state, or county efforts; however, treatment of the invasive ventenata and other invasive species that degrade sage-grouse habitat may not occur or would occur on a much smaller scale. EA Section 3.6.1 was revised to clarify that approximately 120 acres of noxious weeds were mapped within the proposed ROWs, as presented in the Attachment A of the Noxious Weed Management Plan in POD Appendix J. In addition to the 120 acres mapped, the BLM identified several areas of previously-recorded ventenata infestations outside of the proposed disturbance footprint but inside the Project area. Denbury treated approximately 800 acres, 1,200 acres, and 1,145 acres of ventenata, in 2022, 2023, and 2024, respectively, which included acres within the proposed disturbance footprint and within the overall Project area. Denbury would continue to coordinate with the BLM to map and treat all noxious and invasive weeds annually in compliance with the BLM-approved Pesticide Use Permit. The EA analyzed sage grouse and its associated habitat. The Montana HQT was completed for the proposed Project and the three conservation easements to determine debits and credits, respectively. The Project has been collocated with existing disturbance to avoid new disturbance to higher quality greater sage-grouse habitat (see Figure 6 in EA Appendix D). EA Section was updated to include clarification on the Montana HQT and its application to this Project. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see EA Figure 3-3), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements. For this analysis the BLM took into consideration that a conservation easement may afford certain protection measures that

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
See Previous Page	*See Previous Page*	*See Previous Page*	would not be imposed without the conservation easement on privately owned lands. The easements may compliment and possibly augment BLM sage-grouse RMP decisions and mitigation measures, along with Montana EO 12-2015 requirements (includes multipliers for net gain). Therefore, at a landscape scale, when measures are considered together, there would likely be a cumulative net conservation gain to the habitat by augmenting protection to sage-grouse habitat as a whole. Additional analysis has been added assessing PHMA (core) and GHMA contributions to meeting GRSG goals and objectives. The BLM concluded that the Project's operational activities (i.e. above ground structures and vehicle traffic during lekking and severe winters) would add potential stressors to specific leks in the area by potentially modifying behavior and seasonal use. However, with the proposed BLM measures, applicant committed measures listed in EA Section 3.5.3. and POD Sections 4 and 5, and compliance with the Montana EO 12-2015 the magnitude of these existing and operational stressors from proposed action would be negligible. Even through the Project's operational activities, due to the Project's spatial and temporal scale would be further minimized as discussed in EA Section 3.5.3. More specifically, by limiting disruption or disturbance during lekking, winter, breeding, brood-rearing and potentially burying the future proposed power line, these stressors would drastically minimize avoidance by sage-grouse in the Project area.

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
497	Barbour, Liz; J Bar L Ranches	As a community, our collaboration with the land for our livelihood, growing our businesses and our families requires due diligence and and EIS for a project of this magnitude. Part of our mission is to steward our land and animals to the best of our ability, share what we are learning at the intersection of ranching and conservation and enhance understanding of conservation in wild spaces. BLM Stipulation NSO 11–79 protects this specific site from infrastructure development. Although it is tailored to the oil and gas industry, the over arching goal is to eliminate infrastructure development that would sabotage greater sage grouse habitat. There are sage grouse leks on this site, and on ranches surrounding this project site. Denbery may be paying for a conservation easement where the sage grouse can flee, however this is hush money as there are multiple sage grouse leks on other ranches surrounding this entire project. BLM states that the habitat in the specific area is declining. It is disappointing that instead of attempting to make reparations for Sage Grouse habitat the attitude is, "oh well, let's just run them out the rest of the way"; a direct contradiction to what was said to ranchers over the last decade about SG habitat. When droughts occurred in Carter county ranchers could not run pipeline across the top of the ground to extend water resources to livestock in that area as it would cause too much disturbance to SG habitat. The environmental assessment does not do justice to the effects this project will have on the Great SG population and habitat. Currently, BLM is hosting meetings on an ongoing EIS to update greater sage grouse populations on public lands across the west. Why are there sudden exceptions for big oil companies on this already protected site?	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. As stated in EA Section 1.4, the proposed ROWs are in accordance with the decisions contained in the 2015 MCFO ROD and approved RMP which states PHMAs are listed as avoidance areas for major and minor ROWs (Management Decision 3 on pages 2-9 and 2-10) and not "exclusion areas" (i.e., ROWs prohibited). Chapter 6 of the 2015 MCFO RMP defines avoidance areas as "Areas with sensitive resource values in which ROWs and surface disturbing and disruptive activities would be strongly discouraged. ROW avoidance areas are to be avoided but may be available for location of ROWs with special stipulations / mitigation." Although the proposed action would be in a PHMA, this proposed action is in compliance with BLM sage-grouse management decisions based on Denbury's implementation of avoidance measures and adherence to stipulations and mitigation requirements. EA Section 3.5.1 has also been revised to include additional context regarding the effects that severe winter weather and drought can have on sage-grouse mortality, which may have contributed to population declines in and around the Project area. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and BLM to offset remaining impacts to sage-grouse habitat using perpetual conservation easements.

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498	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	All "management authorizations and actions" on BLM lands must conform to the approved Resource Management Plan (RMP). While the Draft EA claims the Project conforms with the 2015 Miles City Field Office (MCFO) RMP, it mentions that this conformity is "based on Denbury's implementation of avoidance measures and adherence to stipulations and mitigation requirements" regarding Priority Habitat Management Areas (PHMAs) for the greater sage-grouse (GRSG). The Project's impacts to the GRSG, and thus, conformance to the RMP, is a significant issue. According to the Draft EA, "The entire Project area is designated as a PHMA for greater sage-grouse by the 2015 MCFO approved RMP." PHMAs are "lands that have the highest value for sustaining sage-grouse populations." The State of Montana designated the Project area "as Core Habitat which is defined as Montana's highest densities of sage-grouse (25 percent quartile), based on male counts and/or sage-grouse lek complexes and associated habitat important to sage-grouse distribution." There are 17 "confirmed active leks" within the Project area and a 3.1-mile buffer surrounding the Project, as well as 16 leks with other statuses. Alarmingly, the Project area's GRSG are declining at a faster rate than neighboring populations.	The EA analyzed sage grouse and its associated habitat. The Montana HQT was completed for the proposed Project and the three conservation easements to determine debits and credits, respectively. The Project has been collocated in existing disturbance to avoid new disturbance in higher quality greater sage-grouse habitat (see Figure 6 in EA Appendix D). EA Section was updated to include clarification on the Montana HQT and its application to this Project. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements. EA Section 3.5.1 has also been revised to include additional context regarding the effects that severe winter weather and drought can have on sage-grouse mortality, which may have contributed to population declines in and around the Project area. For this analysis the BLM took into consideration that a conservation easement may afford certain protection measures that would not be imposed without the conservation easement on privately owned lands. The easements may compliment and possibly augment BLM sage-grouse RMP decisions and mitigation measures, along with Montana EO 12-2015 requirements (includes multipliers for net gain). Therefore, at a landscape scale, when measures are considered together, there would likely be a cumulative net conservation gain to the habitat by augmenting protection to sage-grouse habitat as a whole. Additional analysis has been added assessing PHMA (core) and GHMA contributions to meeting GRSG goals and objectives. The BLM concluded that the Project's operational activities (i.e., above ground structures and vehicle traffic during lekking and severe winters) would add potential stressors to specific leks in the area by potentially modifying behavior and seasonal use. However, with the proposed BLM measures, applicant committed measures listed in EA Section 3.5.3. and POD Sections 4 and 5, and compliance with the Montana EO 12-2015 the magnitude of these existing and operational stressors from proposed action would be negligible. Even through the Project's operational activities, due to the Project's spatial and temporal scale would be further minimized as discussed in EA Section 3.5.3. More specifically, by limiting disruption or disturbance during lekking, winter, breeding, brood-rearing and potentially burying the future proposed power line, these stressors would drastically minimize avoidance by sage-grouse in the Project area. EA Section 1.4 was revised to provide additional clarification regarding the BLM's formal adoption of the State's approach to analyzing disturbance to sage-grouse habitat in a maintenance action of the land use plan on July 30, 2018. Although the proposed action would be in a PHMA, the Project is in compliance with BLM sage-grouse goals, objectives, and management decisions based on Denbury's implementation of avoidance measures, adherence to stipulations and mitigation requirements, and compliance with the EO 12-2015 surface disturbance 5% limit deviation through compensatory mitigation that does not contribute to declines in sage-grouse populations. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP.

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499	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM offers no evidence that either the "applicant-committed resource protections" or the BLM-required "additional mitigation measures" will be effective in reducing harms to GRSG and their habitat. BLM also fails to address whether the "applicant-committed" measures are enforceable in any way; it does not appear so. The Project's impacts to GRSG and their habitat not only implicate RMP compliance, but also compliance with NEPA (for being a significant impact warranting an EIS) and the ESA (as described later in this comment letter).	Section 7 of the BLM ROW SF-299 application requires a project description, which may be submitted in a POD. As part of the ROW grant, if issued, stipulate that the ROW is subject to the terms and conditions in 43 CFR Part 2800, the terms and conditions/stipulations, design features and/or mitigations set forth in the application, POD, and the grant. Furthermore, EA Section 1.5 states that the ROW grant would be subject to terms and conditions in 43 CFR Part 2800, the terms and conditions and stipulations specified, and mitigations set forth in the application and POD. Therefore, all applicant committed measures and design features in the POD are enforceable by BLM through the ROW grant. The greater sage-grouse is not federally protected under the ESA; therefore, it was not included in the discussion of federally listed threatened and endangered species. The BLM coordinated with USFWS as disclosed in EA Section 4. The BLM considered BLM sensitive status species listed in BLM IM-2020-012 and followed Manual 6840 which directs the promotion of conservation and reduction of the likelihood and need for future listing under the ESA for species requiring special management consideration. See EA Section 3.5 for analysis on sage grouse. Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact.
500	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	With regard to Denbury's proposed mitigations, one such measure is through off-site conservation easements located outside the Project Area in Carter County. The Draft EA summarizes this measure as such (emphases added): Denbury proposes to secure mitigation credits through the implementation of conservation easements at three locations in Carter County: the LO Ranch, Ringling Ranch II, and Ringling Ranch III. These ranches are part of different sage-grouse clusters or populations in the TAWS, which include south Carter County and northeast Wyoming; therefore, the easements are not anticipated to provide use directly to the sage-grouse population found in the Project area. Although the sagegrouse population has declined for the populations at the LO Ranch, Ringling Ranch II, and Ringling Ranch III, they are not as severe as the population declines in the Project area. Most conservation easements allow existing uses—such as grazing, fencing, irrigation, and hunting—to continue; there is no evidence in the record that the conservation easements Denbury is proposing would help halt the decline of of the GRSG in those tracts or at large; similarly, there is no evidence that those conservation easements will do anything beneficial for the GRSG at all. BLM also does not explain whether the conservation easement tracts and the existing activities on those properties adhere to, or otherwise violate, the recommended 3.1-mile buffer for surface disturbances, linear features, and energy development meant to limit harms to GRSG.	The BLM has formally adopted and implemented the state's approach to analyzing disturbance as outlined in EO 12-2015 Attachments D (Stipulations for Uses and Activities) and H (Definitions). The Program completed an HQT analysis for the Project and three compensatory mitigation sites. EA Section 3.5.1 was revised to include additional context on the Program's GIS-based HQT that consists of a three-level assessment to quantify the loss or gain of habitat function over the life of development and conservation projects. For conservation projects, credits are created through preservation, restoration, enhancement, and/or permittee-responsible mitigation projects, and are based on the functional acres gained or preserved. This function-based approach, in which debits and mitigation credits relate directly to the quality of the affected habitat function, standardizes the accounting of habitat gains and losses. Compensatory mitigation for habitat loss is not based solely on the affected acreage, but the quality of the affected habitat. Additional information about the HQT is published in the *Montana Mitigation System Habitat Quantification Tool Technical Manual for Greater Sage-Grouse* available at https://sagegrouse.mt.gov/documents/HabitatQuantificationToolTechnicalManualv1.1. In its letter dated September 11, 2023, the Program concluded that the proposed activities that are presented in Denbury's Greater Sage-Grouse Mitigation Plan (POD Appendix I), including the use of compensatory mitigation credits, are consistent with the Montana Sage Grouse Conservation Strategy. The EA analyzed sage grouse and its associated habitat. The Montana HQT was completed for the proposed Project and the three conservation easements to determine debits and credits, respectively. The Project has been collocated with existing disturbance to avoid new disturbance to higher quality greater sage-grouse habitat (see Figure 6 in EA Appendix D). EA Section was updated to include clarification on the Montana HQT and its application to this Project. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. EA Section 3.6.2 has been updated to consider that any future surface disturbing or disruptive activities proposed on BLM lands would be reviewed as a separate NEPA analysis in accordance with the 2015 MCFO RMP, as amended.

