PEIS IOP or Mitigating Measure	Edited IOP or Mitigating Measure	Planning	Construction	Initial, Long Term Mitigation	Monitoring/ Maintenance/ adaptive mgt.
Outside of riparian areas, if construction must be conducted during the bird breeding season, the construction area should first be surveyed for nests. If a migratory bird nest were to be found with eggs or nestlings present, the area should be avoided, to the extent practicable, until the birds have fledged. E.O. 13186 defines the responsibilities of federal agencies to protect migratory birds. The Migratory Bird Treaty Act of 1918 and subsequent amendments (16 USC 703–711) state that it is unlawful to take, kill, or possess migratory birds. A list of these protected birds is in 50 CFR 10.13. In compliance with this E.O., DOE finalized a MOU with the USFWS on August 3, 2006, that guides future agency regulatory actions and policy decisions.	Outside of riparian areas, if construction must be conducted during the bird breeding season, the construction area should first be surveyed for nests. To comply with the provisions of the Migratory Bird Treaty Act, if a migratory bird nest were to be found with eggs or nestlings present, the area should be avoided, to the extent practicable, until the birds have fledged.	NA	YES	NA	NA
Page: 3-231					
Wildlife should be removed from open trenches during construction. Earthen ramps should be used in open trenches to allow wildlife an escape mechanism.	Earthen ramps should be used in open trenches as a wildlife escape mechanism. Open trenches should be inspected daily, and before backfilling, to locate trapped wildlife, and remove them from the trench.	NA	YES	NA	NA

VII. SUGGESTED NEW IOPs, AND MITIGATION MEASURES

(Phase of the project is indicated by **.)

Suggested New Mitigating Measure Or Interagency Operating Procedure	Planning	Construction	Initial and long term Mitigation	Monitoring/maintenance/adaptive management
After authorization of the project, if any new impacts to federally listed species become evident or increase beyond those evaluated in the project specific NEPA analysis, consultation with USFWS or NMFS should be reinitiated. **Add to IOPs.**		**	**	**
Applicants should comply with the provisions of the Migratory Bird Treaty Act of 1918 and subsequent amendments (16 USC 703–711). **Add to IOPs.**		**		
On an as-needed basis as determined and specified through consultations with appropriate state and federal fisheries and water quality agencies, power washing of equipment with water and other chemicals as specified shall be required to avoid transfer of whirling disease, parasites, or nuisance organisms from one stream system to another.		**		
The applicant will develop and implement measures to mitigate the effects of hydrostatic testing, including screening intake hoses to prevent the entrainment of fish and other aquatic organisms and regulating the rate of withdrawal of hydrostatic test water to avoid adverse impact on aquatic resources or downstream flows. Discharge of waters into streams should meet habitat requirements compatible with resident fisheries.	**	**		
To avoid impacts to listed plant species, a qualified botanist should be on site any time noxious weed spraying is taking place in occupied T&E plant habitat.		**	**	**
In no case will final restoration of an area be delayed beyond the next available seeding season.			**	
The transmission lines should be designed and constructed in conformance with the *Avian Power Line Interaction Committee Guidelines* (APLIC and USFWS 2005) to reduce the operational and avian risks that result from avian interactions with electric utility facilities. (**Add to page 3-228, preconstruction mitigation for wildlife**)	**			
All seasonal constraints and buffer zones applicable to raptor nests and sage grouse breeding complexes would apply to all scheduled maintenance activities			**	**

Suggested New Mitigating Measure Or Interagency Operating Procedure	Planning	Construction	Initial and long term Mitigation	Monitoring/maint enance/adaptive management
(Add to page 3-232, Mitigation during operation and maintenance)				
Applicants shall monitor seeded/reclaimed sites for a period of 5 years to assess seeding success. Annual reports shall be filed with the appropriate land management agency. If reclamation is not successful, reseeding of the sites will be accomplished as required by the appropriate land management agency. The 5 year requirement for monitoring of the reclamation shall start over at the time of the reseeding effort. Reseeding shall be required no more than three times at any given location.			**	**
All resource data collected by the applicant, during any phase of the project, shall be provided to the lead agency for distribution to appropriate agencies. Spatial data shall be conveyed in a GIS format as agreed to with the lead agency. **Add to IOPs.**	**	**	**	**
Plans should be developed to stipulate how fuel will be stored, loaded into equipment, contained if spilled and how spills will be addressed if they occur. **Add to IOPs.**	**			

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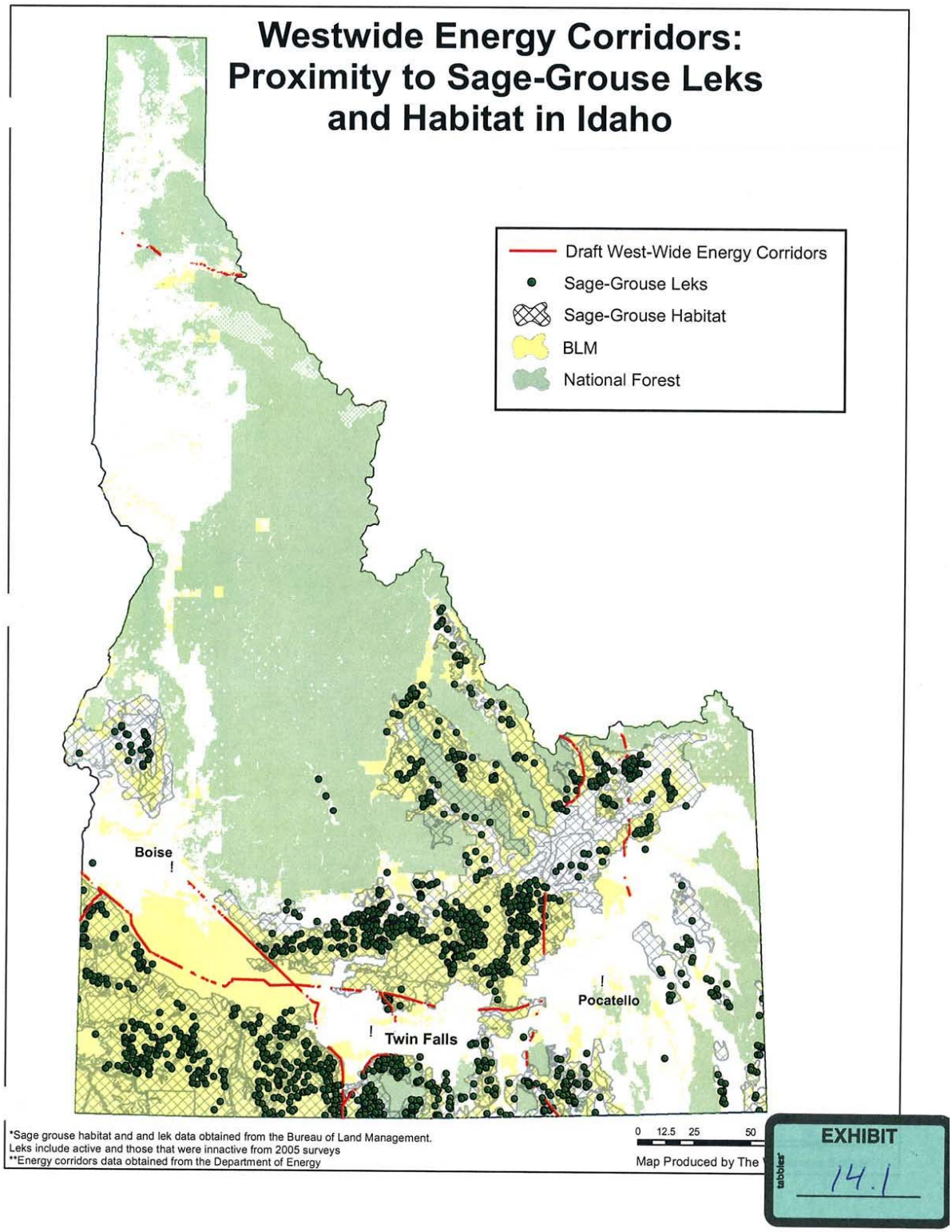
Westwide Energy Corridors:
Proximity to Sage-Grouse Leks
and Habitat in Idaho
Draft West-Wide Energy Corridors
Sage-Grouse Leks
Sage-Grouse Habitat
BLM
National Forest
Boise
Twin Falls
Pocatello
*Sage grouse habitat and and lek data obtained from the Bureau of Land Management.
Leks include active and those that were innactive from 2005 surveys
**Energy corridors data obtained from the Department of Energy
0 12.5 25 50
Map Produced by The
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California Public Utilities Commission

505 Van Ness Avenue, San Francisco, CA 94102

News Release

FOR IMMEDIATE RELEASE Docket #: R.06-04-009

Media Contact: Terrie Prosper, 415.703.1366, news@cpuc.ca.gov

PUC SETS GHG EMISSIONS PERFORMANCE STANDARD TO HELP MITIGATE CLIMATE CHANGE

SAN FRANCISCO, January 25, 2007 -- The California Public Utilities Commission (PUC) today adopted an interim Greenhouse Gas (GHG) Emissions Performance Standard in an effort to help mitigate climate change.

The Emissions Performance Standard is a facility-based emissions standard requiring that all new long-term commitments for baseload generation to serve California consumers be with power plants that have emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO_2 per megawatt-hour. "New long-term commitment" refers to new plant investments (new construction), new or renewal contracts with a term of five years or more, or major investments by the utility in its existing baseload power plants.

The PUC's actions implement Senate Bill (SB) 1368 (Perata), which prohibits load-serving entities (investor-owned utilities, energy service providers, community choice aggregators) from entering into long-term financial commitments for baseload generation unless it complies with a GHG emissions performance standard.

"To help mitigate climate change, the PUC has long anticipated capping greenhouse gas emissions in order to ensure that load-serving entities make long-term commitments to energy resources that have GHG emissions profiles that are at least as clean as California's existing portfolio," said PUC President Michael R. Peevey.

The Commission approved a policy statement indicating its intent regarding GHG emissions in October 2005. Since then, Governor Schwarzenegger signed into law SB 1368 and Assembly Bill 32 (Nuñez/Pavley), which requires reporting and verification of statewide GHG emissions.

"The Emissions Performance Standard is a vital step towards achieving the emissions reductions goals of AB 32 and protecting our ratepayers against the risk of high carbon prices in the

California Public Utilities C

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not-too-distant future," said PUC Commissioner Dian M. Grueneich. "At the same time, this decision leaves the door open to new, advanced technologies and carbon sequestration projects that will allow the energy industry to develop clean and sustainable sources of power."

"Global warming is a critical issue that needs to be addressed now. This decision is an important interim step until a statewide greenhouse gas emissions cap is in place," said PUC Commissioner Rachelle Chong.

"Today's decision is an important step in our efforts to reduce greenhouse gas emissions," said PUC Commissioner John Bohn. "Our next task is to harness the power and creativity of the marketplace to address global warming."

The adopted emissions performance standard is intended to serve as a near-term bridge until an enforceable load-based GHG emissions limit is established and in operation. At that time, as directed by SB 1368, the Commission will reevaluate and continue, modify, or replace this standard in consultation with the California Energy Commission and the California Air Resources Board.

For more information on the PUC, please visit www.cpuc.ca.gov.