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501	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM also failed with regard to the following: • BLM offers no evidence that where the Project fragments habitat and degrades new areas, "[r]eclamation activities" would somehow be effective; and • While BLM notes in the context of powerlines that GRSG avoid "tall structures on the landscape regardless of actual use by raptors," the agency fails to assess GRSG impacts from avoiding tall structures like injection wells.	EA Section 3.5.2 notes that large portions of the proposed action would occur along existing roads and ROWs, thus minimizing habitat fragmentation. Eighty-nine percent (35 miles) of the bulklines and flowlines would be co-located with existing or proposed permanent access roads. The Project would use approximately 14 miles of existing developed roads (Lone Tree Road and Ridge Road) and 25 miles of existing two-tracks on BLM-administered lands. Approximately 5 miles of new two-tracks (4 miles on BLM lands) would be created throughout the Project area to access well pads and pump stations. Where the proposed action would be constructed in new areas, temporary habitat fragmentation and degradation would occur. Committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan include reclamation activities and noxious weed treatment to minimize habitat impacts. In USGS Report "Conservation Buffer Distance Estimates for Greater Sage-Grouse - A Review", Manier et. al state that the tall structure category "contains a wide array of infrastructure including poles that support lights, telephone and electrical distribution, communication towers, meteorological towers, and high-tension transmission towers". They list examples of low structures as buildings and fences. For its analysis, the BLM therefore classified the electric transmission line as a "tall structure" and injection wells and pump stations as "low structures" as indicated in the column headings in EA Table 3-18.
502	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The 2015 MCFO RMP states that a "key component[]" of addressing threats to the GRSG is to "avoid[]" or "exclu[de]" energy development in priority and general habitat management areas as "avoidance" or "exclusion" areas, and in some cases prioritize such energy development "outside GRSG habitat." Clearly this is not happening with the Project, since the entire Project area is designated as a PHMA for GRSG. In the Draft EA, BLM offers no alternative other than a "No Action" alternative and the Proposed Action alternative. This violates the RMP by not putting forth effort to avoid or prioritize development outside of PHMAs. Finally, BLM is currently undergoing a process to rewrite and update the Miles City RMP. While BLM is obligated to take actions to make existing permits conform to an updated RMP, because the entire Project is within PHMAs and involves installing long-term and near permanent infrastructure, BLM should pause consideration of the Project until after the Miles City RMP update is finalized.	As stated in EA Section 1.4, the proposed ROWs are in accordance with the decisions contained in the 2015 MCFO ROD and approved RMP which states PHMAs are listed as avoidance areas for major and minor ROWs (Management Decision 3 on pages 2-9 and 2-10) and not "exclusion areas" (i.e., ROWs prohibited). Chapter 6 of the 2015 MCFO RMP defines avoidance areas as "Areas with sensitive resource values in which ROWs and surface disturbing and disruptive activities would be strongly discouraged. ROW avoidance areas are to be avoided but may be available for location of ROWs with special stipulations / mitigation." EA Section 1.4 was revised to provide additional clarification regarding the BLM's formal adoption of the State's approach to analyzing disturbance to sage-grouse habitat in a maintenance action of the land use plan on July 30, 2018. Although the proposed action would be in a PHMA, the Project is in compliance with BLM sage-grouse goals, objectives, and management decisions based on Denbury's implementation of avoidance measures, adherence to stipulations and mitigation requirements, and compliance with the EO 12-2015 surface disturbance 5% limit deviation through compensatory mitigation that does not contribute to declines in sage-grouse populations. The EA analyzed sage grouse and its associated habitat. The Montana HQT was completed for the proposed Project and the three conservation easements to determine debits and credits, respectively. The Project has been collocated with existing disturbance to avoid new disturbance to higher quality greater sage-grouse habitat (see Figure 6 in EA Appendix D). EA Section was updated to include clarification on the Montana HQT and its application to this Project. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. This addition includes additional information (in section 2.2) indicating why the project location is limited to being in PHMA.

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503	Individual	The project area is core sage grouse habitat – the current minimal disruption by human and vehicle traffic being a driving factor for their success in the area. With the implementation of a project of this nature, the abundance of natural habitat for sage grouse, and other wildlife, will no longer be intact. Decades of work have gone into restoring and promoting the sage grouse population in the state, inserting human influence into an area that has been protected is extremely counterproductive. We want to emphasize the fact that the EIS clearly states that the entire project acreage has been designated as sage grouse Core Habitat, habitat that will be severely disrupted. Furthermore 30,176 acres of critical winter range are within the project area, as are 17 confirmed active leks (Section 3.5 Sage-Grouse Habitat Description). It's important to note that under Alternative 2, the Raw HQT calculated for this project, expects 89,400 functional acres to be lost. The fact that this is understood by the agency and Denburry, and the project is still being pushed forward illustrates how little the agency truly cares about the species. It is extremely ironic that at the same time that this project is in the works, the Sage Grouse Management Plan was released with an alternative that proposes to remove all grazing, mining, or energy work from areas that may include sage grouse habitat. BLM and Denburry have stated intent to purchase sage grouse credits from LO Ranch and Ringling ranches via perpetual conservation easement, in order to promote contiguous sage grouse habitat. While this sounds nice in theory, it is not a legitimate mitigation strategy. Clearly stated in Section 3.5.3 Cumulative Effects, purchasing credits on other property does not bring back the sage grouse habitat destroyed, or add additional habitat for the displaced sage grouse. It is simply paying for sage grouse that already exist, a tool for manipulating public perception of the project. Over 100,000 acres of sage grouse habitat will still be disrupted, 89,400 functional acres lost, birds will be displaced, and the work of true land stewards will be absolutely destroyed. Because of these statistics it is absolutely illogical to conclude a net positive effect to sage grouse when the only change is money changing hands.	The BLM has formally adopted and implemented the state's approach to analyzing disturbance as outlined in EO 12-2015 Attachments D (Stipulations for Uses and Activities) and H (Definitions). The Program completed an HQT analysis for the Project and three compensatory mitigation sites. EA Section 3.5.1 was revised to include additional context on the Program's GIS-based HQT that consists of a three-level assessment to quantify the loss or gain of habitat function over the life of development and conservation projects. For conservation projects, credits are created through preservation, restoration, enhancement, and/or permittee-responsible mitigation projects, and are based on the functional acres gained or preserved. This function-based approach, in which debits and mitigation credits relate directly to the quality of the affected habitat function, standardizes the accounting of habitat gains and losses. Compensatory mitigation for habitat loss is not based solely on the affected acreage, but the quality of the affected habitat. Additional information about the HQT is published in the *Montana Mitigation System Habitat Quantification Tool Technical Manual for Greater Sage-Grouse* available at https://sagegrouse.mt.gov/documents/HabitatQuantificationToolTechnicalManualv1.1. In its letter dated September 11, 2023, the Program concluded that the proposed activities that are presented in Denbury's Greater Sage-Grouse Mitigation Plan (POD Appendix I), including the use of compensatory mitigation credits, are consistent with the Montana Sage Grouse Conservation Strategy. The EA analyzed sage grouse and its associated habitat. The Montana HQT was completed for the proposed Project and the three conservation easements to determine debits and credits, respectively. The Project has been collocated with existing disturbance to avoid new disturbance to higher quality greater sage-grouse habitat (see Figure 6 in EA Appendix D). EA Section was updated to include clarification on the Montana HQT and its application to this Project. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. This addition includes additional information (in section 2.2) indicating why the project location is limited to being in PHMA Under Alternative 2, if ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. EA Section 3.5.1 has also been revised to include additional context regarding the effects that severe winter weather and drought can have on sage-grouse mortality, which may have contributed to population declines in and around the Project area.