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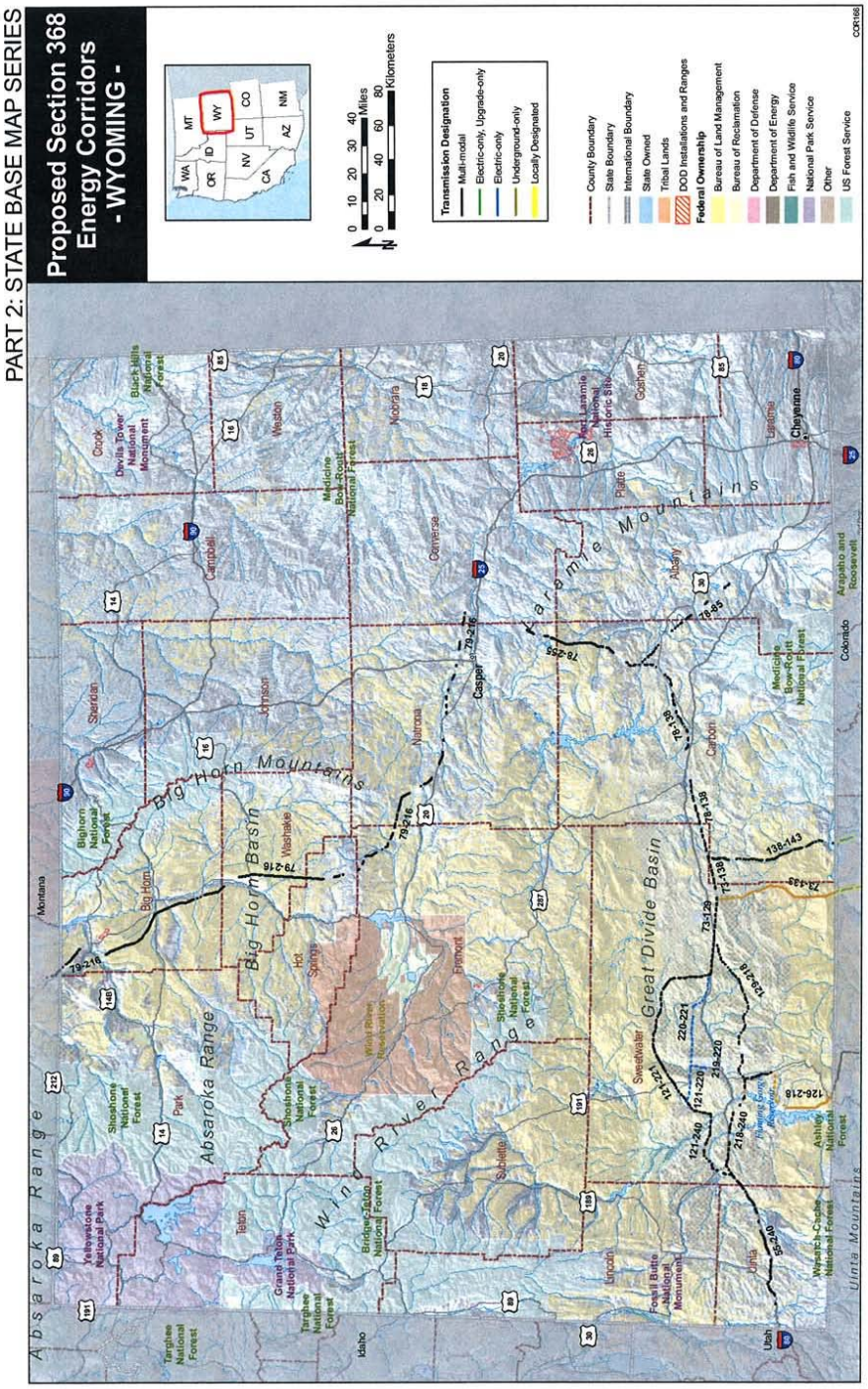

EXHIBIT 16

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Proposed Electric Transmission Lines on Public Lands
Updated October 12, 2007

Projects are listed in status order (Record of Decision back to conceptual studies)

Palo Verde-Devers 2 Project
[www.sce.com/PowerandEnvironment/GoalsandImprovements/cadpv2]

Proponent:	Southern California Edison
Location:	Palo Verde Generating Station, Arizona to Valley Substation, west of Hemet, California
Federal Lands:	Two BLM FOs, DOD, BOR and the Kofa National Wildlife Refuge. Total length on federal lands is 150 miles.
Type of Line:	500 kV AC (182 miles of new line, 48 miles of upgraded 230 kV)
Length of Line:	230 miles, 102 in Arizona and 176 miles in California. Follows existing transmission lines and generally Interstate Highway 10.
Project Status:	California Public Utilities Commission (CPUC) and BLM preparing joint EIR/EIS. Greg Hill, Palm Springs – South Coast FO, is Project Manager. FEIS released March 2007. BLM ROD expected in early 2008. Other approvals already issued by: California Public Utilities Commission, Arizona Power Plant and Line Siting Committee, a ROW from the FWS, but project rejected by the Arizona Corporation Commission. Project may be delayed two years.

Navajo Transmission Project

Proponent:	WESTERN (on behalf of Dine Power Authority, an enterprise of the Navajo Nation)
Location:	Farmington, NM to Boulder City, NV.
Federal Lands:	289 miles of lands administered by BIA (two Regional Offices), 53 miles administered by BLM (three FOs), 19 miles of Forest Service lands (Kaibab NF), and 11 miles administered by NPS (Lake Mead NRA).
Type of Line:	500 kV AC
Length of Line:	461 miles
Project Status:	ROD issued by WESTERN in October 1997. Project withdrawn in 1998. Applicant reapplied. BIA now lead agency for ESA and NHPA compliance. BLM lead agency for NEPA compliance. Existing NEPA analysis determined adequate in 2004. National Project Manager assigned (Lucas Lucero, LVFO). Final POD expected in September 2007. Waiting for access agreement across Hualapai Reservation before BLM issues ROW grant.

Ely Energy Center (EEC) [www.sierrapacificresources.com/projects/ely]

Proponent:	Sierra Pacific and Nevada Power
Location:	Two 750 MW coal fired power plants and two 500 MW integrated gasification combined-cycle generating units with ancillary facilities (including a solid waste disposal site) north of Ely, Nevada; two transmission lines from Ely to Las Vegas, NV; 100 mile long rail spur from Shafter to Ely, NV to connect UP mainline for bringing coal from the Powder River Basin

Federal Lands:	Power Plant: 2,500 acres direct sale, 500 acres under a ROW for Power Plant ancillary facilities. Amount of federal lands for transmission and rail lines is uncertain.
Type of Line:	two 500 kV AC lines
Length of Line:	250 miles
Project Status:	National Project Manager assigned (Joe Incardine, USO). The Formal Scoping Period for the EIS closed on February 26, 2007. The Preliminary Draft EIS is being prepared.

Gateway – West (formerly Dave Johnston to Melba) Project

Proponent:	PacificCorp and Idaho Power
Location:	Dave Johnston Power Plant at Glenrock, Wyoming to a new substation at Melba, Idaho, approximately 20 miles southwest of Boise, Idaho
Federal Lands:	Twelve BLM Field Offices, two National Forests, four National Wildlife Refuges, five units of the National Park Service, an Indian Reservation, and an Air Force Base.
Type of Line:	500 and 230 kV AC
Length of Line:	Approximately 1,175 miles
Project Status:	BLM ROW application filed at the Wyoming State Office in May 2007 with $30,000 initial cost recovery deposit. Revised application filed October 2007. National Project Manager assigned (Walt George, WSO). BLM SO/FO contacts identified. Internal scoping begun. Potential federal cooperating agencies contacted. Initiating contacts with States of Idaho and Wyoming. Projected construction start 2011.

Gateway – South (formerly Jim Bridger to Crystal) Project

Proponent:	PacificCorp
Location:	Jim Bridger Power Plant near Rock Springs, Wyoming to the Crystal Substation near Las Vegas, Nevada
Federal Lands:	Twelve BLM Field Offices, three National Forests, and other federally administered areas
Type of Line:	500 kV AC
Length of Line:	Approximately 625 miles
Project Status:	ROW application filed at the Wyoming State Office in May 2007 with $30,000 initial cost recovery deposit. National Project Manager assigned (Walt George, WSO). BLM SO/FO contacts identified. Internal scoping begun. PacifiCorp coordinating with Arizona Public Service and NationalGrid on joint project development. Projected construction start 2011.

Northern Lights Project [www.transcanada.com/company/northernlights.html]

Proponent:	TransCanada
Location:	Two lines - - One begins near Coalstrip, Montana, the other in the Powder River Basin of Wyoming. Both lines end in Las Vegas, Nevada. The states of Idaho, Montana, Nevada, and Wyoming are crossed
Federal Lands:	14 BLM Field Offices (65% of the routes are on public land), more than 5 National Forests and numerous other federally administered areas
Type of Line:	500 kV DC
Length of Line:	Each line is over 1,000 miles long

Project Status:	Applications filed in BLM offices in Montana and Wyoming in July 2006. National Project Manager assigned (Walt George, WSO). Draft cost recovery agreement sent to the applicant in December 2006. A signed agreement and the initial deposit have not been received

Mountain States Transmission Intertie (formerly Townsend to Midpoint) Project [www.msti500kv.com]

Proponent:	NorthWestern Energy
Location:	New substation at Townsend or Garrison in southwestern Montana to Midpoint or Borah substation in southern Idaho
Federal Lands:	Approximately five BLM Field Offices, three National Forests, and a few other federally administered areas
Type of Line:	500 kV AC
Length of Line:	350 - 390 miles
Project Status:	BLM ROW application filed in August 2007 in Montana State Office. Craig Haynes (MSO), Interim Project Manager. Cost Recovery documents sent to applicant. NEPA analysis to be cooperatively prepared with Montana DEQ under NEPA, and Montana Major Facility Siting and Environmental Policy Acts. Projected construction start 2010.

SunZia Southwest Transmission Project [www.sunzia.net]

Proponent:	Southwestern Power Group
Location:	Phoenix to central New Mexico
Federal Lands:	4 – 6 BLM Field Offices, National Forests and other federal lands.
Type of Line:	One or two 500 kV AC
Length of Line:	250 – 3000 miles
Project Status:	Finalizing the Memorandum of Agreement (MOA) for development. Preliminary ROW Application filed in New Mexico State Office. Adrian Garcia (NMSO), assigned as Project Manager.

Wyoming-West Power Line Project

Proponent:	National Grid and the Wyoming Infrastructure Authority
Location:	Follows the Interstate Highway 80 corridor in southwest Wyoming into northwest Colorado and ends at substations in central Utah.
Federal Lands:	12 BLM Field Offices, 4 – 6 National Forests, and 2 Indian Reservations
Type of Line:	500 kV AC
Length of Line:	360 miles
Project Status:	Application filed in the Wyoming State Office in March 2007. Walt George (WSO) is Interim Project Manager. Applicant sent a draft cost recovery agreement. The initial deposit and signed agreement have not been returned. Project work suspended by applicant request.

TransWest Express Project [www.transwest.azpsoasis.com]

Proponent:	Arizona Public Service Company (Southern California Edison, Salt River Project, Tucson Electric Power, Wyoming Infrastructure Authority, and NationalGrid are interested utilities)
Location:	From Central Wyoming, through Salt Lake City, Western Colorado, or Central Utah to Phoenix or Las Vegas

Federal Lands:	More than 10 BLM field offices, 5 National Forests and numerous other federally administered areas
Type of Line:	two new 500 kV AC or one new 500 kV DC lines transmitting 3,000 MW
Length of Line:	Approximately 1,000 miles
Project Status:	Phase I feasibility study completed. ROW application expected by the end of October 2007. Walt George (WSO) is Interim Project Manager. This project is one transmission option in the Frontier Line study.

Frontier Line Project

Proponent:	Promoted by the Governors of California, Nevada, Utah and Wyoming and involving up to six utilities
Location:	No specific route at this time, expected to serve major load centers such as Salt Lake City, Reno, Las Vegas, Southern and Northern California
Federal Lands:	More than 10 BLM field offices, 5 National Forests and numerous other federally administered areas
Type of Line:	Line voltage unknown at this time but expected to transmit 6,000 MW of wind energy and 6,000 MW of clean coal power
Length of Line:	Unknown, but likely between 750 – 1,000 miles
Project Status:	In the pre-feasibility study phase. This proposal is coordinated with the TransWest Express Project.

High Plains Express Project [www.rmao.com/wtpp/HPX_Studies.html]

Proponent:	Xcel Energy, Colorado Springs Utilities, Platte River Power Authority, Public Service Company of New Mexico, Salt River Project, Trans-Elect., Tri-State Generation and Transmission Association, and the Western Area Power Administration.
Location:	Corridor identified in eastern Wyoming and Colorado, eastern and southern New Mexico, and southeastern Arizona
Federal Lands:	Public and National Forest lands in central/southern New Mexico and southeastern Arizona. Equal lengths on Public and National Forests lands.
Type of Line:	Two 345 or 500 kV AC lines transmitting 2,000 – 3,000 MW
Length of Line:	1,200 miles
Project Status:	Feasibility Study completed August 2007. No ROW application filed.

Wyoming-Colorado Intertie Project (formerly TOT3) [www.wyia.org/wci]

Proponent:	Trans-Elect, Wyoming Infrastructure Authority, and Western Area Power Administration (WESTERN)
Location:	Northeast Wyoming to the Denver area
Federal Lands:	Will involve only isolated parcels of public land. Crosses the Thunder Basin National Grassland.
Type of Line:	Construct new and/or upgrade existing lines to accommodate more than 900 MW of new generation from coal and wind energy. Anticipated 500 MW wind plant in vicinity of Wheatland, Wyoming. May tie into High Plains Express Project.
Length of Line:	380 miles
Project Status:	Design, cost, routing, permitting and scheduling studies completed in June 2007. An "Open Season" to define costs and business structure for a FERC-monitored competitive auction of transmission capacity is planned

for January 2008. Project in-service date is 2013. No ROW application filed.

Other Power Line Projects

- **Eastern Plains Transmission Project**: A 500 kV line in Eastern Colorado proposed by Tri-State and WESTERN. [www.wapa.gov/transmission/eptp.htm]

- **Celilo Project**: Proposed by TransCanada. A 500 kV line from Alberta south to the Dalles, Oregon and possibility south to the San Francisco area. [www.transcanada.com/company/northernlights.html]

- **British Columbia – Northern California Project**: Proposed by Pacific Gas and Electric. A 500 kV line from Selkirk, BC to Tracy, CA to transmit 1600 – 3000 MW of renewable energy. Beginning feasibility studies. [www.pge.com/biz/transmission_services/canada/]

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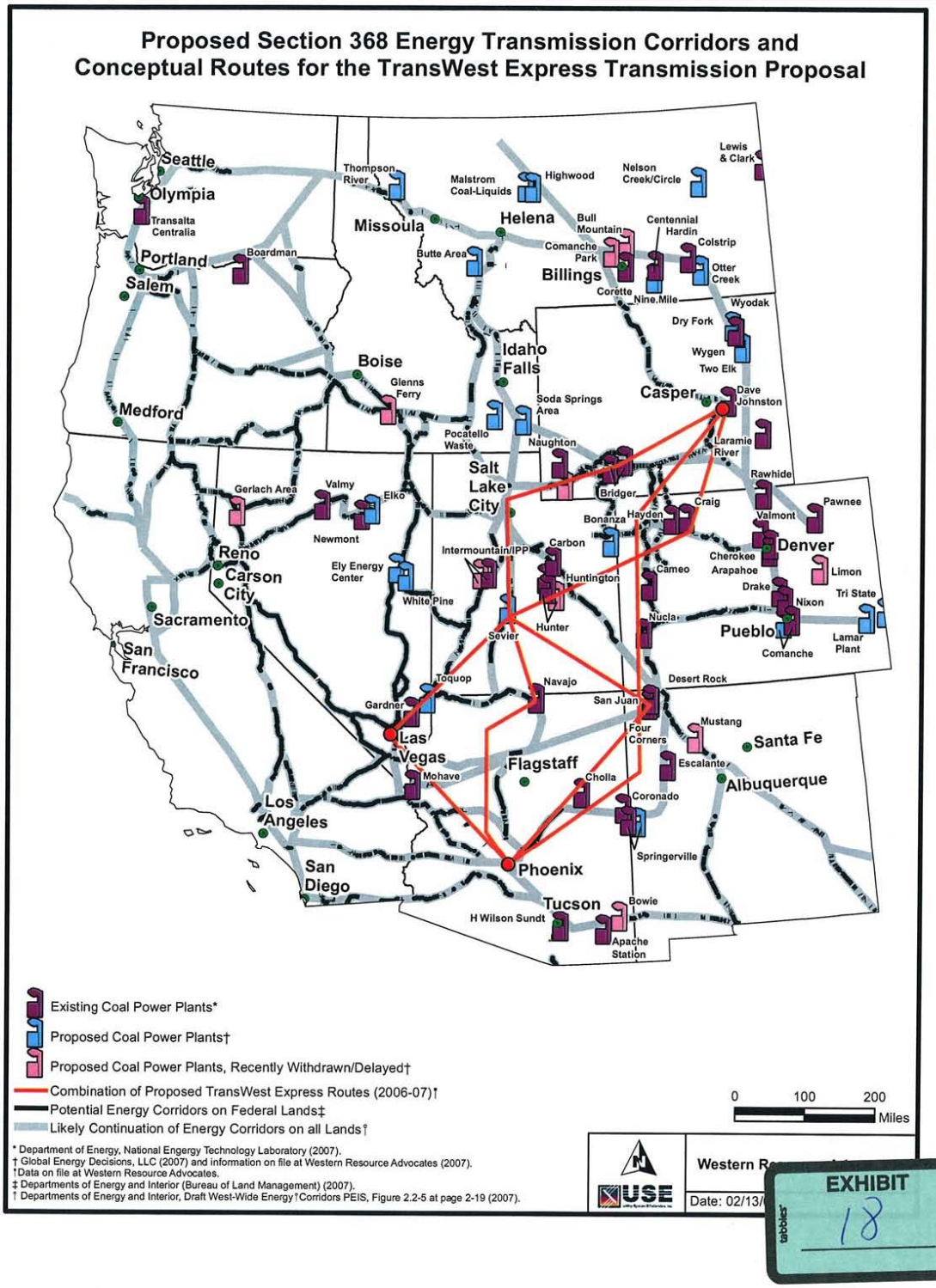
Proposed Section 368 Energy Transmission Corridors and
Conceptual Routes for the TransWest Express Transmission Proposal
Seattle
Olympia
Transalta
Centralia
Portland
Salem
Boardman
Thompson
River
Missoula
Malstrom
Coal-Liquids
Highwood
Helena
Butte Area
Nelson
Creek/Circle
Lewis
& Clark
Bull
Mountain
Centennial
Hardin
Colstrip
Comanche
Park
Billings
Otter
Creek
Corette
Nine Mile
Wyodak
Dry Fork
Wygen
Two Elk
Boise
Glenns
Ferry
Idaho
Falls
Soda Springs
Area
Casper
Dave
Johnston
Medford
Pocatello
Waste
Naughton
Laramie
River
Rawhide
Salt
Lake
City
Bridger
Craig
Hayden
Bonanza
Pawnee
Valmont
Gerlach Area
Valmy
Elko
Newmont
Denver
Reno
Carson
City
Ely Energy
Center
Intermountain/IPP
Carbon
Huntington
Cameo
Cherokee
Arapahoe
Limon
Drake
Tri State
Nixon
White Pine
Nucla
Sacramento
Sevier
Hunter
Pueblo
Comanche
Lamar
Plant
San
Francisco
Toquop
Navajo
Desert Rock
Gardner
San Juan
Four
Corners
Mustang
Las
Vegas
Flagstaff
Escalante
Santa Fe
Mohave
Cholla
Albuquerque
Coronado
Los
Angeles
Springerville
San
Diego
Phoenix
Tucson
Bowie
H Wilson Sundt
Apache
Station
Existing Coal Power Plants*
Proposed Coal Power Plants†
Proposed Coal Power Plants, Recently Withdrawn/Delayed†
Combination of Proposed TransWest Express Routes (2006-07)†
Potential Energy Corridors on Federal Lands‡
Likely Continuation of Energy Corridors on all Lands†
0
100
200
Miles
* Department of Energy, National Engergy Technology Laboratory (2007).
† Global Energy Decisions, LLC (2007) and information on file at Western Resource Advocates (2007).
†Data on file at Western Resource Advocates.
‡ Departments of Energy and Interior (Bureau of Land Management) (2007).
† Departments of Energy and Interior, Draft West-Wide Energy†Corridors PEIS, Figure 2.2-5 at page 2-19 (2007).
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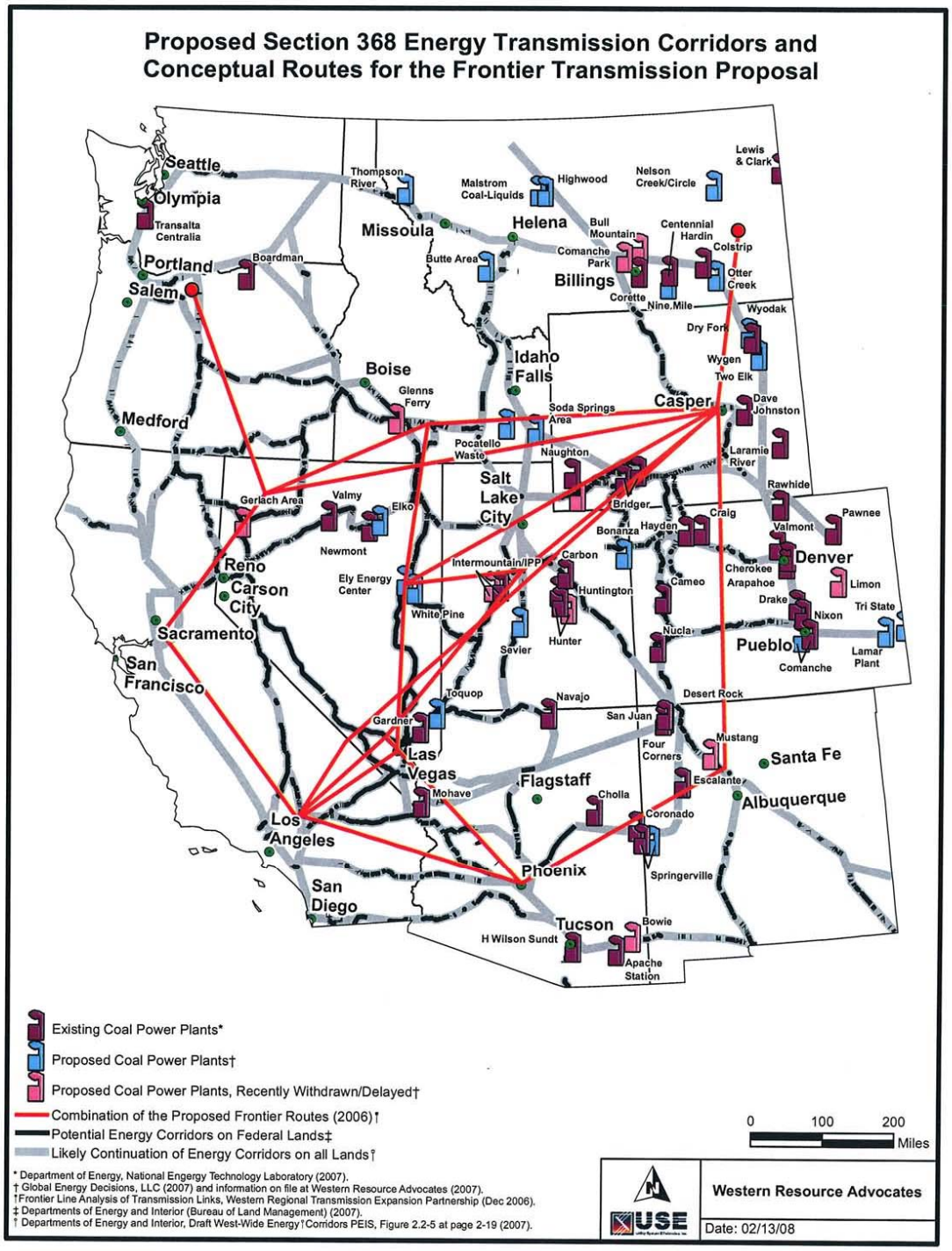
Proposed Section 368 Energy Transmission Corridors and Conceptual Routes for the Frontier Transmission Proposal
Seattle
Olympia
Transalta Centralia
Portland
Salem
Boardman
Thompson River
Missoula
Malstrom Coal-Liquids
Highwood
Helena
Butte Area
Nelson Creek/Circle
Lewis & Clark
Bull Mountain
Centennial Hardin
Colstrip
Comanche Park
Billings
Otter Creek
Corette
Nine Mile
Wyodak
Dry Fork
Wygen
Two Elk
Boise
Glenns Ferry
Idaho Falls
Casper
Dave Johnston
Medford
Soda Springs Area
Pocatello Waste
Naughton
Laramie River
Salt Lake City
Rawhide
Gerlach Area
Valmy
Elko
Bridger
Craig
Pawnee
Bonanza
Hayden
Valmont
Newmont
Denver
Reno
Carson City
Ely Energy Center
Intermountain/IPP
Carbon
Cherokee
Arapahoe
Limon
Huntington
Cameo
Drake
Tri State
White Pine
Nixon
Sacramento
Sevier
Hunter
Nucla
Pueblo
Lamar Plant
San Francisco
Comanche
Toquop
Navajo
Desert Rock
Gardner
San Juan
Four Corners
Mustang
Las Vegas
Flagstaff
Escalante
Santa Fe
Mohave
Cholla
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Los Angeles
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Phoenix
Springerville
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Proposed Coal Power Plants†
Proposed Coal Power Plants, Recently Withdrawn/Delayed†
Combination of the Proposed Frontier Routes (2006)†
Potential Energy Corridors on Federal Lands‡
Likely Continuation of Energy Corridors on all Lands†
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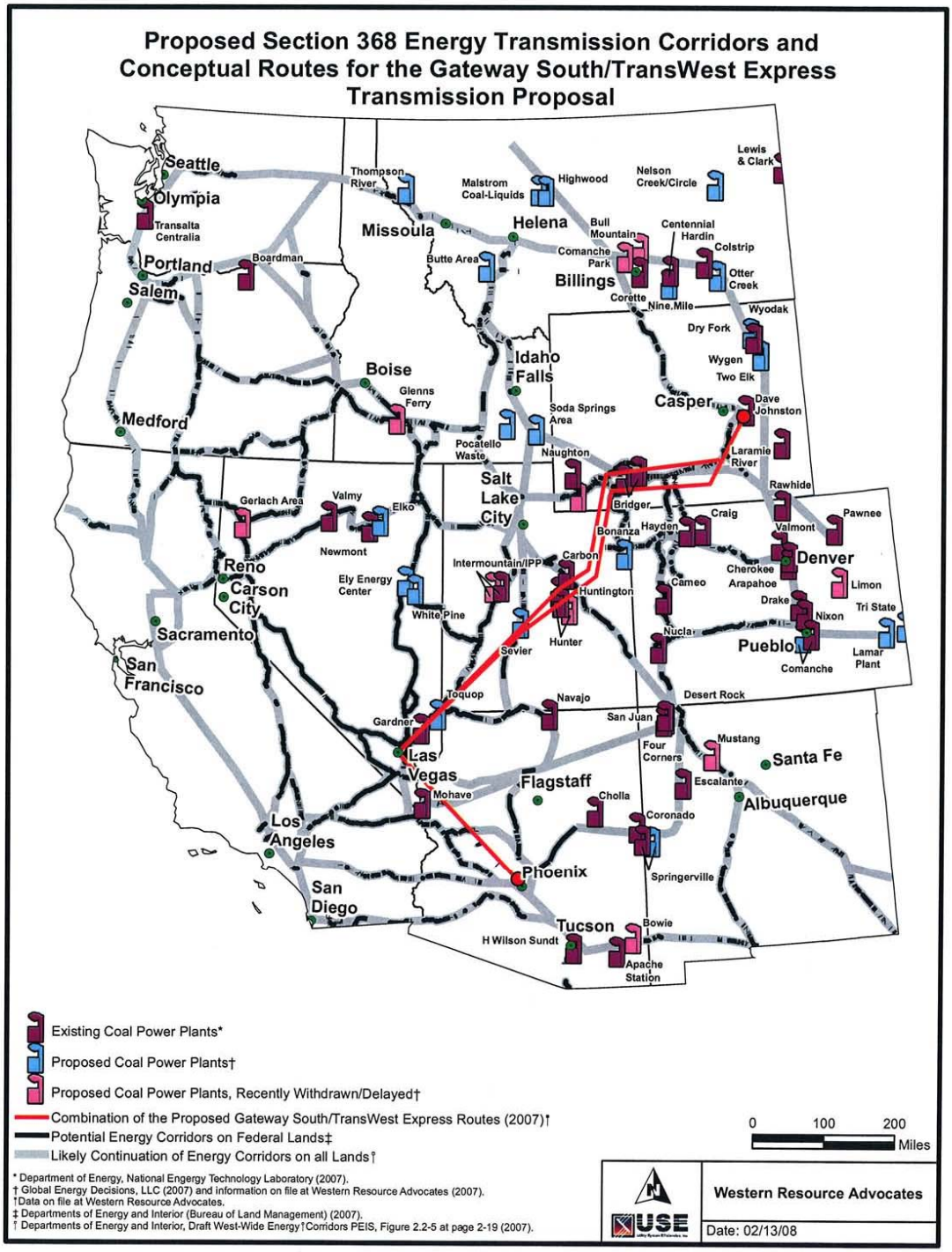
Miles
* Department of Energy, National Engergy Technology Laboratory (2007).
† Global Energy Decisions, LLC (2007) and information on file at Western Resource Advocates (2007).
†Frontier Line Analysis of Transmission Links, Western Regional Transmission Expansion Partnership (Dec 2006).
‡ Departments of Energy and Interior (Bureau of Land Management) (2007).
† Departments of Energy and Interior, Draft West-Wide Energy†Corridors PEIS, Figure 2.2-5 at page 2-19 (2007).
USE
Western Resource Advocates
Date: 02/13/08