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504	O'Grady, Morgan; Western Environmental Law Center et al.	BLM has not adequately analyzed the proposed Project's compliance with the Miles City Resource Management Plan Amendment (RMP) with regards to greater sage-grouse. The proposed Project would be located within Priority Habitat Management Area (PHMA), and in an area in which greater-sage grouse populations are declining more rapidly than in neighboring areas. Moreover, the Miles City RMP "strongly discourage[s]" granting of major or minor ROWs in avoidance areas—which include PHMAs. Nonetheless, BLM suggests that Denbury's use of avoidance measures and adherence to stipulations and mitigation requirements would be sufficient to warrant granting the ROW. BLM does not adequately address how the mitigation measures proposed for this Project clear the Miles City RMP's high hurdle to development in PHMAs.	As stated in EA Section 1.4, the proposed ROWs are in accordance with the decisions contained in the 2015 MCFO ROD and approved RMP which states PHMAs are listed as avoidance areas for major and minor ROWs (Management Decision 3 on pages 2-9 and 2-10) and not "exclusion areas" (i.e., ROWs prohibited). Chapter 6 of the 2015 MCFO RMP defines avoidance areas as "Areas with sensitive resource values in which ROWs and surface disturbing and disruptive activities would be strongly discouraged. ROW avoidance areas are to be avoided but may be available for location of ROWs with special stipulations / mitigation.." EA Section 1.4 was revised to provide additional clarification regarding the BLM's formal adoption of the State's approach to analyzing disturbance to sage-grouse habitat in a maintenance action of the land use plan on July 30, 2018. Although the proposed action would be in a PHMA, the Project is in compliance with BLM sage-grouse goals, objectives, and management decisions based on Denbury's implementation of avoidance measures, adherence to stipulations and mitigation requirements, and compliance with the EO 12-2015 surface disturbance 5% limit deviation through compensatory mitigation that does not contribute to declines in sage-grouse populations. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect, and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. The EA analyzed sage grouse and its associated habitat. The Montana HQT was completed for the proposed Project and the three conservation easements to determine debits and credits, respectively. The Project has been collocated with existing disturbance to avoid new disturbance to higher quality greater sage-grouse habitat (see Figure 6 in EA Appendix D). EA Section was updated to include clarification on the Montana HQT and its application to this Project. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and BLM to offset remaining impacts to sage-grouse habitat using perpetual conservation easements.

505	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM must also fully disclose and analyze the Project's impacts on federally-listed species, such as the greater sage-grouse (GRSG). The entire Project area is within GRSG Priority Habitat Management Areas (PHMAs), and Denbury's surveys located significant sagegrouse activity in the region. This species receives protection from Montana EO 12-2015, as well as from BLM's own resource management plans (RMPs). As we explain in section VII of this comment letter, infra, BLM fails to analyze the Project's impacts on the GRSG in a way that violates the RMP, NEPA, and the ESA. Even at this early stage, it is already clear from Denbury's own documentation that the Project will significantly damage or impair habits which are vital to the life history and continued existence and recovery of the GRSG. Denbury projects there to be as many as 40 leks within the area of interest surrounding the project. Unfortunately, Denbury's findings are largely unverifiable because the exact locations of these leks have been redacted from the text of the report. While this redaction may serve a valid conservation purpose, BLM should ensure that it can independently confirm the status of the leks. Multiple leks are within very short distances of the construction area; at least one may be within 0.00 miles of the 0.6-mile no surface occupancy buffer and a proposed project ROW. The 2015 Miles City Field Office RMP already announced that it was BLM's policy to avoid "major ROWs" within the species' habitat, and to either avoid "minor ROWs" entirely or allow them only "with design features." In BLM's own words, "managing for healthy and resilient sagebrush habitat is considered essential to the long-term health of GRSG populations that continue to experience pressure from a variety of factors, including invasive grasses, wildfire, drought exacerbated by climate change, and development." In light of this, the prudent choice for BLM would be to deny the requested ROW applications. If, however, BLM decides to consider granting them, BLM must consider various design features which would minimize the effect of these ROWs. In particular, BLM should explore strategies to ensure that the species retains extensive sagebrush landscapes capable of supporting a robust population during all seasons and to protect vital breeding habitats. These strategies could include buffers, a surface-disturbance cap, seasonal restrictions, and noise restrictions.	The greater sage-grouse is not federally protected under the ESA; therefore, it was not included in the discussion of federally listed threatened and endangered species. The BLM coordinated with USFWS as disclosed in EA Section 4. The BLM considered BLM sensitive status species listed in BLM IM-2020-012 and followed Manual 6840 which directs the promotion of conservation and reduction of the likelihood and need for future listing under the ESA for species requiring special management consideration. See EA Section 3.5 for analysis on sage grouse. Denbury sage-grouse lek surveys were conducted in accordance with BLM survey requirements. Survey results were reviewed by BLM and incorporated into the MTFWP sage-grouse database. Lek locations are part of MTFWP data and are considered confidential and thus redacted on publicly available documents. The Project involves year-round operational activities that result in deviations from EO 12-2015: the Project's DDCT above 5% (0.16% above the existing 9.52% of agricultural disturbance) and year-round operational activities. Although the proposed action would be in a PHMA, this proposed action is in compliance with BLM sage-grouse goals, objectives, and management decisions based on Denbury's implementation of avoidance measures, adherence to stipulations and mitigation requirements, and compliance with the EO 12-2015 surface disturbance 5% limit deviation through compensatory mitigation that would not contribute to declines in sage--grouse population. See EA Section 1.4 for additional details on land use plan conformance for sage-grouse. The EA analyzed sage grouse and its associated habitat. The Montana HQT was completed for the proposed Project and the three conservation easements to determine debits and credits, respectively. The Project has been collocated with existing disturbance to avoid new disturbance to higher quality greater sage-grouse habitat (see Figure 6 in EA Appendix D). EA Section was updated to include clarification on the Montana HQT and its application to this Project. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. This addition includes additional information (in section 2.2) indicating why the project location is limited to being in PHMA. As disclosed in EA Section 3.5, existing impacts from agricultural lands would be ongoing. The Program deviation policy multipliers (i.e. reserve account multiplier, net gain, Core/PHMA area operational; use during March 15- July 15) were applied, consistent with EO 12-2015, to ensure that mitigation is timely and effective throughout the life of the Project. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. The Project is designed to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. Only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Therefore, the BLM does not anticipate that short or long-term disturbances from the project would result in changes to land health standards or other vegetation resource objectives, The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also

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See Previous Page	*See Previous Page*	*See Previous Page*	implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements.
506	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM must also analyze the impacts to GRSG and its habitat from invasive plants. Denbury identified a risk that the project will further the spread of invasive grass species in the area. The proposed project area has four already located infestations of Ventana grasses and "[t]hree small populations of Canada thistle." Management of the invasive Ventana grasses is priority for BLM. Importantly, concerned local citizens have also voiced a particular concern about the projects' capacity to spread noxious weeds, presumably in light of the effect such a spread would have on agriculture and grazing in the area.	As noted in Section 1.7.4 of the EA, Denbury has prepared a comprehensive Noxious Weed Management Plan (POD Appendix J) that meets the 2015 MCFO RMP objectives to prevent the expansion or eliminate the occurrence of invasive, non-native, or noxious weed species within the proposed ROWs. Section 5.10 and Ventenata Survey Report Appendix U in POD discusses the noxious weed inventory, mapping, and control efforts conducted by Denbury. EA Section 3.5.1 was revised to clarify that approximately 120 acres of noxious weeds were mapped within the proposed ROWs, as presented in the Attachment A of the Noxious Weed Management Plan in POD Appendix J. In addition to the 120 acres mapped, the BLM identified several areas of previously-recorded ventenata infestations outside of the proposed disturbance footprint but inside the Project area. Denbury treated approximately 800 acres, 1,200 acres, and 1,145 acres of ventenata, in 2022, 2023, and 2024, respectively, which included acres within the proposed disturbance footprint and within the overall Project area. Denbury would continue to coordinate with the BLM to map and treat all noxious and invasive weeds annually in compliance with the BLM-approved Pesticide Use Permit.
507	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Finally, in so far as this Project facilitates increased consumption of fossil-fuels and thereby worsens the climate crisis, BLM should consider the ways that global warming will degrade the habitat in the Project area. For example, since the survival of the GRSG depends in large part on the preservation and persistence of wide-open sagebrush plains that are increasingly threatened by climate change, wildfires and the spread of invasive plants, BLM must evaluate how the proposed Project would affect species' survival.	Analysis to determine the merits or deficiencies of CCUS is outside the scope of this EA. The BLM analyzed impacts to air resources and greenhouse gas emissions, which are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Factoring in the estimated 150 million tons of CO2 that would be sequestered, the Project would result in net GHG emissions of -149,969,153 tons of CO_2e over the life of the Project. EA Sections 1.7.3 and 1.7.5 address vegetation and soil impacts, which are anticipated to be short-term due to phased development and prompt reclamation practices. Pipeline ROWs and temporary workspace would be restored upon the completion of construction of each Project element in accordance with Denbury's Reclamation, Mitigation, and Monitoring Plan (POD Appendix G). EA Section 1.7.3 has been revised to clarify that only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Therefore, the BLM does not anticipate that short or long-term disturbances would result in changes to land health standards or other vegetation resource objectives, and thus would not be affected to a degree that detailed analyses is warranted. EA Section 3.5.1 describes existing sage grouse habitat condition, and Section 3.5.3 describes impacts to sage grouse habitats from the proposed action which, at a landscape level, would be a net conservation gain to sage-grouse species (population and habitat) as result of the conservation easements, compliance with EO 12-2015, and Denbury committed measures and design features.

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508	Cox, Julie	I am opposed to the projected Snowy River CO2 Sequestration Project in Carbon County, MT. Though the underlying sentiment of mitigating climate change seems noble, the detrimental effects of this project's implementation would outweigh the benefits it would deliver in its lifetime. The large-scale disruption to critical sage grouse habitat from this project is not worth the minimal CO2 sequestration return it will provide. While 150 million tons of carbon sequestration does seem like it would be a lot, BLM literature states that this is only equivalent to the number of emissions as from 1.6 million cars in one year's time. This amount of sequestration would take 20 years to achieve under the proposed project. According to the Journal of Consumer Research, there were 255 million drivers on the road in 2022 in the U.S. alone. Over the course of 20 years, offsetting the emissions of one year's worth of emissions from 1.6 million cars would be negligible compared to the 20 years' worth of emissions from 255 million cars. The loss of crucial sage grouse habitat would not be worth the minimal 20-year returns.	EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements.
509	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM must complete consultation with FWS on impacts to the GRSG. There is significant evidence in the Draft EA from both BLM and the applicant itself that its proposed Project crosses the low "may affect" threshold triggering ESA consultation requirements. For example, both BLM and Denbury acknowledge that the proposed project will be sited entirely in GRSG PHMA. As described earlier in this comment letter, BLM uncritically accepts proposed "avoidance measures" and "mitigation requirements" submitted by the project proponent as adequate to alleviate impacts to designated critical habitat, without obtaining input from the FWS or otherwise providing or examining evidence that these measures will be effective. It is FWS's analysis of Denbury's potential mitigation and avoidance measures that is required under the ESA consultation process to determine whether the proposed Project " may affect" but is "not likely to adversely affect" protected species and habitat. BLM's note that "[a]lthough the proposed action would be in a PHMA [Priority Habitat Management Area], this proposed action is in compliance with BLM sage-grouse management decisions based on Denbury's implementation of avoidance measures and adherence to stipulations and mitigation requirements" does not absolve the agency from evaluating the impacts purportedly being mitigated, and does not satisfy the agency's statutory mandate to take a "hard look" at the impacts of the project on GRSG and its habitat. The project's impacts to priority habitat for this federally protected, imperiled species warrant thorough consideration in a full EIS.	The greater sage-grouse is not federally protected under the ESA; therefore, consultation with the USFWS regarding impacts to the species are not required. The BLM coordinated with USFWS as disclosed in EA Section 4. As discussed in EA Sections 1.4 and 3.5, the Project was evaluated for compliance with the 2015 MCFO RMP and Montana EO 12-2015. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. This addition includes additional information (in section 2.2) indicating why the project location is limited to being in PHMA. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements.