Proposed Section 368 Energy Transmission Corridors and Conceptual Routes for the Gateway South/TransWest Express Transmission Proposal
Seattle
Olympia
Transalta Centralia
Portland
Salem
Boardman
Thompson River
Missoula
Malstrom Coal-Liquids
Highwood
Helena
Butte Area
Nelson Creek/Circle
Lewis & Clark
Bull Mountain
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Two Elk
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Idaho Falls
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Casper
Dave Johnston
Medford
Pocatello Waste
Naughton
Laramie River
Salt Lake City
Rawhide
Gerlach Area
Valmy
Elko
Bridger
Craig
Pawnee
Bonanza
Hayden
Valmont
Newmont
Reno
Carson City
Intermountain/IPP
Carbon
Denver
Ely Energy Center
Huntington
Cameo
Cherokee
Arapahoe
Limon
Drake
Tri State
White Pine
Nixon
Sacramento
Sevier
Hunter
Nucla
Pueblo
Lamar Plant
San Francisco
Comanche
Toquop
Navajo
Desert Rock
Gardner
San Juan
Mustang
Four Corners
Las Vegas
Santa Fe
Flagstaff
Escalante
Mohave
Cholla
Albuquerque
Coronado
Los Angeles
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San Diego
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Proposed Coal Power Plants, Recently Withdrawn/Delayed†
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Miles
* Department of Energy, National Engergy Technology Laboratory (2007).
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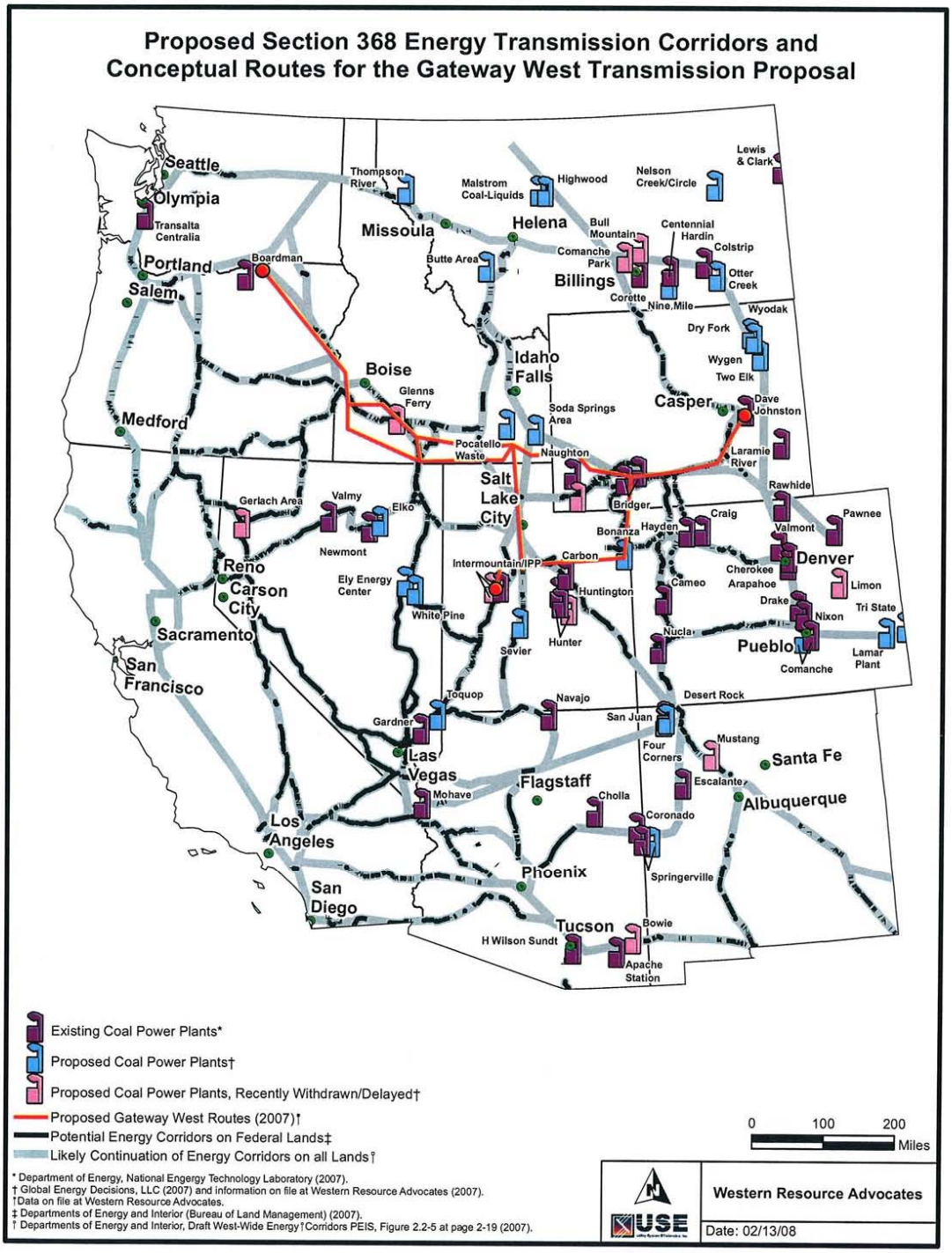
Proposed Section 368 Energy Transmission Corridors and
Conceptual Routes for the Gateway West Transmission Proposal
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Olympia
Transalta
Centralia
Portland
Salem
Boardman
Thompson
River
Missoula
Malstrom
Coal-Liquids
Highwood
Helena
Butte Area
Nelson
Creek/Circle
Lewis
& Clark
Bull
Mountain
Centennial
Hardin
Colstrip
Comanche
Park
Billings
Otter
Creek
Corette
Nine Mile
Wyodak
Dry Fork
Wygen
Two Elk
Boise
Glenns
Ferry
Idaho
Falls
Soda Springs
Area
Casper
Dave
Johnston
Medford
Pocatello
Waste
Naughton
Laramie
River
Salt
Lake
City
Rawhide
Gerlach Area
Valmy
Elko
Newmont
Bridger
Craig
Hayden
Bonanza
Pawnee
Valmont
Denver
Reno
Carson
City
Ely Energy
Center
Intermountain/IPP
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Cherokee
Arapahoe
Cameo
Limon
Drake
Tri State
Nixon
White Pine
Sevier
Hunter
Nucla
Pueblo
Lamar
Plant
Comanche
Sacramento
San
Francisco
Toquop
Navajo
Desert Rock
San Juan
Four
Corners
Gardner
Las
Vegas
Mustang
Santa Fe
Escalante
Flagstaff
Mohave
Cholla
Albuquerque
Coronado
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Springerville
San
Diego
Tucson
Bowie
H Wilson Sundt
Apache
Station
Existing Coal Power Plants*
Proposed Coal Power Plants†
Proposed Coal Power Plants, Recently Withdrawn/Delayed†
Proposed Gateway West Routes (2007)†
Potential Energy Corridors on Federal Lands‡
Likely Continuation of Energy Corridors on all Lands†
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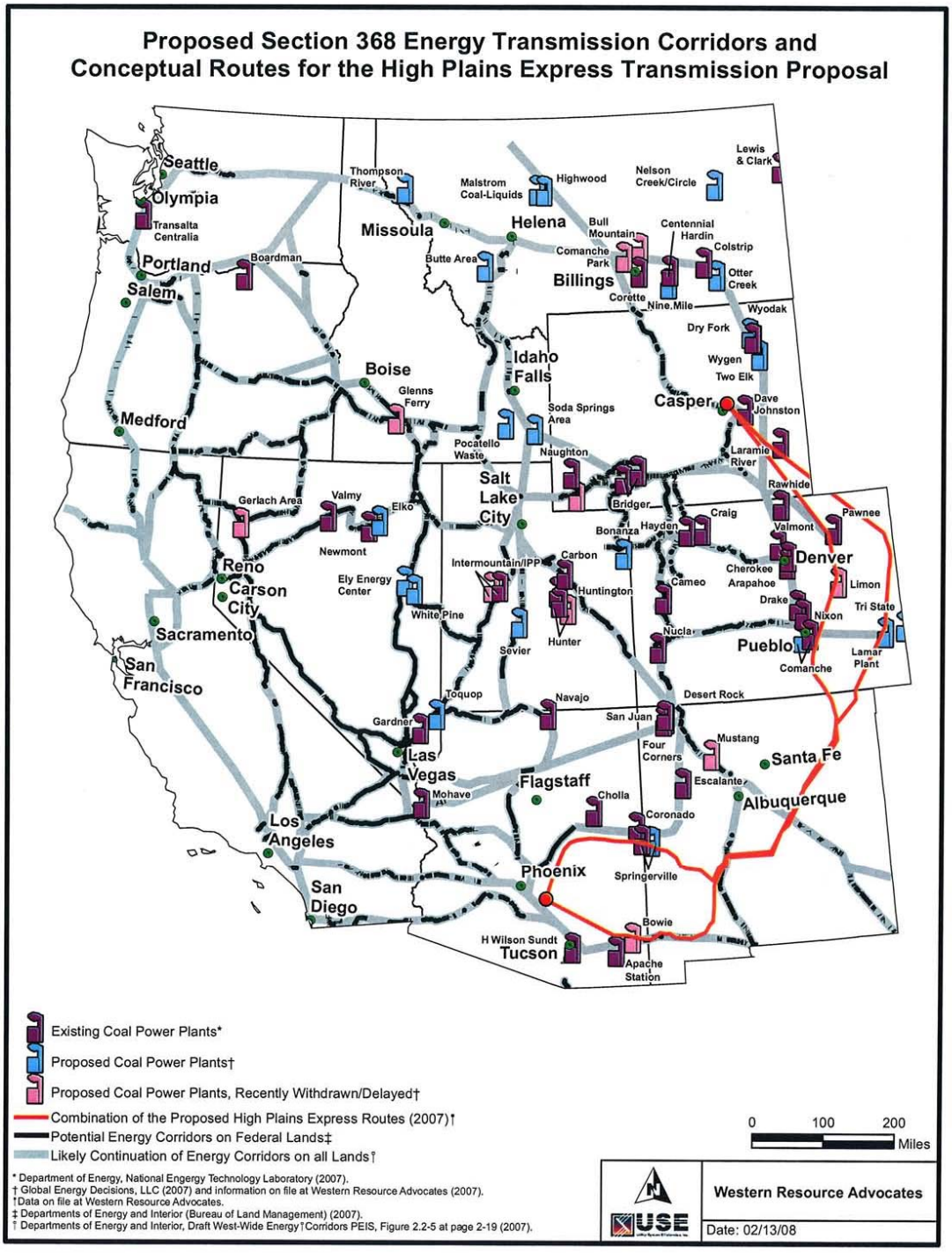
Miles
* Department of Energy, National Engergy Technology Laboratory (2007).
† Global Energy Decisions, LLC (2007) and information on file at Western Resource Advocates (2007).
†Data on file at Western Resource Advocates.
‡ Departments of Energy and Interior (Bureau of Land Management) (2007).
† Departments of Energy and Interior, Draft West-Wide Energy†Corridors PEIS, Figure 2.2-5 at page 2-19 (2007).
Western Resource Advocates
Date: 02/13/08


Proposed Section 368 Energy Transmission Corridors and
Conceptual Routes for the High Plains Express Transmission Proposal
Seattle
Olympia
Transalta
Centralia
Portland
Salem
Boardman
Thompson
River
Missoula
Malstrom
Coal-Liquids
Highwood
Helena
Butte Area
Bull
Mountain
Comanche
Park
Billings
Corette
Centennial
Hardin
Nine Mile
Colstrip
Otter
Creek
Lewis
& Clark
Nelson
Creek/Circle
Wyodak
Dry Fork
Wygen
Two Elk
Casper
Dave
Johnston
Laramie
River
Rawhide
Pawnee
Valmont
Denver
Limon
Tri State
Nixon
Pueblo
Lamar
Plant
Comanche
Cherokee
Arapahoe
Drake
Craig
Hayden
Bonanza
Cameo
Nucla
Desert Rock
Boise
Glenns
Ferry
Medford
Idaho
Falls
Soda Springs
Area
Pocatello
Waste
Naughton
Salt
Lake
City
Bridger
Gerlach Area
Valmy
Elko
Newmont
Reno
Carson
City
Ely Energy
Center
White Pine
Intermountain/IPP
Carbon
Huntington
Hunter
Sevier
Sacramento
San
Francisco
Toquop
Navajo
Gardner
San Juan
Four
Corners
Mustang
Santa Fe
Escalante
Albuquerque
Las
Vegas
Mohave
Flagstaff
Cholla
Coronado
Springerville
Los
Angeles
Phoenix
San
Diego
Bowie
H Wilson Sundt
Tucson
Apache
Station
Existing Coal Power Plants*
Proposed Coal Power Plants†
Proposed Coal Power Plants, Recently Withdrawn/Delayed†
Combination of the Proposed High Plains Express Routes (2007)†
Potential Energy Corridors on Federal Lands‡
Likely Continuation of Energy Corridors on all Lands†
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* Department of Energy, National Engergy Technology Laboratory (2007).
† Global Energy Decisions, LLC (2007) and information on file at Western Resource Advocates (2007).
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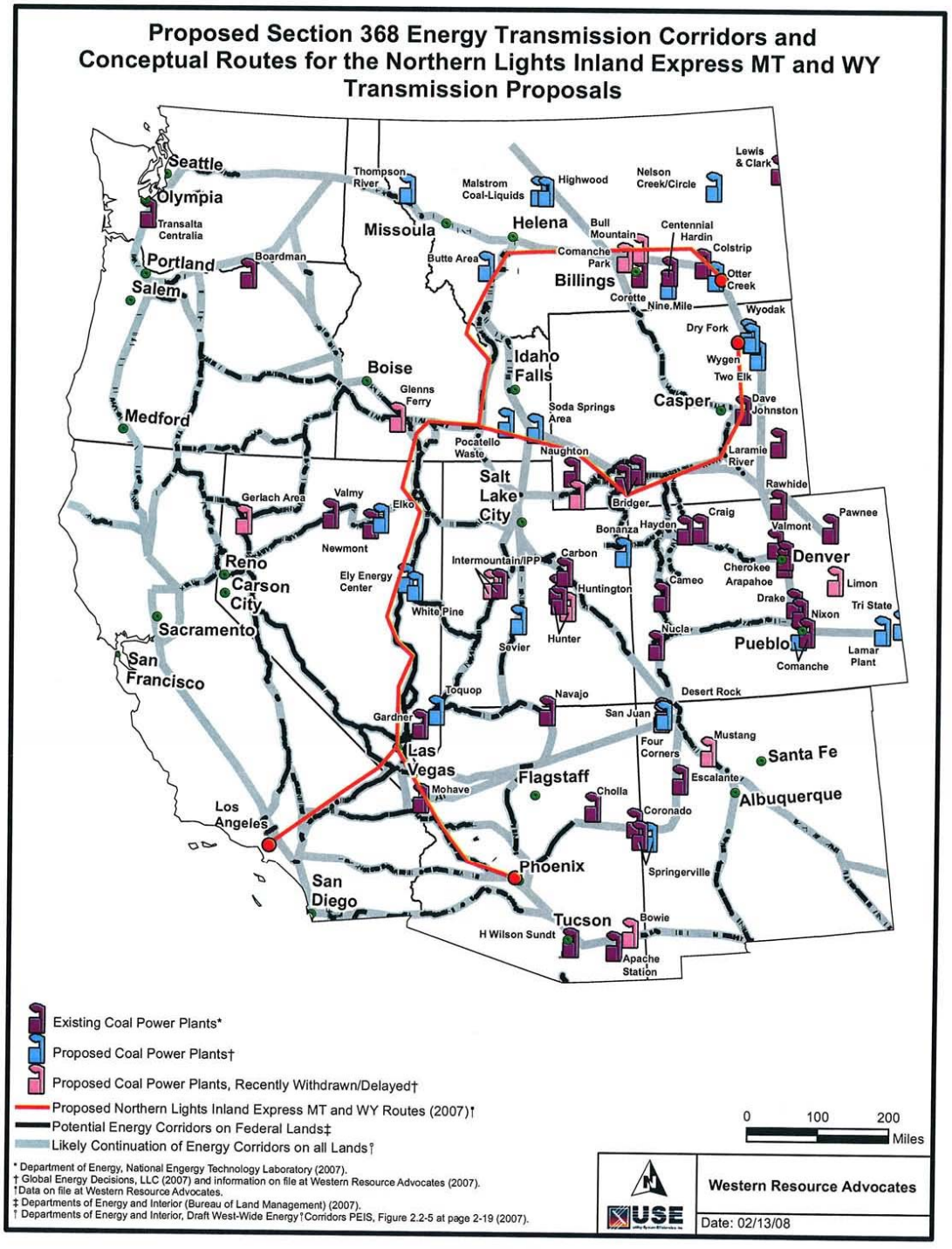
Western Resource Advocates
Date: 02/13/08


Proposed Section 368 Energy Transmission Corridors and Conceptual Routes for the Northern Lights Inland Express MT and WY Transmission Proposals
Seattle
Olympia
Transalta Centralia
Portland
Salem
Boardman
Thompson River
Malstrom Coal-Liquids
Highwood
Nelson Creek/Circle
Lewis & Clark
Missoula
Helena
Bull Mountain
Centennial Hardin
Colstrip
Butte Area
Comanche Park
Billings
Otter Creek
Corette
Nine Mile
Wyodak
Dry Fork
Wygen
Two Elk
Boise
Idaho Falls
Glenns Ferry
Soda Springs Area
Casper
Dave Johnston
Medford
Pocatello Waste
Naughton
Laramie River
Salt Lake City
Rawhide
Gerlach Area
Valmy
Elko
Bridger
Craig
Pawnee
Bonanza
Hayden
Valmont
Newmont
Denver
Reno
Carson City
Ely Energy Center
Intermountain/IPP
Carbon
Cherokee
Arapahoe
Limon
Cameo
Huntington
Drake
Tri State
White Pine
Nixon
Sacramento
Sevier
Hunter
Nucla
Pueblo
Lamar Plant
San Francisco
Comanche
Toquop
Navajo
Desert Rock
Gardner
San Juan
Four Corners
Mustang
Santa Fe
Las Vegas
Flagstaff
Escalante
Albuquerque
Mohave
Cholla
Los Angeles
Coronado
Phoenix
Springerville
San Diego
Tucson
Bowie
H Wilson Sundt
Apache Station
Existing Coal Power Plants*
Proposed Coal Power Plants†
Proposed Coal Power Plants, Recently Withdrawn/Delayed†
Proposed Northern Lights Inland Express MT and WY Routes (2007)†
Potential Energy Corridors on Federal Lands‡
Likely Continuation of Energy Corridors on all Lands†
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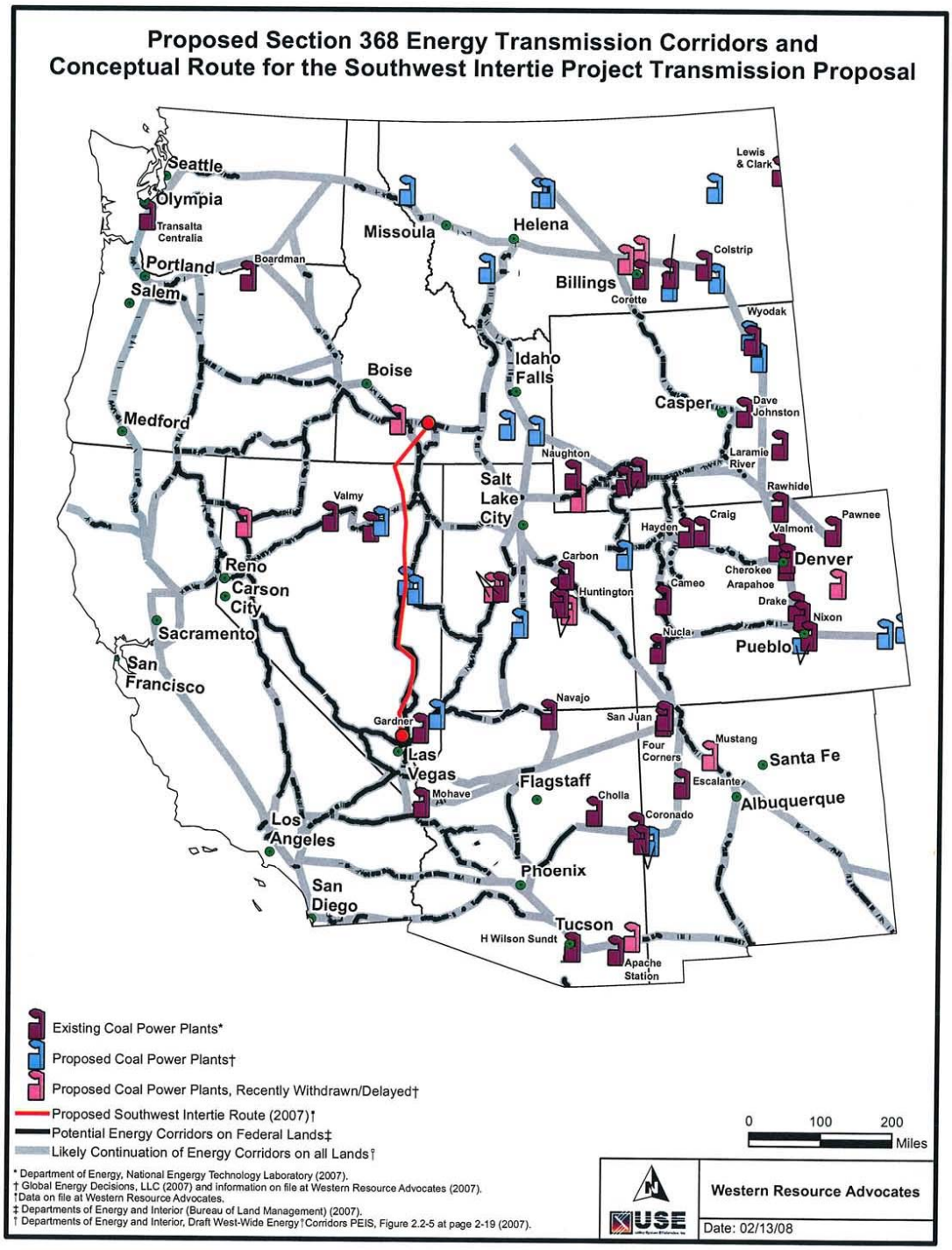
Miles
* Department of Energy, National Energy Technology Laboratory (2007).
† Global Energy Decisions, LLC (2007) and information on file at Western Resource Advocates (2007).
†Data on file at Western Resource Advocates.
‡ Departments of Energy and Interior (Bureau of Land Management) (2007).
† Departments of Energy and Interior, Draft West-Wide Energy†Corridors PEIS, Figure 2.2-5 at page 2-19 (2007).
Western Resource Advocates
Date: 02/13/08