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510	Individual	Producers in the proposed areas take land health very seriously and manage resources for healthy soils and clean water. As land stewards, ranchers work hard to keep the location an excellent habitat for wildlife, knowing that wildlife and livestock have a mutually beneficial relationship when all are managed correctly. With the information provided by the BLM, MSGA, MPLC, and MASGD does not believe that the BLM has taken into account the potential environmental degradation caused by this project. Not only will the work producers have done be destroyed, but there are also long-term environmental implications that have the potential to affect grazing and general land health permanently. With projected impacts as expansive as these, the need for a complete EIS process is evident. Furthermore, multiple facets of the project process were deeply flawed and entirely illogical. It is unnecessary, and unwise, to choose a productive area, and valuable sage grouse habitat, to implement this project. The negative effects to the future of the local communities, economy, livestock industry, and landscape are far reaching. With this in mind, our organizations strongly encourage BLM to no longer consider the implementation of this carbon storage project in this area and take the no action alternative We thank you for the opportunity to provide comments and continue to emphasize the importance of accurate calculations, full economic analysis, the destruction to overall land health, and the majorly detrimental impact this will have on the producers and communities in the surrounding areas.	Public access, permitted uses, and safety; Native American religious concerns; vegetation; wildlife and fisheries (except for sage grouse); and geological, paleontological, and soil resources were all considered in EA Section 1.7. Based on the applicant committed measures and Project design features (e.g. collocation with existing disturbances, no changes to existing ambient sound levels, no changes to BLM grazing permits, no changes in use of publicly accessible lands, timing restrictions, etc.) summarized in EA Section 1.7 and detailed in POD Sections 4 through 7, the BLM determined that these resources and resource uses, would not be affected to a degree that detailed analysis was warranted. EA Chapter 3 includes detailed analyses that were conducted for site-specific resource issues for air resources and greenhouse gas emissions, cultural resources, socioeconomics, and sage-grouse and sage-grouse habitat. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. Denbury would also implement compensatory mitigation as required by the Program and BLM to offset remaining impacts to sage-grouse habitat using perpetual conservation easements.
511	Lingle, Drew	The near threatened sage grouse may also benefit from the proposed project due to Denbury's acquisition of perpetual conservation easements and noxious weed treatments. Noxious weeds have spread at an unprecedented rate across MT, including in southeastern MT where sage grouse are found (Montana Sage Grouse Working Group 2005, v). Sage grouse populations are negatively impacted by noxious weeds impairing grassland habitat (Ibid.). By treating noxious weeds and expanding conservation areas, habitat for the sage grouse is likely to see some local population recovery.	EA Section 3.5.3 describes that noxious weed management and compensatory mitigation through the implementation of conservation easements are part of the mitigation strategy that Denbury would implement to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated.
512	Olson, Vicki	I have looked over this proposal and can't believe you are even considering it. I support the no action alt. If for no other reason the sage Grouse disrupt should make it a no brainer. Just because you buy easements doesn't mean the Grouse will like it or go there. It will be a major loss of a bird we have all tried so hard to protect. That alone should be enough to stop this project.	EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements.

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513	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	In its Draft EA, BLM identifies at least three federally protected species and/or designated critical habitat within the project area: GRSG (Centrocercus urophasianus), Dakota skipper butterfly (Hesperia dacotae), and northern long-eared bat (Myotis septentrionalis) (NLEB). Under the ESA, BLM must complete consultation with the Fish and Wildlife Service on potential impacts to each of these species and their protected habitat from the proposed Project. BLM has failed to complete this required task. First, in the section of the EA discussing the BLM's history of consultation with FWS for the proposed Project, BLM describes its consultation with the Service for only the Dakota skipper and NLEB. Such piecemeal consultation is inadequate and violates the ESA.	The MCFO interdisciplinary team considered the Montana Natural Heritage Program database, USFWS IPAC database, internal BLM data, staff expertise, and other information, as appropriate, to determine if special status species or associated habitats are known to occur or could occur in the Project area. As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan. The BLM determined that impacts to wildlife (except sage-grouse), fisheries, including special status species, and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. EA Section 4.2 was updated to clarify that the BLM coordinated with USFWS on the project, which did not include formal or informal consultation. Also, EA Section 4.2 discloses coordination with USFWS. Based on the May 4, 2022 letter, the USFWS indicated that additional efforts for protected butterfly species (Dakota skipper) would not be needed for the Project. However, for the NLEB, the BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on NLEB. As disclosed further in Section 4.2, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect the NLEB, other listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA. No effect means there will be no consequences to listed species or critical habitat that result from the proposed action, including the consequences of any activities that would not occur but for the proposed action. It is within the scope of the BLM's legal authority as the action agency to determine that the action has no effect, and section 7 consultation is thus not required. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. See EA Sections 1.7.4 and Section 4.2, and letter in POD Appendices M and N for additional details and surveys completed. The greater sage-grouse is not federally protected under the ESA; therefore, it was not included in the discussion of federally listed threatened and endangered species. The BLM coordinated with USFWS as disclosed in EA Section 4. The BLM considered BLM sensitive status species listed in BLM IM-2020-012 and followed Manual 6840 which directs the promotion of conservation and reduction of the likelihood and need for future listing under the ESA for species requiring special management consideration. See EA Section 3.5 for analysis on sage grouse.
514	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Second, the Draft EA notes that in "informal consultation," FWS confirmed to Denbury that at least one federally listed species, the NLEB, and one candidate species, the monarch butterfly, are within and/or have habitat within the Project area. The FWS also informed Denbury that the federally threatened Dakota skipper may be present within the Project area as a known population occurs within a few miles of the Montana border. However, the ESA requires BLM to complete consultation with FWS; any additional discussions between FWS and the project applicant are merely ancillary and do not themselves satisfy BLM's ESA consultation requirements. Even project applicant Denbury acknowledges that consultation with the FWS is a necessary step in the permitting process. Furthermore, styling the communications between FWS and Denbury as "informal consultation" merely pays lip service to the language of the ESA consultation process without actually complying with the statute. BLM must complete consultation under ESA Section 7 for all listed species that FWS determines may be present in the action area for the proposed project. Absent incidental take authorization obtained through the consultation process, Denbury is subject to the ESA's take prohibitions for these species if take occurs as a result of this Project.	50 CFR §402.13 does not require the BLM to consult with Fish and Wildlife Service if a no effect call is determined. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. The BLM did not consult, formally or informally, with FWS, but rather coordinated with them. EA Section 4.2 was updated to clarify the BLM coordinated with USFWS on the project, which did not include informal consultation.

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515	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Finally, given the broad definition of "action area" as all areas that would be "affected directly or indirectly by the Federal action and not merely the immediate area involved in the action," BLM must consider the whole of the Project's CCS activities in its consultation, such as CO2 transport, storage, injection, and underground CO2 plume spread. (While the underground plume spread is typically modeled in EPA's Class VI application process, meaning BLM could obtain this information from EPA, the agency must not advance the ROW application without obtaining this information for ESA purposes.)	As stated in EA Section 1.2, the purpose and need for the BLM is to respond to the SF-299 application submitted by Denbury to construct, operate, maintain, and terminate the following elements: access roads, well pads, bulklines, flowlines, pump stations and offices, and for use of federal underground pore space to sequester CO2 in Carter County, Montana. As noted in EA Section 1.0, under the SDWA, the EPA is the authorized federal agency tasked with protecting public health by regulating and overseeing the nation's public drinking water supplies, and not the BLM. Figure 3 in EA Appendix D shows the project sequence associated with BLM, EPA, and State of Montana. As noted in EA Section 4.2, the BLM has been in close coordination with EPA Region 8 staff regarding the BLM NEPA review process to ensure consideration of the EPA UIC permit requirements and permit review process. However, EPA UIC Class VI permit reviews are site specific well reviews, and are determined functionally equivalent to NEPA reviews and are thus exempt from NEPA review requirements, unless triggered by another statutory requirement (e.g., NHPA). Analysis of another agency's permitting action that has not been proposed/applied for yet (i.e., EPA UIC Class VI permit), and will be analyzed in detail by the permitting agency using current data, would be outside of BLM's jurisdiction. The BLM did, however, analyze the connected action of surface disturbance and associated emissions on State and private lands from issuing a BLM ROW. See EA Section 2.2 where tables include surface acres on State and private lands. EA Section 4.2 further states that because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect the NLEB, other listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA.
516	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Draft EA notes that BLM communicated with FWS about the Dakota skipper, noting that "additional efforts for protected butterfly species (e.g., Dakota skipper [Hesperia dacotae]) would not be needed for the Project in conjunction with ESA Section 7 informal consultation." However, to the extent that BLM relied on information about the Dakota skipper from project applicant Denbury, rather than undertaking its own surveys/analysis, its consultation with FWS may be inadequate and flawed. Moreover, just because Denbury carefully says it did not identify any "high quality" Dakota skipper habitat in the Project Area does not mean that there are no documented occurrences of the species within the project area. BLM must conduct its own investigation, use the best available science, and consider whether the species occurs not just at the injection sites, but along the whole of the Project. To the extent BLM uncritically accepts the project applicant's assertions about the species, any resultant consultation with FWS may be unlawful and flawed. BLM must evaluate the species' presence in the project area itself, and complete consultation with FWS accordingly.	EA Section 4.2 was updated to clarify the BLM coordinated with USFWS on the project, which did not include informal consultation. In its May 4, 2022 response letter, the USFWS stated that "While the threatened Dakota skipper (*Hesperia dacotaehas*) not been documented in Montana, it has been detected in North Dakota within a few miles of the Montana border. It is therefore conceivable that this species may be documented in Montana prior to or during Project construction." The USFWS recommended surveys be considered if high-quality mixed and tallgrass prairie habitat was present in the action area. The MCFO interdisciplinary team considered the Montana Natural Heritage Program database, USFWS IPAC database, internal BLM data, staff expertise, and other information, as appropriate, to determine if special status species or associated habitats are known to occur or could occur in the Project area. BLM specialist concurred based on their knowledge and expertise of the area that high-quality habitat was not identified within the ROWs for surface elements based, Dakota skipper surveys were not conducted.
517	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM must consult with FWS on impacts to NLEB and designated critical habitat that may result from the proposed Project. The NLEB prefers to roost in denser forests which, as Denbury's initial studies confirmed, are indeed present within the Project area. While Denbury states that "[t]he Project is not anticipated to remove any NLEB habitat," BLM is required to conduct its own analysis to determine whether the Project will remove NLEB habitat. Then, as part of the consultation process, FWS, the expert agency, is required to make its own independent conclusion.	The MCFO interdisciplinary team considered the Montana Natural Heritage Program database, USFWS IPAC database, internal BLM data, staff expertise, and other information, as appropriate, to determine if special status species or associated habitats are known to occur or could occur in the Project area. The USFWS has not designated Critical Habitat for the NLEB. BLM specialist concurred based on their knowledge and expertise of the area that no NLEB habitat will be removed. 50 CFR §402.13 does not require the BLM to consult with Fish and Wildlife Service if a no effect call is determined. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402.
518	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Similarly, Denbury also states that the FWS has already confirmed that the monarch butterfly, a candidate species, may be present in the project area. Despite this notice from the FWS, there is no indication that BLM or FWS have further assessed potential harms to the monarch butterfly from the Project. However, these communications between the project applicant and the FWS do not satisfy the BLM's obligation to complete consultation with the expert wildlife agency under ESA Section 7.	In December 2020, the USFWS determined that listing the monarch under the ESA is warranted but precluded at this time by higher priority listing actions. With this finding, the monarch butterfly became a candidate for listing. Neither section 7 of the ESA nor the implementing regulations for section 7 contain requirements for federal agencies with respect to candidate species. The USFWS can recommend ways to reduce adverse effects and/or request studies as appropriate. The USFWS's May 4, 2022 coordination response letter recommended appropriate measures to avoid and minimize impacts and enhance pollinator habitat where available. As disclosed in EA Sections 1.7.3 and 1.7.4, Denbury would avoid and further minimize impacts to vegetation and wildlife habitat. Reclamation would include reseeding with BLM-recommended native seed mixes that are based on site-specific ecological groups including Wyoming big sagebrush and other native plant species that provide critical habitat to wildlife. Noxious weed monitoring and treatment would enhance habitat reclamation.