Proposed Section 368 Energy Transmission Corridors and
Conceptual Route for the Southwest Intertie Project Transmission Proposal
Seattle
Olympia
Transalta
Centralia
Portland
Boardman
Salem
Missoula
Helena
Lewis
& Clark
Billings
Colstrip
Corette
Wyodak
Boise
Idaho
Falls
Medford
Casper
Dave
Johnston
Naughton
Laramie
River
Salt
Lake
City
Rawhide
Valmy
Craig
Hayden
Pawnee
Valmont
Denver
Carbon
Cherokee
Arapahoe
Cameo
Huntington
Drake
Nixon
Reno
Carson
City
Sacramento
Nucla
Pueblo
San
Francisco
Navajo
San Juan
Gardner
Four
Corners
Mustang
Santa Fe
Las
Vegas
Flagstaff
Escalante
Mohave
Cholla
Albuquerque
Coronado
Los
Angeles
Phoenix
San
Diego
Tucson
H Wilson Sundt
Apache
Station
Existing Coal Power Plants*
Proposed Coal Power Plants†
Proposed Coal Power Plants, Recently Withdrawn/Delayed†
Proposed Southwest Intertie Route (2007)†
Potential Energy Corridors on Federal Lands‡
Likely Continuation of Energy Corridors on all Lands†
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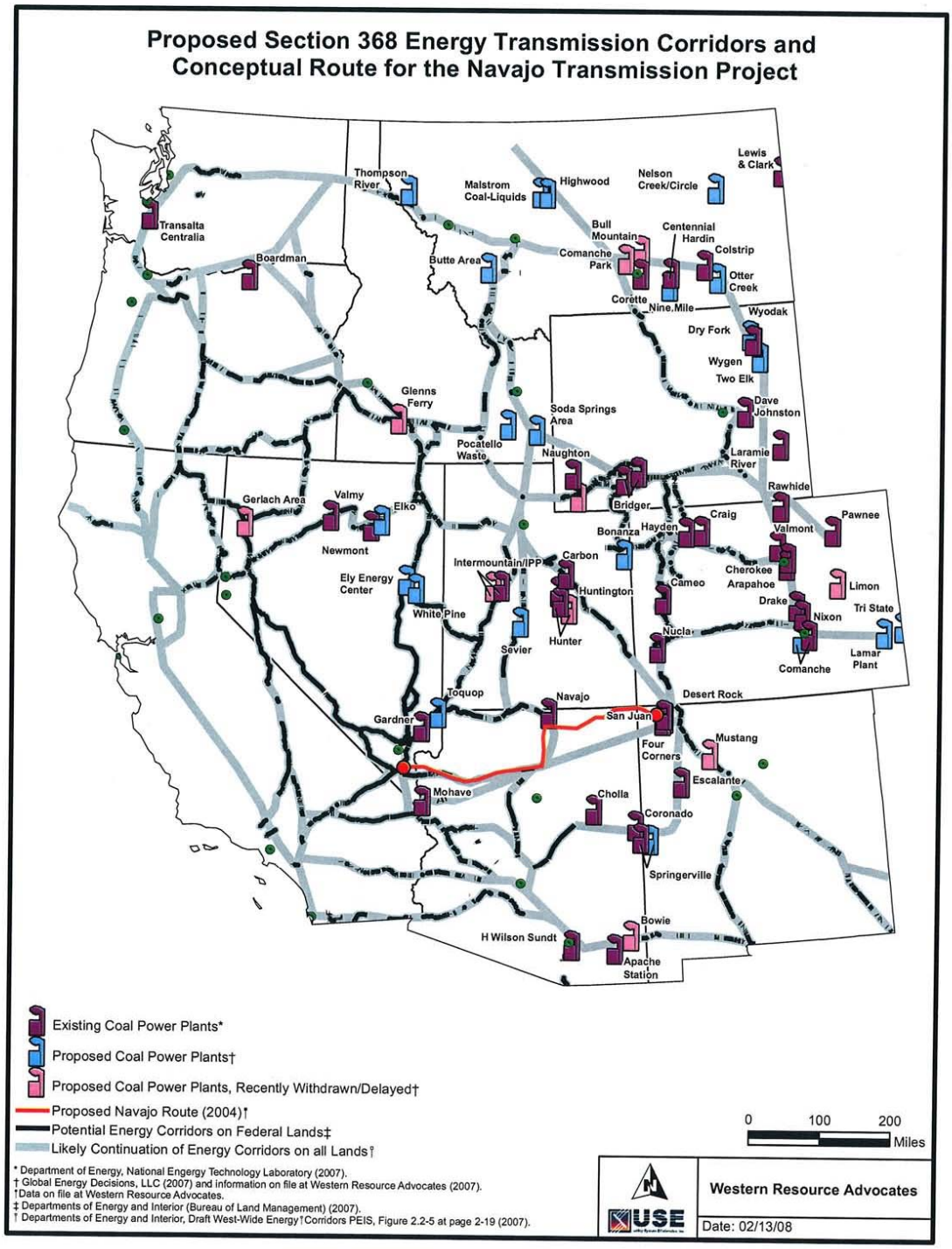
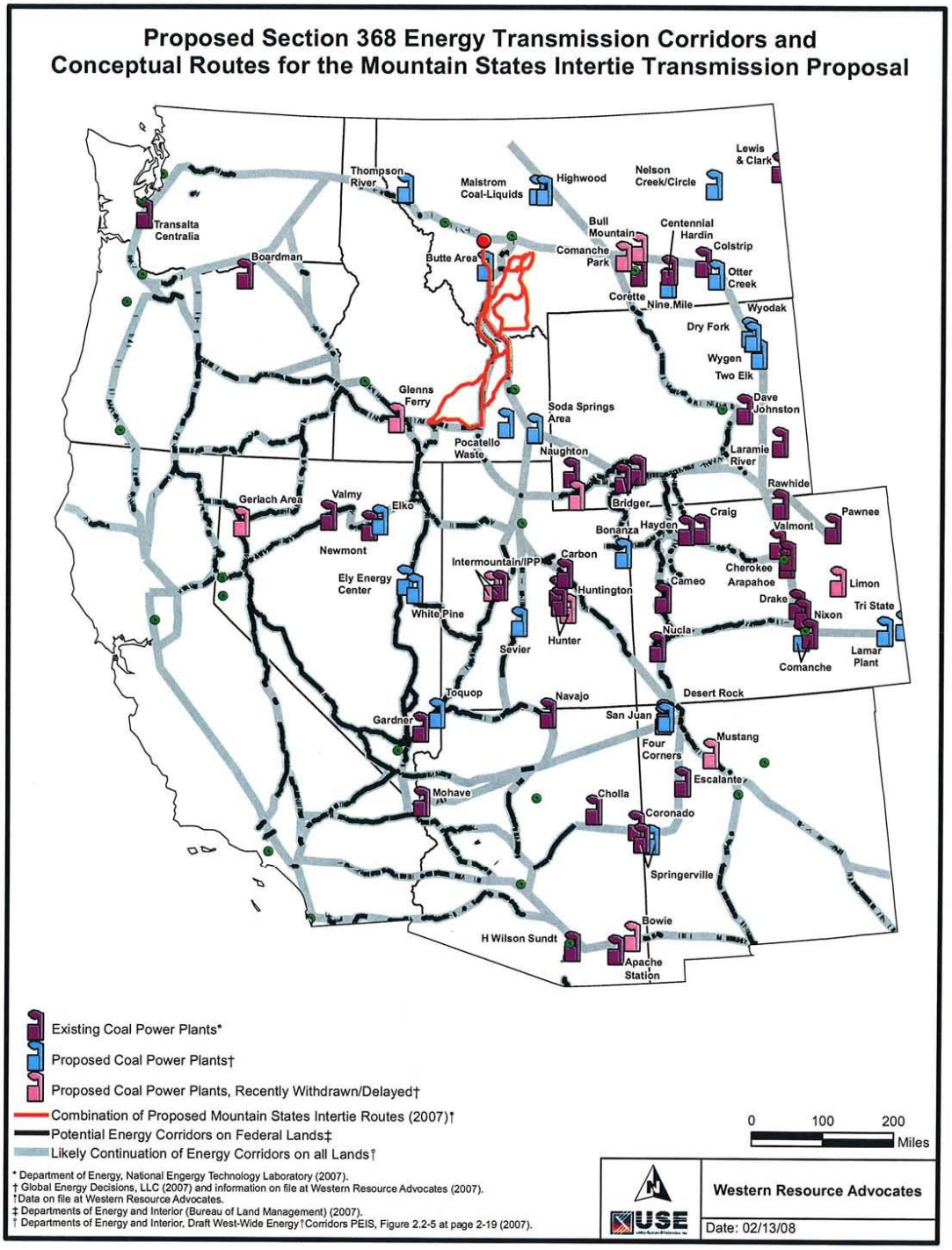
Miles
* Department of Energy, National Energy Technology Laboratory (2007).
† Global Energy Decisions, LLC (2007) and information on file at Western Resource Advocates (2007).
†Data on file at Western Resource Advocates.
‡ Departments of Energy and Interior (Bureau of Land Management) (2007).
† Departments of Energy and Interior, Draft West-Wide Energy†Corridors PEIS, Figure 2.2-5 at page 2-19 (2007).
Western Resource Advocates
Date: 02/13/08


Proposed Section 368 Energy Transmission Corridors and Conceptual Route for the Navajo Transmission Project
Thompson River
Malstrom Coal-Liquids
Highwood
Nelson Creek/Circle
Lewis & Clark
Transalta Centralia
Boardman
Butte Area
Bull Mountain
Comanche Park
Centennial Hardin
Colstrip
Otter Creek
Corette
Nine Mile
Wyodak
Dry Fork
Wygen
Two Elk
Glenns Ferry
Soda Springs Area
Pocatello Waste
Naughton
Dave Johnston
Laramie River
Rawhide
Gerlach Area
Valmy
Elko
Newmont
Bridger
Craig
Hayden
Bonanza
Pawnee
Valmont
Intermountain/IPP
Carbon
Ely Energy Center
Huntington
Cameo
Cherokee
Arapahoe
Limon
Drake
Nixon
Tri State
White Pine
Sevier
Hunter
Nucla
Comanche
Lamar Plant
Toquop
Navajo
Desert Rock
Gardner
San Juan
Four Corners
Mustang
Escalante
Mohave
Cholla
Coronado
Springerville
H Wilson Sundt
Bowie
Apache Station
Existing Coal Power Plants*
Proposed Coal Power Plants†
Proposed Coal Power Plants, Recently Withdrawn/Delayed†
Proposed Navajo Route (2004)†
Potential Energy Corridors on Federal Lands‡
Likely Continuation of Energy Corridors on all Lands†
0 100 200
Miles
* Department of Energy, National Engergy Technology Laboratory (2007).
† Global Energy Decisions, LLC (2007) and information on file at Western Resource Advocates (2007).
†Data on file at Western Resource Advocates.
‡ Departments of Energy and Interior (Bureau of Land Management) (2007).
† Departments of Energy and Interior, Draft West-Wide Energy†Corridors PEIS, Figure 2.2-5 at page 2-19 (2007).
Western Resource Advocates
Date: 02/13/08


Proposed Section 368 Energy Transmission Corridors and
Conceptual Routes for the Mountain States Intertie Transmission Proposal
Thompson River
Malstrom Coal-Liquids
Highwood
Nelson Creek/Circle
Lewis & Clark
Transalta Centralia
Boardman
Butte Area
Bull Mountain
Centennial Hardin
Colstrip
Comanche Park
Otter Creek
Corette
Nine Mile
Wyodak
Dry Fork
Wygen
Two Elk
Glenns Ferry
Soda Springs Area
Pocatello Waste
Naughton
Dave Johnston
Laramie River
Rawhide
Gerlach Area
Valmy
Elko
Bridger
Craig
Pawnee
Bonanza
Hayden
Valmont
Newmont
Intermountain/IPP
Carbon
Cherokee
Arapahoe
Limon
Ely Energy Center
Huntington
Cameo
Drake
Tri State
White Pine
Nixon
Sevier
Hunter
Nucla
Lamar Plant
Comanche
Toquop
Navajo
Desert Rock
Gardner
San Juan
Four Corners
Mustang
Escalante
Mohave
Cholla
Coronado
Springerville
Bowie
H Wilson Sundt
Apache Station
Existing Coal Power Plants*
Proposed Coal Power Plants†
Proposed Coal Power Plants, Recently Withdrawn/Delayed†
Combination of Proposed Mountain States Intertie Routes (2007)†
Potential Energy Corridors on Federal Lands‡
Likely Continuation of Energy Corridors on all Lands†
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Miles
* Department of Energy, National Engergy Technology Laboratory (2007).
† Global Energy Decisions, LLC (2007) and information on file at Western Resource Advocates (2007).
†Data on file at Western Resource Advocates.
‡ Departments of Energy and Interior (Bureau of Land Management) (2007).
† Departments of Energy and Interior, Draft West-Wide Energy†Corridors PEIS, Figure 2.2-5 at page 2-19 (2007).
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Western Resource Advocates
Date: 02/13/08