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519	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	ESA consultation is not and should not be limited only to those species in the immediate project area. The impacts of the Project will undeniably go far beyond the footprint of the Project area and will affect climate-sensitive species and their habitat across the nation and the world. BLM itself acknowledges these climate impacts in its Draft EA. The Supreme Court has unequivocally stated that the Act's "language, history, and structure" made clear "beyond doubt" that "Congress intended endangered species to be afforded the highest of priorities" and endangered species should be given "priority over the 'primary missions' of federal agencies" especially during such consultations. Even with a global threat to biodiversity such as climate change, "the plain intent of Congress in enacting this statute was to halt and reverse the trend toward species extinction, whatever the cost." Because the proposed Project will have an appreciable, cumulative impact on climate-threatened species, BLM must also consult on the GHG impacts of the Project to listed species wherever they may be found. As detailed further below, the anticipated GHG pollution from the proposed Project will clearly harm listed species and protected habitat far beyond the immediate area of the proposed activity in a manner that is attributable to the proposed agency action. Formal consultation, therefore, is required.	The BLM analyzed impacts to air resources and greenhouse gas emissions, which are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Factoring in the estimated 150 million tons of CO2 that would be sequestered, the Project would result in net GHG emissions of -149,969,153 tons of CO_2e over the life of the Project. Therefore, the Project would result in a net reduction of GHGs. In accordance with 50 CFR Part 402, the BLM considered all areas to be affected directly or indirectly by the federal action. The BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on any listed species. 50 CFR §402.13 does not require the BLM to consult with Fish and Wildlife Service if a no effect call is determined. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. As disclosed further in Section 4.2, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA. Therefore, informal or formal consultation is not required as outlined in 50 CFR §402.13.

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520	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	Greenhouse gas emissions have direct, predictable, and devastating effects on endangered species and habitats. Species extinction risk will accelerate with continued GHG pollution. Climate change-related local extinctions are already widespread and have occurred in hundreds of species. One million animal and plant species are now threatened with extinction, with climate change as a primary driver. At 2°C compared with 1.5°C of temperature rise, the risk of species extinction will increase dramatically, leading to a doubling of the number of vertebrate and plant species losing more than half their range, and a tripling for invertebrate species. Numerous studies have projected catastrophic species losses during this century if climate change continues unabated: 15 to 37% of the world's plants and animals committed to extinction by 2050 under a mid-level emissions scenario; the potential extinction of 10 to 14% of species by 2100; global extinction of 5% of species with 2°C of warming and 16% of species with business-as-usual warming; the loss of more than half of the present climatic range for 58% of plants and 35% of animals by the 2080s under the current emissions pathway, in a sample of 48,786 species; and the loss of a third or more of animals and plant species in the next 50 years. As summarized by the Third National Climate Assessment, "landscapes and seascapes are changing rapidly, and species, including many iconic species, may disappear from regions where they have been prevalent or become extinct, altering some regions so much that their mix of plant and animal life will become almost unrecognizable." What is more, scientists can now predict specific harms to individual species from the incremental emissions increases directly attributable to the federal agency actions, and can also assess the consequences of emissions for listed species' conservation and recovery. For example, the recovery plan for the polar bear predicts three different scenarios for polar bear populations under scenarios where emissions are abated early, emissions are abated later, and where emissions continue unabated. Likewise, with respect to particular agency actions, scientists were able to calculate that the rollback of vehicle emissions standards by the Trump administration would have resulted in a sustained loss of more than 1,000 square miles of summer sea ice habitat for the polar bear and nearly one full additional day of ice-free conditions in Alaska and many other parts of the Arctic, which would reduce the length of the polar bear feeding season and lower reproductive success and survival. Thus as a scientific matter, there is no basis for any federal agency to assert that climate change does not harm endangered and threatened species or that it is scientifically impossible to ascertain the particular harm caused by an agency's contribution to greenhouse gas emissions. Furthermore, there are no defensible legal rationales for ignoring climate-threatened species that are harmed by the emissions that will result from a proposed agency action. Since 2008, federal agencies have taken cover behind a cursory, two-page memorandum from the FWS, which asserted, without any citation or acknowledgement of the scientific literature, that the "best scientific data available today do not allow us to draw a causal connection between GHG emissions from a given facility and effects posed to listed species or their habitats, nor are there sufficient data to establish that such impacts are reasonably certain to occur." Several months later, David Bernhardt—then Department of Interior Solicitor during the George W. Bush administration—issued a five-page memorandum concurring with the FWS. Even if these memoranda were correct at the time—and they were not—as the FWS memorandum stated: "As new information and knowledge about emissions and specific impacts to species and their habitats is developed, we will adapt our framework for consultations accordingly. This is particularly important as more regionally-based models are developed and refined to the level of specificity and reliability needed for the Service to execute its implementation of the Act's provisions ensuring consistency with the statute's best available information standard." Thus, the FWS and Bernhardt Memoranda were never intended to provide a permanent shield to avoid consultations, and any reliance on it today would simply be arbitrary and capricious. Indeed, new research by Drs. Steven Amstrup and Cecilia Bitz shows that it is now possible to quantitatively assess the link between anthropogenic greenhouse gas emissions, sea ice loss, and declining polar bear vital rates. "By quantifying the relationship between anthropogenic GHG emissions and polar bear recruitment, we show that sensitivities to cumulative anthropogenic emissions explain observed population trends, allow estimation of demographic impacts from new emissions sources, and enable ESA procedures to assess global warming impacts of proposed actions—along with impacts on the ground." This model suggests just one-way GHG emissions can be evaluated in the consultation process. Accordingly, all federal agencies must assess whether the emissions that result from their activities harm climate-threatened species.	The BLM analyzed impacts to air resources and greenhouse gas emissions, which are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Factoring in the estimated 150 million tons of CO2 that would be sequestered, the Project would result in net GHG emissions of -149,969,153 tons of CO_2e over the life of the Project. Therefore, the Project would result in a net reduction of GHGs, which would not harm listed species. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. The BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on any listed species. As disclosed further in Section 4.2, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA. Therefore, informal or formal consultation is not required as outlined in outlined in 50 CFR §402.13. No effect means there will be no consequences to listed species or critical habitat that result from the proposed action, including the consequences of any activities that would not occur but for the proposed action. It is within the scope of the BLM's legal authority as the action agency to determine that the action has no effect, and section 7 consultation is thus not required. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. See EA Sections 1.7.4 and 4.2, and letter in POD Appendices M and N for additional details and surveys completed.