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N
© 2007 Tele Atlas
Pointer 46°13'49.39" N 112°18'22.01" W elev 6915 ft Streaming 100%
394 ft


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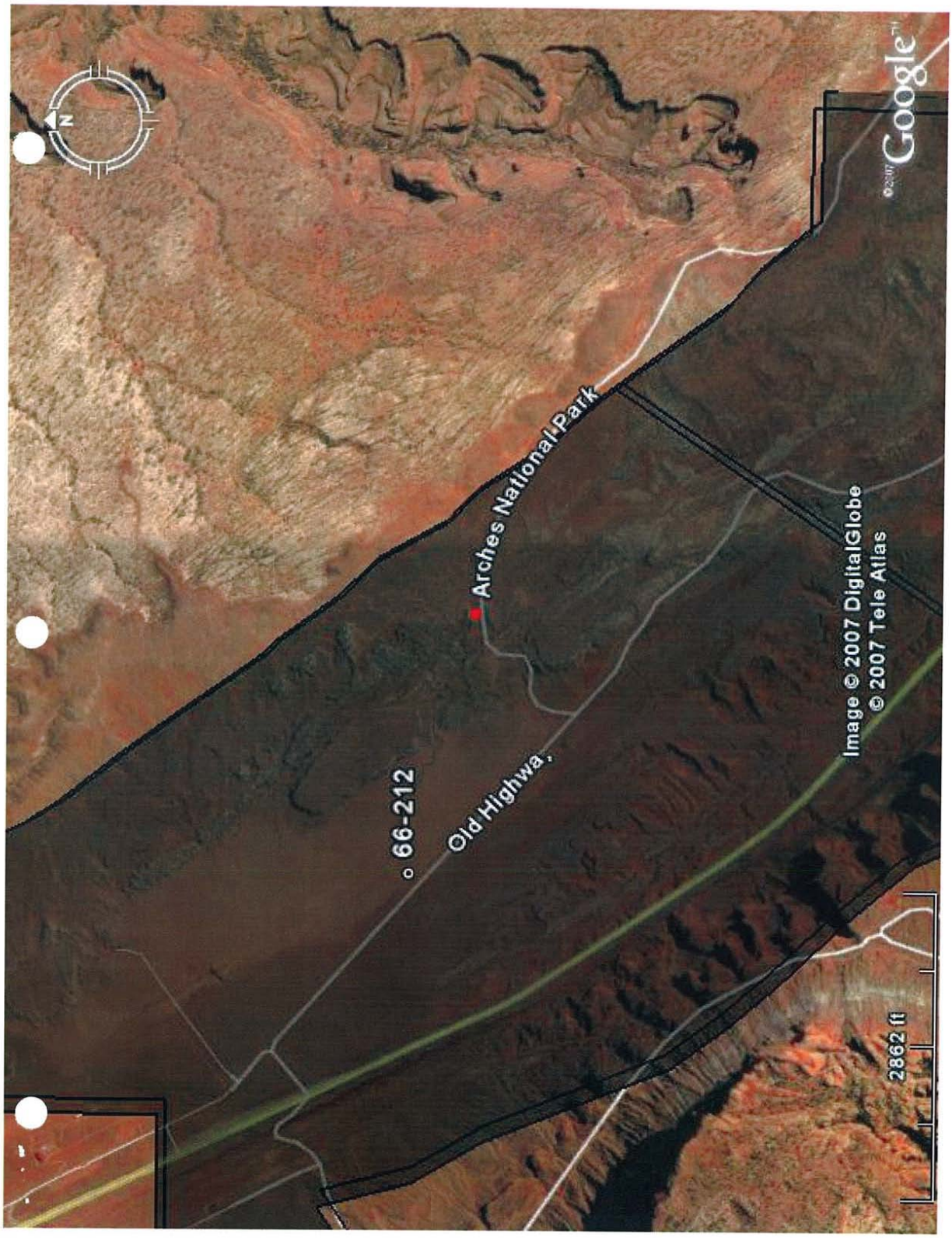
51-204
© 2007 Tele Atlas
© 2007 Europa Technologies
©2007 Google™
Pointer 46°13'49.39" N 112°18'22.01" W elev 6915 ft Streaming 100%
4208 ft
Eye alt 20400 ft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Arches National Park
66-212
Old Highwa
Image © 2007 DigitalGlobe
© 2007 Tele Atlas
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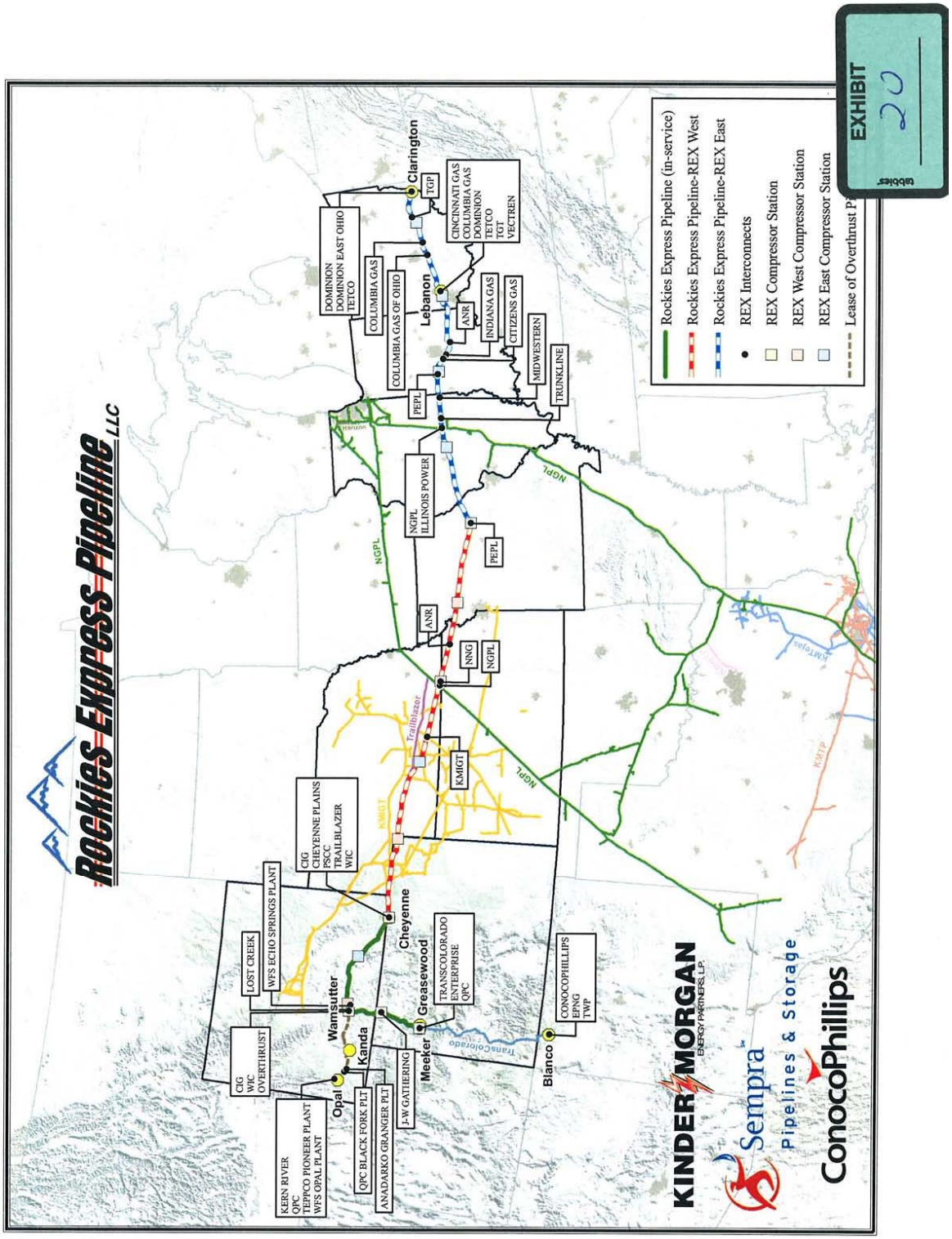
Rockies Express Pipeline LLC
Rockies Express Pipeline (in-service)
Rockies Express Pipeline-REX West
Rockies Express Pipeline-REX East
REX Interconnects
REX Compressor Station
REX West Compressor Station
REX East Compressor Station
Lease of Overthrust P
Clarington
Lebanon
Cheyenne
Greasewood
Meeker
Kanda
Opal
Wamsutter
Blanco
TGP
DOMINION
DOMINION EAST OHIO
TETCO
COLUMBIA GAS
COLUMBIA GAS OF OHIO
CINCINNATI GAS
COLUMBIA GAS
DOMINION
TETCO
TGT
VECTREN
PEPL
ANR
INDIANA GAS
CITIZENS GAS
MIDWESTERN
TRUNKLINE
NGPL
ILLINOIS POWER
NNG
KMIGT
Trailblazer
CIG
CHEYENNE PLAINS
PSCC
TRAILBLAZER
WIC
LOST CREEK
WFS ECHO SPRINGS PLANT
CIG
WIC
OVERTHRUST
KERN RIVER
QPC
TEPPCO PIONEER PLANT
WFS OPAL PLANT
QPC BLACK FORK PLT
ANADARKO GRANGER PLT
I-W GATHERING
TRANSCOLORADO
ENTERPRISE
QPC
CONOCOPHILLIPS
EPNG
TWP
TransColorado
KMTP
KINDER MORGAN
ENERGY PARTNERS, L.P.
Sempra
Pipelines & Storage
ConocoPhillips
EXHIBIT
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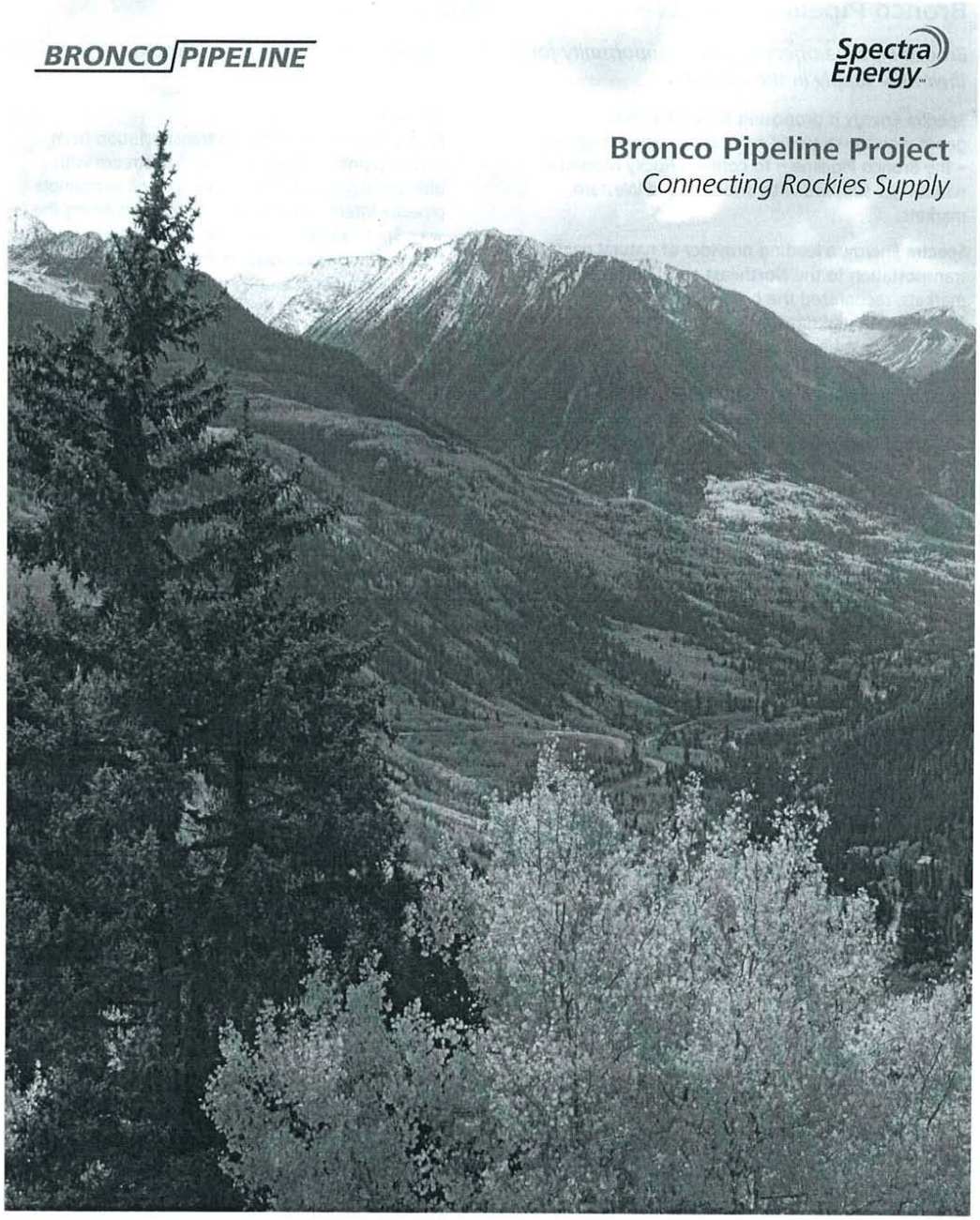


Non-binding Open Season Notice
January 10, 2008 – F

EXHIBIT
21

Bronco Pipeline Project – Connecting Rockies Supply

Bronco Pipeline offers a unique opportunity for Rockies suppliers of natural gas to strategically position their new supply in the market.