521	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	BLM's approval of the Project would cross the low "may affect" threshold for climate-threatened species and requires consultation. If the agency determines that an action may affect a species—even if the effect is small, indirect, or the result of cumulative actions—it must formally consult with the Services. Federal courts have repeatedly held that the "may affect" threshold is "very low" and that any effect — whether "beneficial, benign, adverse or of an undetermined character" — is sufficient to cross that threshold. Only a scientific finding of "no effect" is sufficient to avoid the consultation process altogether. In essence, as the Joint Consultation Handbook explains, a "no effect" finding means exactly what it says, and is only properly made "when the action agency determines its proposed action will not affect a listed species or designated critical habitat"; it cannot be employed when an agency simply believes it is too hard to determine the impacts of its actions. It is abundantly clear that the proposed Project will generate significant GHG emissions. The Draft EA estimates that the Project will result in 4,734 tons CO2e from construction and 205 tons/year CO2e from operations, with the "worst-case annual Project CO2e emissions . . . calculated to be 1,695 tons per year." Using BLM's conservative estimate, 205 tons/year CO2e is the annual equivalent to burning 230,000 pounds of coal, EPA's GHG Equivalencies Calculator. Assuming at least a 20-year lifespan of the Project, 205 tons/year CO2e amounts to burning almost 4.6 million pounds of coal, as thoroughly discussed supra. These emissions do not even take into account the upstream gas plant emissions of the Project as a whole. Consequently, there are real impacts that cross the "may affect" threshold, even if some of those impacts are still of an undetermined character at this point. The purpose of the consultation process, by Congressional design, is to allow the expert wildlife agencies to assess these impacts using the best available science, so that they can evaluate the harm that may be caused. Any attempt by BLM to simply assert that it is unable to determine the impacts of greenhouse gas emissions on listed species is illegal and ultra vires. Only the expert wildlife agencies, with best scientific data available, can determine the effects of a federal action on species or habitat. The second step of the consultation process reinforces the basic notion that an action agency may not unilaterally assert that the GHGs that will be emitted will not harm listed species. Once the "may affect" threshold is crossed, the action agency must then prepare a "biological assessment" to determine whether the listed species may be adversely affected by the proposed action. If the action agency believes that the impacts of its greenhouse gas emissions are not significant, it may make a finding that such impacts are "not likely to adversely affect" listed species, which is defined as all impacts being "discountable" or "insignificant." Critically, however, the expert wildlife agencies must themselves concur regarding whether the action agency's scientific assessment of the impacts to climate-threatened species is correct. With respect to the GHG that will result from the proposed Project, the best available science suggests that this will result in substantial additional GHG emissions through the lifetime of the project. These emissions are appreciable and significant, and must be assessed under the ESA's consultation framework. This analysis is also consistent with President Biden's "whole of government" approach to addressing the climate crisis, as well as Executive Order 13990, which states that all federal agencies "must be guided by the best science and be protected by processes that ensure the integrity of Federal decision-making." Consultation on climate-threatened species that may be affected by cumulative impacts of emissions caused by the agency's action is similar to many other complex consultations undertaken by the Services. The Services must first attempt to quantify any take of listed species, but if such harms cannot be quantified, the Services can qualitatively assess the harm, something Congress contemplated when it passed the 1982 amendments to the ESA. The legislative history of those amendments reflects Congress' recognition that a numerical determination of take would not always be obtainable— such as when the eggs of listed species are boiled alive in power plant cooling systems—and intention that such challenges not present an insurmountable barrier to completing consultations.221 Furthermore, the Services have regularly relied on surrogates, such as habitat, ecological conditions, or a similarly-affected species that are easier to monitor in instances where the biology of a listed species or the nature of the proposed action makes it difficult to detect or monitor take of individual animals. Similarly, the Services must also assess the negative impacts of GHGs on critical habitat. Assessing the loss of critical habitat in a climate consultation is complex, but no more difficult than assessing critical habitat in other nationwide programmatic consultations. Under the Services' regulations,222 critical habitat is only adversely modified or destroyed when it appreciably diminishes the value of the "whole" designation. In many cases, climate impacts to critical habitat will affect the entirety of a designation — likely to the same extent in a relatively similar manner. For	The BLM analyzed impacts to air resources and greenhouse gas emissions, which are discussed in EA Section 3.2. The estimated direct emissions that would result from construction and drilling activities and the indirect emissions estimated for operations and monitoring activities are provided in EA Section 3.2.3. Factoring in the estimated 150 million tons of CO2 that would be sequestered, the Project would result in net GHG emissions of -149,969,153 tons of CO_2e over the life of the Project. Therefore, the Project would result in a net reduction of GHGs, which would not harm listed species. Although Denbury has existing agreements with emitters that currently transport CO2 via the existing CCA Pipeline, those agreements are specifically for EOR development (EPA UIC Class II). Separate agreements would be secured for the permanent sequestration of CO2 (EPA UIC Class VI) within the Project's pore space. The air quality analysis assumptions in EA Section 3.2.3 have been revised to clarify why upstream emission sources are not included. Because the sources of CO_2 are currently unknown, any assumptions about their location, type, or quantity would be speculative and would not support a meaningful analysis of cumulative air quality impacts. Moreover, these upstream sources would be existing and independent of this Project, and therefore subject to applicable EPA and/or state regulatory requirements under the Clean Air Act. Additionally, in Seven County Infrastructure Coalition v. Eagle County, Colorado, 2025 U.S. LEXIS 2068 (May 29, 2025), the U.S. Supreme Court held that agencies are not required under NEPA to evaluate upstream or downstream effects that are remote in time or geography from the proposed action, unless those effects are both foreseeable and causally connected. Accordingly, upstream sources are outside the scope of this EA. The BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on any listed species. As disclosed further in Section 4.2, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA. Therefore, informal or formal consultation is not required as outlined in outlined in 50 CFR §402.13. No effect means there will be no consequences to listed species or critical habitat that result from the proposed action, including the consequences of any activities that would not occur but for the proposed action. It is within the scope of the BLM's legal authority as the action agency to determine that the action has no effect, and section 7 consultation is thus not required. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. See EA Sections 1.7.4 and 4.2, and letter in POD Appendices M and N for additional details and surveys completed.

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See Previous Page	*See Previous Page*	example, acidification impacts to a listed coral are likely to be roughly equivalent across the range of each species, and sea level rise would likely harm the habitat of Florida Keys species relatively equally across the range, making it more likely that an adverse modification determination would be needed at the end of the assessment process. But the fact that the outcome of such an analysis is a positive adverse modification or destruction determination is not a legal justification for not conducting an analysis at all. Thus, to the extent that the impacts to critical habitat are significant, the Services must develop RPAs and RPMs — including through surrogate metrics — to address the habitat degradation that climate change is bringing. For both the jeopardy analysis and critical habitat analysis, the Services will need to develop analytical tools and methods that meet the standards of the Endangered Species Act, just as it does in traditional consultations, to address complex threats that are hard to assess quantitatively. The National Marine Fisheries Service can use the amount of sea ice lost as a surrogate for determining anticipated take of bearded seals, while the FWS can use declining stream flows and increasing water temperatures as a surrogate to infer the status of the western glacier stonefly or its critical habitat. This has been a pre-existing practice and the Services already have the knowledge and expertise to do this. If the Services ultimately determine that the proposed action will result in jeopardy, the Services must provide RPAs that will allow the agency to move forward in a way that avoids jeopardy to the species or destruction or adverse modification of designated critical habitat. While jeopardy determinations are rare, in the context of climate consultations they are all the more critical to the survival not only of listed species, but of humanity itself. If a federal agency action substantially increases the likelihood of overshooting the 1.5-degree Celsius goal of the Paris Agreement, it is likely to not only jeopardize climate-threatened species, but people everywhere. As the ESA makes clear, the action agency must not take such an action, or it must implement RPAs that ensure that GHG emissions decrease such that they are consistent with the goals of the Paris Agreement, the reports of the Intergovernmental Panel on Climate Change, and the best available science. Thus, consultations would provide a powerful mechanism to achieve President Biden's stated policy to "reduce climate pollution in every sector of the economy; increase resilience to the impacts of climate change; protect public health" and "conserve our lands, waters, and biodiversity." In instances where the federal agency actions will not rise to the level of jeopardy but will result in incidental take in areas that are geographically remote from the agency action itself, the Services must still issue RPMs to minimize the take of climate-threatened species. The most durable and effective approach for climate consultations to implement RPMs would be for the Services to condition the receipt of an incidental take statement (ITS) through the implementation of RPMs within a climate-focused Section 7(a)(1) conservation program for each climate-threatened species identified in the biological opinion where the Services anticipate take. Section 7(a)(1) requires all federal agencies to "utilize their authorities…by carrying out programs for the conservation of endangered species and threatened species." As the Supreme Court noted in Tennessee Valley Authority v. Hill, section 7(a)(1) is no less than "stringent, mandatory language,"227 that "reveals an explicit congressional decision to require agencies to afford first priority to the declared national policy of saving endangered species." By requiring agencies to develop a climate-focused Section 7(a)(1) conservation program as a condition to obtaining an ITS, the Services can require agencies to finally comply with the law and ensure that their activities are consistent with the recovery of listed species and address the take they cause.	*See Previous Page*

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522	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	In enacting the ESA, Congress made the deliberate decision "to give endangered species priority over the 'primary missions' of federal agencies" to "halt and reverse the trend toward species extinction, whatever the cost." To meet this mandate, Section 7(a)(2) "imposes two obligations upon federal agencies": a procedural requirement "that agencies consult with the [Services] to determine the effects of their actions on endangered or threatened species and their critical habitat," and a substantive duty to "insure that their actions not jeopardize endangered or threatened species or their critical habitat." Section 7 consultation is required for "any action [that] may affect listed species or critical habitat." If the proposed action "may affect" and is "likely to adversely affect" listed species or their critical habitat, the federal agency must initiate formal consultation with the Service. In making its "effects determination" the agency must assess whether a proposed action "may affect" listed species or critical habitat. The term "may affect" is broadly construed to include "[a]ny possible effect, whether beneficial, benign, adverse, or of an undetermined character," and is easily triggered. Section 7(d) of the ESA further provides that once a federal agency initiates or reinitiates consultation under the ESA, the agency, as well as any applicant for a federal permit, "shall not make any irreversible or irretrievable commitment of resources with respect to the agency action which has the effect of foreclosing the formulation or implementation of any reasonable and prudent alternative measures which would not violate subsection (a)(2) of this section."	The BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on any listed species. As disclosed further in Section 4.2, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA. Therefore, informal or formal consultation is not required as outlined in outlined in 50 CFR §402.13. No effect means there will be no consequences to listed species or critical habitat that result from the proposed action, including the consequences of any activities that would not occur but for the proposed action. It is within the scope of the BLM's legal authority as the action agency to determine that the action has no effect, and section 7 consultation is thus not required. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. See EA Sections 1.7.4 and 4.2, and letter in POD Appendices M and N for additional details and surveys completed.
523	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	In addition, because several listed species are within the project area, BLM must formally consult with the U.S. Fish and Wildlife Service (FWS) before commencing with any project review next steps.	The BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on any listed species. As disclosed further in Section 4.2, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA. No effect means there will be no consequences to listed species or critical habitat that result from the proposed action, including the consequences of any activities that would not occur but for the proposed action. It is within the scope of the BLM's legal authority as the action agency to determine that the action has no effect, and section 7 consultation is thus not required. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. See EA Sections 1.7.4 and Section 4.2, and letter in POD Appendices M and N for additional details and surveys completed.

524	Catherin-Sauer, Augusta; Northern Plains Resource Council	BLM must also fully disclose and analyze the Project's impacts on federally listed species, such as the greater sage-grouse, The entire Project area is within GRSG Priority Habitat Management Areas (PHMAs), and Denbury's surveys located significant sage grouse activity in the region. This species receives protection from Montana Executive Order 12-2015, as well as from BLM's own resource management plans (RMPs). BLM fails to analyze the Project's impacts on the GRSG in a way that violates the RMP, NEPA, and the ESA. Even at this early stage, it is already clear from Denbury's own documentation that the Project will significantly damage or impair habits which are vital to the life history and continued existence and recovery of the GRSG. Denbury projects there to be as many as 40 leks within the area of interest surrounding the project. Multiple leks are within very short distances of the construction area; at least one may be within 0.00 miles of the 0.6-mile no surface occupancy buffer and a proposed project ROW. The 2015 Miles City Field Office RMP already announced that it was BLM's policy to avoid "major ROWs" within the species' habitat, and to either avoid "minor ROWs" entirely or allow them only "with design features." In BLM's own words, "managing healthy and resilient sagebrush habitat is considered essential to the long-term health of GRSG populations that continue to experience pressure from a variety of factors, including invasive grasses, wildfire, drought exacerbated by climate change, and development."	The greater sage-grouse is not federally protected under the ESA; therefore, it was not included in the discussion of federally listed threatened and endangered species. The BLM coordinated with USFWS as disclosed in EA Section 4. The BLM considered BLM sensitive status species listed in BLM IM-2020-012 and followed Manual 6840 which directs the promotion of conservation and reduction of the likelihood and need for future listing under the ESA for species requiring special management consideration. See EA Section 3.5 for analysis on sage grouse. Denbury sage-grouse lek surveys were conducted in accordance with BLM survey requirements. Survey results were reviewed by BLM and incorporated into the MTFWP sage-grouse database. Lek locations are part of MTFWP data and are considered confidential and thus redacted on publicly available documents. The Project involves year-round operational activities that result in deviations from EO 12-2015: the Project's DDCT above 5% (0.16% above the existing 9.52% of agricultural disturbance) and year-round operational activities. Although the proposed action would be in a PHMA, this proposed action is in compliance with BLM sage-grouse goals, objectives, and management decisions based on Denbury's implementation of avoidance measures, adherence to stipulations and mitigation requirements, and compliance with the EO 12-2015 surface disturbance 5% limit deviation through compensatory mitigation that would not contribute to declines in sage- grouse population. See EA Section 1.4 for additional details on land use plan conformance for sage-grouse. The EA analyzed sage grouse and its associated habitat. The Montana HQT was completed for the proposed Project and the three conservation easements to determine debits and credits, respectively. The Project has been collocated with existing disturbance to avoid new disturbance to higher quality greater sage-grouse habitat (see Figure 6 in EA Appendix D). EA Section was updated to include clarification on the Montana HQT and its application to this Project. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the goals, objectives, and management of the Miles City RMP. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. This addition includes additional information (in section 2.2) indicating why the project location is limited to being in PHMA. As disclosed in EA Section 3.5, existing impacts from agricultural lands would be ongoing. The Program deviation policy multipliers (i.e. reserve account multiplier, net gain, Core/PHMA area operational, use during March 15- July 15) were applied, consistent with EO 12-2015, to ensure that mitigation is timely and effective throughout the life of the Project. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. The Project is designed to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. Only the operational well pads (each 300-feet by 300-feet), the two pump stations (each 5 acres), and one 0.25-mile access road would result in a land use change from vegetation to gravel. Additionally, approximately 10 acres of currently vegetated land would be converted to new two-tracks. This equates to approximately 46 acres of gravel and new two-tracks dispersed in small areas over the 100,200-acre Project area that would not be restored immediately after construction. After the 20-year CO2 injection period is complete, all infrastructure and facilities, including the graveled well pads, pump stations, and access road, would be removed, and final reclamation would be complete, restoring vegetative cover. Therefore, the BLM does not anticipate that short or long-term disturbances from the project would result in changes to land health standards or other vegetation resource objectives, The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also

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See Previous Page	*See Previous Page*	*See Previous Page*	implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements.
525	Catherin-Sauer, Augusta; Northern Plains Resource Council	There are impacts to antelope populations and this is also habitat for Ferruginous hawks which are a species of concern.	As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan, and determined that impacts to wildlife (except sage-grouse) and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. Denbury has committed to complete all construction, drilling, routine maintenance, and reclamation activities from July 16 to November 30 in any given year to avoid or minimize disturbance to grouse, migratory birds, raptors, and winter big game areas. In addition to restricting construction, drilling, routine maintenance, and reclamation activities, pipeline and injection well operations would be remotely monitored, and operational vehicle traffic for monitoring is expected be up to one vehicle visit per well per day, or less, depending on weather and operation conditions. Application of the mitigation measures listed in EA Section 3.5.3 are associated with the sage-grouse population. In addition to Denbury's committed measures and design features in the POD, these mitigation measures applied for sage-grouse may also serve to provide additional protection to big game species, including antelope, and raptors in the area.
526	Catherin-Sauer, Augusta; Northern Plains Resource Council	Can you describe where your sage-grouse habitat mitigation plan was derived from? It seems to be comparing apples to oranges to invest in a conservation credit plan for sage-grouse habitat when there is great habitat loss potentially expected in this project area? In addition we know the comment period is currently open for that, can you share any insights into what would be helpful types of information to receive during that comment period?	The BLM has formally adopted and implemented the state's approach to analyzing disturbance as outlined in EO 12-2015 Attachments D (Stipulations for Uses and Activities) and H (Definitions). The Program completed an HQT analysis for the Project and three compensatory mitigation sites. EA Section 3.5.1 was revised to include additional context on the Program's GIS-based HQT that consists of a three-level assessment to quantify the loss or gain of habitat function over the life of development and conservation projects. For conservation projects, credits are created through preservation, restoration, enhancement, and/or permittee-responsible mitigation projects, and are based on the functional acres gained or preserved. This function-based approach, in which debits and mitigation credits relate directly to the quality of the affected habitat function, standardizes the accounting of habitat gains and losses. Compensatory mitigation for habitat loss is not based solely on the affected acreage, but the quality of the affected habitat. Additional information about the HQT is published in the *Montana Mitigation System Habitat Quantification Tool Technical Manual for Greater Sage-Grouse* available at https://sagegrouse.mt.gov/documents/HabitatQuantificationToolTechnicalManualv1.1. In its letter dated September 11, 2023, the Program concluded that the proposed activities that are presented in Denbury's Greater Sage-Grouse Mitigation Plan (POD Appendix I), including the use of compensatory mitigation credits, are consistent with the Montana Sage Grouse Conservation Strategy.
527	Hunkins, Sarah; Western Organization of Resource Councils	The land slated for this development also has immense biodiversity that would be severely impacted by this proposed ROW. BLM and Denbury both acknowledge that the proposed project will be sited in a Priority Habitat Management Area for Greater Sage Grouse (GRSG). Pronghorn, mule deer, and coyotes are also native to Carter County, making it important to more rigorously assess and evaluate impacts to these species – and to do so in partnership with the Fish and Wildlife Service (FWS). Despite this, BLM has not consulted with or obtained input from the FWS, and instead, uncritically accepts the developer's proposed "avoidance measures" and "mitigation requirements" as adequate to alleviate impacts to designated critical habitat. It's critical that BLM collaborate with FWS in developing a more accurate Environmental Assessment and more robust mitigation and avoidance measures – in order to ensure that if this project moves forward, these species are protected.	50 CFR §402.13 does not require the BLM to consult with Fish and Wildlife Service if a no effect call is determined. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. The BLM did not consult, formally or informally, with FWS, but rather coordinated with them. EA Section 4.2 was updated to clarify the BLM coordinated with USFWS on the project, which did not include informal consultation. EA Section 4.2 was updated to clarify that the BLM coordinated with USFWS on the project, which did not include informal consultation. Also, EA Section 4.2 discloses coordination with USFWS. Based on the May 4, 2022 letter, the USFWS indicated that additional efforts for protected butterfly species (Dakota skipper) would not be needed for the Project. However, for the NLEB, the BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on NLEB. As disclosed further in Section 4.2, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect the NLEB, other listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA. EA Section 4.2 was also updated to include BLM and FWP coordination on the project.

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528	Bogdan Tejeda, Victoria; Center for Biological Diversity et al.	The Draft EA identifies at least three federally protected species and/or designated critical habitat within the project area: GRSG (Centrocercus urophasianus), Dakota skipper butterfly (Hesperia dacotae), and northern long-eared bat (Myotis septentrionalis). The Project will adversely affect all of these species. For example, both BLM and Denbury acknowledge that entire Project will be sited entirely in GRSG Priority Habitat. BLM's attempt to evade significance by noting that "[a]lthough the proposed action would be in a PHMA [Priority Habitat Management Area], this proposed action is in compliance with BLM sage-grouse management decisions based on Denbury's implementation of avoidance measures and adherence to stipulations and mitigation requirements" does not absolve the agency from evaluating the impacts purportedly being mitigated, and does not satisfy the agency's statutory mandate to take a "hard look" at the impacts of the project on GRSG and its habitat.	The MCFO interdisciplinary team considered the Montana Natural Heritage Program database, USFWS IPAC database, internal BLM data, staff expertise, and other information, as appropriate, to determine if special status species or associated habitats are known to occur or could occur in the Project area. As disclosed in EA Section1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan. The BLM determined that impacts to wildlife (except sage-grouse), fisheries, including special status species, and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted. EA Section 4.2 was updated to clarify that the BLM coordinated with USFWS on the project, which did not include informal consultation. Also, EA Section 4.2 discloses coordination with USFWS. Based on the May 4, 2022 letter, the USFWS indicated that additional efforts for protected butterfly species (Dakota skipper) would not be needed for the Project. However, for the NLEB, the BLM determined that the activities that are under the jurisdiction of the BLM, as detailed in the EA, would have a no effect on NLEB. As disclosed further in Section 4.2, because the proposed action would be constructed in stages over a 20-year period, permitting agencies would be required to revisit and determine if ongoing or future construction may affect the NLEB, other listed species, and/or any newly listed species based on new information and listing decisions and initiate consultation if needed to comply with ESA. No effect means there will be no consequences to listed species or critical habitat that result from the proposed action, including the consequences of any activities that would not occur but for the proposed action. It is within the scope of the BLM's legal authority as the action agency to determine that the action has no effect, and section 7 consultation is thus not required. With a no effect determination the action agency is not required to notify USFWS or seek concurrence with a no effect determination as USFWS is not obligated to review it, concur with it, or otherwise provide comments on it. Further details on interagency cooperation are listed in section 7 regulations at 50 CFR Part 402. See EA Sections 1.7.4 and Section 4.2, and letter in POD Appendices M and N for additional details and surveys completed. The greater sage-grouse is not federally protected under the ESA; therefore, it was not included in the discussion of federally listed threatened and endangered species. The BLM coordinated with USFWS as disclosed in EA Section 4. The BLM considered BLM sensitive status species listed in BLM IM-2020-012 and followed Manual 6840 which directs the promotion of conservation and reduction of the likelihood and need for future listing under the ESA for species requiring special management consideration. See EA Section 3.5 for analysis on sage grouse.

529	Axelrod, Joshua; Natural Resources Defense Council	Greater sage-grouse is often used as an indicator species for the overall health of the sagebrush steppe and that ecosystem's ability to support its many species and other natural resource values. Despite impacts to GRSG being perhaps the most significant possible impact of this proposed project, the actual impacts of the project on GRSG populations are confined to less than six pages of discussion in the Draft EA. This is an especially concerning oversight by the BLM given that the Draft EA contains no significant analysis of applicant-proposed mitigation measures and whether they will help to ensure that the Snowy River Project will not lead to further population declines for this critical species. Indeed, the Draft EA essentially quotes the Project proponent's plan of development (POD) for GRSG mitigation, which also contains no information which stakeholders can use to assess whether avoidance, mitigation, minimization, and compensation proposals will prevent further population declines of GRSG in the area. This complete dearth of analysis also means that it is largely impossible to determine this project's compliance with the governing 2015 Miles City Field Office Resource Management Plan (MCFO RMP). Under this plan, the entire Snowy River Project is located within a GRSG priority habitat management area (PHMA). As defined, PHMAs are "lands identified as having the highest value to maintain sustainable GRSG populations." To maintain sustainable GRSG populations, "PHMAs are listed as avoidance areas for major and minor ROWs." Consequently, "surface disturbing and disruptive activities would be strongly discouraged. ROW avoidance areas may be available for location of ROWs with special stipulations/mitigation." As discussed briefly above, the "special stipulations/mitigation" thus required for this project have not been presented in a manner that allows stakeholders to judge whether impacts will truly be mitigated. Similarly, the project proponent relies heavily on a compensatory mitigation scheme whereby permanent conservation easements will be purchased on lands outside of the project area. On its face, this appears to comply with the MCFO RMP, which states, in undertaking BLM management actions, and, consistent with valid existing rights and applicable law, in authorizing third-party actions that result in habitat loss and degradation, the BLM will require and ensure mitigation that provides a net conservation gain to the species including accounting for any uncertainty associated with the effectiveness of such mitigation. However, it is important to note that the BLM appears to treat impacts to GRSG populations within the project area as immaterial given that the entirety of the lands conserved via conservation easements are not only outside the project area, but also would benefit different GRSG populations than those impacted by the project. This tangential benefit to GRSG populations present elsewhere is presented as a "net conservation gain" attributable to the proposed mitigation plan for the project and thus in compliance with the MCFO RMP. The Draft EA thus avoids any type of meaningful analysis of impacts to the actually affected population of GRSG, which surveys show to be present in meaningful numbers and in close proximity to several project components. This is concerning given that the PHMA in question represents the single largest intact BLM parcel in the region. Given its relative intactness, these lands provide core connectivity and a population safe haven for GRSG within this isolated regional population. No amount of mitigation can satisfactorily address the fragmentation that will accompany the proposed activities, further putting this proposal at odds with PHMA management objectives, which require the agency to limit or eliminate surface disturbances. Similarly problematic is the BLM's anthropogenic disturbance survey, which finds that the PHMA within which the Snowy River Project is proposed currently has surface disturbances totaling 9.52 percent without construction of the Project. Under the MCFO RMP, [i]f the 3% disturbance cap is exceeded on all lands (regardless of land ownership) or if anthropogenic disturbance and habitat loss associated with conversion to agricultural tillage or fire exceed 5% within a proposed project analysis area in a Priority Habitat Management Area[], then no further discrete anthropogenic disturbances . . . will be permitted by BLM within PHMA in a project analysis area until the disturbance has been reduced to less than the cap. The BLM then tries to discount the existing 9.52 percent disturbance level by removing "croplands" from the figure. However, that appears to be in direct violation of the MCFO RMP, which states that agricultural disturbances fall within the MCFO RMP's expanded five percent disturbance cap. In summary, we are concerned that the BLM's failure to prepare an EIS means that impacts to GRSG populations within the 100,200-acre project area have gone largely unconsidered and that this failure necessitates preparation of a	Whether an EA or EIS is required depends on the significance of a project's potential effects. For the Denbury Snowy River CO_2 Sequestration Project, the BLM conducted an EA under the CEQ regulations in effect at the time of the application (40 CFR Parts 1500–1508, rescinded April 11, 2025). This approach aligns with the Department of the Interior's NEPA procedures (516 DM 1, July 2025). Although NEPA does not require public involvement for an EA, the BLM's NEPA review for the Project included robust public participation, featuring a scoping period extended from 30 to 60 days and a comment period extended from 30 to 90 days. Based on the EA, if the BLM determines the project would not cause significant environmental impacts, it may issue a Finding of No Significant Impact. The EA specifically identifies and discusses potential impacts that may occur as a result of the proposed action. BLM is reviewing direct, indirect and cumulative effects, in addition to public comments received during the public review of the EA, to determine if the quality of the human environment, individually or cumulatively with other actions in the general area meet the definition of significance in context or intensity that would warrant preparation of an EIS. As stated in EA Section 1.4, the proposed ROWs are in accordance with the decisions contained in the 2015 MCFO ROD and approved RMP which states PHMAs are listed as avoidance areas for major and minor ROWs (Management Decision 3 on pages 2-9 and 2-10) and not "exclusion areas" (i.e. ROWs prohibited). Chapter 6 of the 2015 MCFO RMP defines avoidance areas as "Areas with sensitive resource values in which ROWs and surface disturbing and disruptive activities would be strongly discouraged. ROW avoidance areas are to be avoided but may be available for location of ROWs with special stipulations / mitigation." Although the proposed action would be in a PHMA, this proposed action is in compliance with BLM sage-grouse management decisions based on Denbury's implementation of avoidance measures and adherence to stipulations and mitigation requirements. The Project involves year-round operational activities that result in deviations from EO 12-2015: the Project's DDCT above 5% (0.16% above the existing 9.52% of agricultural disturbance) and year-round operational activities. Although the proposed action would be in a PHMA, this proposed action is in compliance with BLM sage-grouse goals, objectives, and management decisions based on Denbury's implementation of avoidance measures, adherence to stipulations and mitigation requirements, and compliance with the EO 12-2015 surface disturbance 5% limit deviation through compensatory mitigation that would not contribute to declines in sage--grouse population. See EA Section 1.4 for additional details on land use plan conformance for sage-grouse. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. EA Section 3.5.1 was revised to include additional context on the Program's GIS-based HQT that consists of a three-level assessment to quantify the loss or gain of habitat function over the life of development and conservation projects. For conservation projects, credits are created through preservation, restoration, enhancement, and/or permittee-responsible mitigation projects, and are based on the functional acres gained or preserved. This function-based approach, in which debits and mitigation credits relate directly to the quality of the affected habitat function, standardizes the accounting of habitat gains and losses. Compensatory mitigation for habitat loss is not based solely on the affected acreage, but the quality of the affected habitat. Additional information about the HQT is published in the *Montana Mitigation System Habitat Quantification Tool Technical Manual for Greater Sage-Grouse* available at https://sagegrouse.mt.gov/documents/HabitatQuantificationToolTechnicalManualv1.1. Denbury would also implement compensatory mitigation as required by the Program and offset impacts to sage-grouse habitat using perpetual conservation easements. In its letter dated September 11, 2023, the Program concluded that the proposed activities that are presented in Denbury's Greater Sage-Grouse Mitigation Plan (POD Appendix I), including the use of compensatory mitigation credits, are consistent with the Montana Sage Grouse Conservation Strategy. The BLM has considered and assessed the Program analysis in the EA. In addition, the BLM has included additional discussion on functional acres relative to their location in GHMA and PHMA. Furthermore, the BLM clarified that results from the DDCT and HQT analysis were utilized as one part of multiple lines of evidence in the EA to assess significant impacts to sage-grouse and conformance with the

Row #	Name; Organization (if provided)[1]	Comment Text	Comment Response[2]
See Previous Page	*See Previous Page*	much more thorough environmental review. Along similar lines, we see analysis justifying the BLM's approach to considering this project despite current anthropogenic disturbances within the PHMA—and thus the entire project area— significantly exceeding caps that the MCFO RMP put in place to prevent additional degradation of critical GRSG habitat. The agency must elaborate on how it believes permitting this project can comply with the applicable RMP and, via application of the latest and best available science, avoid or minimize harmful impacts to the resident GRSG in the project area.	goals, objectives, and management of the Miles City RMP. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations within each of the USGS-recommended conservation buffers around sage-grouse leks. In addition, the BLM has included more explicit analysis to on satisfying the ROW avoidance allocation, including how the associated activity and density of this project will impact sage-grouse. As stated in EA Section 3.5.3, Denbury would implement a mitigation and conservation hierarchy to avoid and minimize impacts to sage-grouse and its habitat, as well as compensate for residual impacts that cannot be mitigated. From its initial submission (see EA Section 2.3 Alternative Considered but Eliminated), design modifications were made to avoid or minimize impacts through Project siting by a reduced footprint of 475 acres (DDCT 0.16 percent decrease in availability of sage-grouse habitat), maximum co-location on/along existing disturbances to avoid functional habitat (see Figure 6 in EA Appendix D), phased development over multiple years, adherence to seasonal timing stipulations, no changes to ambient sound level, a Reclamation, Mitigation, and Monitoring Plan with seed mixes that include Wyoming big sagebrush, native grasses and forbs to enhance habitat, and control of invasive and noxious weeds throughout the life of the Project. The BLM applied three mitigation measures to operations that would further minimize impacts to sage-grouse. If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. Denbury would also implement compensatory mitigation as required by the Program and BLM to offset remaining impacts to sage-grouse habitat using perpetual conservation easements. For this analysis the BLM took into consideration that a conservation easement may afford certain protection measures that would not be imposed without the conservation easement on privately owned lands. The easements may compliment and possibly augment BLM sage-grouse RMP decisions and mitigation measures, along with Montana EO 12-2015 requirements (includes multipliers for net gain). Therefore, at a landscape scale, when measures are considered together, there would likely be a cumulative net conservation gain to the habitat by augmenting protection to sage-grouse habitat as a whole. Additional analysis has been added assessing PHMA (core) and GHMA contributions to meeting GRSG goals and objectives. EA Section 3.5.3 has been revised to provide further clarification of proposed activities and mitigation measures, both during Project construction and operational stages, that would avoid and further minimize impacts to sage-grouse populations . If ROW grants are authorized, motorized vehicle use would be restricted for all operational and monitoring activities between 10 a.m. and 6 p.m. from March 15 to July 15, and no motorized vehicle access to Injection Wells 01, 02, 03, 04, 05, 06, 07, and 11 during harsh winter conditions (defined in EA Section 3.5.3). These restrictions would not apply to emergency situations. EA Section 3.5.1 has also been revised to include additional context regarding the effects that severe winter weather and drought can have on sage-grouse mortality, which may have contributed to population declines in and around the Project area.
530	Oertli, Patricia	Wildlife will definitely suffer	As disclosed in EA Section 1.7.4, the BLM considered the applicant committed measures and Project design features in the POD and POD Appendix G Reclamation, Mitigation, and Monitoring Plan. The BLM determined that impacts to wildlife (except sage-grouse), fisheries, including special status species, and associated habitats would be avoided (temporally or spatially) or minimized and would not be affected to a degree that detailed analyses were warranted.