Spectra Energy is proposing to build a new geographically strategic natural gas pipeline system – the Bronco Pipeline – to connect Rocky Mountain natural gas supplies with under-served Western markets.

Spectra Energy, a leading provider of natural gas transportation to the Northeast and Southeast markets, recognized the potential for Rocky Mountain natural gas to move west as an alternative to current east-bound projects. Bronco Pipeline represents Spectra Energy's initial response to this need by providing an efficient means to direct Rockies supply into the Western market areas. Spectra Energy is now holding this Non-binding Open Season and invites parties interested in obtaining firm capacity on the proposed Bronco Pipeline to submit a Non-binding Nomination Form. Service commencement for the Bronco Pipeline Project completion is targeted for no later than November 1, 2011.

Bronco Pipeline

The successful development of Rockies production has increased the supply of natural gas for growing domestic markets. While some Rockies producers have been able to commit to transporting a significant quantity of natural gas towards the Northeast market area, the Western markets and the continued demand for clean-burning natural gas to fuel growth in the Pacific Northwest and California markets provide the opportunity for an important new outlet for Rockies production to reach these key markets.

The proposed Bronco Pipeline positions Spectra Energy as a new competitor bringing critical supply outlets to the growing Rockies' production regions and attaching to strong western markets with increasing natural gas needs. Spectra Energy has a proven history of developing critical new natural gas infrastructure projects across North America, connecting diverse supplies with growing markets.

Bronco Pipeline will allow producers and other shippers to transport gas to Malin, Ore., at the California/Oregon border. This path offers producers and shippers access to key transportation and storage markets, and will allow this new source of supply to move throughout the Western Market via existing infrastructure.

Project Description

Bronco Pipeline will provide transportation from receipt points at Opal, Wyo. and upstream with ultimate delivery to Malin, Ore. as well as multiple pipeline interconnects and new markets along the way. Spectra Energy has been working with existing transportation providers so that potential shippers will also have the opportunity to indicate receipt points upstream of Opal as desired. Bronco Pipeline will have an initial capacity of over 1 billion cubic feet (Bcf).

Project Rates

Rates will be determined at the conclusion of the Non-binding Open Season and are dependent upon the scope and final facilities required to satisfy the firm service requests for shippers who are awarded capacity. Shippers will have the ability to choose to pay the applicable recourse rates for service on Bronco Pipeline or to pay a negotiated rate. It is anticipated that the project as defined will have a reservation rate for firm service of $0.9880/Dth for delivery to Malin, Ore. In addition to the transportation rate, any shipper who is awarded capacity will also be required to pay the applicable fuel charges, that are anticipated to be 1.0%.

Non-binding Nomination Process

During the Open Season period, which begins at 8:00 a.m., CST, Thursday, January 10, and concludes at 5:00 p.m., CST, on Friday, February 8, 2008, interested parties must submit a Non-binding Nomination Form, which specifies the Maximum Daily Quantity (MDQ), contract term (10-year minimum required), and the receipt and delivery points required, as well as comments on the form precedent agreement for the project. The form precedent agreement for the project – along with this document – will be posted on www.broncopipeline.com on or before January 10. The completed Non-binding Nomination Form must be executed by a duly authorized representative and mailed or faxed, along with comments on the form precedent agreement, to Dave Weathers at Spectra Energy, P.O. Box 1642, Houston, TX 77251-1642. The facsimile number is (713) 989-1613. Spectra Energy reserves the right to reject any Non-binding Nomination Form that is not received on or before 5:00 p.m. CST, on Friday, February 8, 2008.

Contracting for Service

Upon the close of the Open Season, Spectra Energy will evaluate all valid requests for service as set forth in the Non-binding Nomination Forms to determine if the proposed Bronco Pipeline Project is economically justified. If Spectra Energy elects to proceed with the project, Spectra Energy representatives will contact all parties who have submitted valid requests in order to finalize the desired terms of service.

Any party who is awarded capacity is expected to enter into negotiations with the goal of executing a binding precedent agreement. Spectra Energy reserves the right to reject any party's valid request for service in the event a duly authorized representative of such party has not executed a binding precedent agreement on or before April 30, 2008.

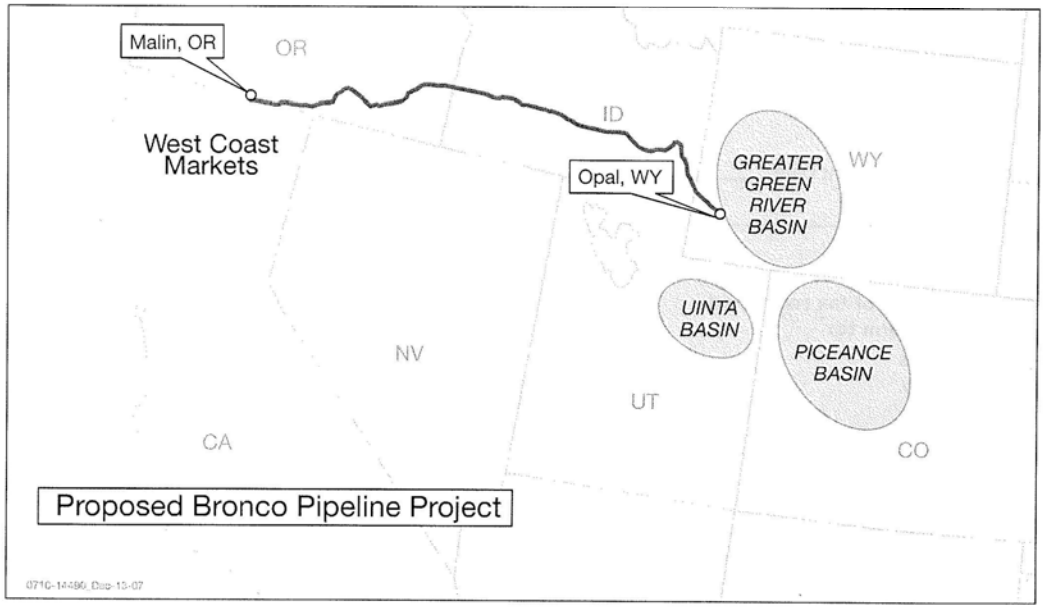
Limitations and Reservations

Spectra Energy reserves the right, in its sole discretion, to decline to proceed with the Bronco Pipeline Project. Spectra Energy also reserves the right to reject any and all bids that do not satisfy the requirements set forth in this Non-binding Open Season Notice. Without limiting the foregoing, Spectra Energy may, but is not required to, reject any request for service in which the Non-binding Nomination Form is incomplete, is inconsistent with the terms and conditions outlined in this Open Season Notice, contains additional or modified terms, or is otherwise deficient in any respect. Spectra Energy also reserves the right to reject requests for service in the event requesting parties are unable to meet applicable creditworthiness requirements. No request for service shall be binding on Spectra Energy unless and until duly authorized representatives of both a requesting party and Spectra Energy have executed binding Precedent Agreements.

Communications

Interested parties may contact Dave Weathers at (713) 627-4773 or via email at daweathers@spectraenergy.com to ask questions or seek additional information about this Open Season.

Spectra Energy Corp (NYSE: SE) is one of North America's premier natural gas infrastructure companies serving three key links in the natural gas value chain: gathering and processing, transmission and storage and distribution. For close to a century, Spectra Energy and its predecessor companies have developed critically important pipelines and related energy infrastructure connecting natural gas supply sources to premium markets. Based in Houston, Texas, the company operates in the United States and Canada approximately 17,500 miles of transmission pipeline, 265 billion cubic feet of storage, natural gas gathering and processing, natural gas liquids operations and local distribution assets. Spectra Energy Corp also has a 50 percent ownership in DCP Midstream, one of the largest natural gas gatherers and processors in the United States.



Bronco Pipeline Project Open Season

Non-binding Nomination Form
Spectra Energy

Shipper Information

Company _____

Contact _____

Title _____

Address _____

Telephone _____ Fax _____

E-mail _____

Receipt Point	Quantity (Dth/d)	Delivery Point	Quantity (Dth/d)
Opal, Wyo.	_____	PGE Malin, Ore.	_____
Meeker, Colo.	_____	Paiute Pipeline	_____
Wamsutter, Wyo.	_____	Tuscarora Pipeline	_____
Other		GTN	_____
_____	_____	NWPL	_____
_____	_____	Other	
		_____	_____
		_____	_____

Service Commencement Date _____

Contract Term _____

Please mail and/or fax completed Nomination Form to:

Dave Weathers
Spectra Energy
P.O. Box 1642
Houston, TX 77251-1642

(713) 989-1613 *fax*
(713) 627-4773 *phone*
daweathers@spectraenergy.com *email*

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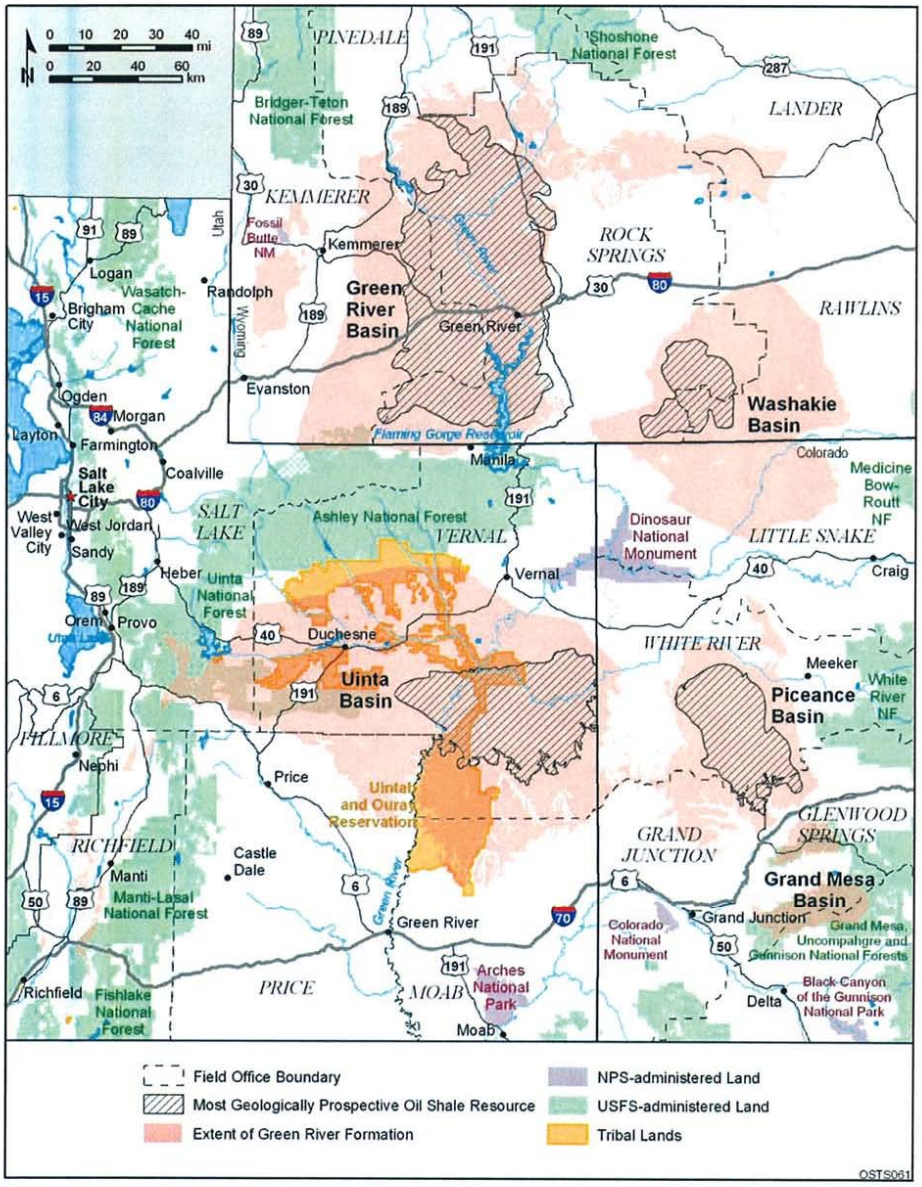

FIGURE 1.2-1 Most Geologically Prospective Oil Shale Resources within the Green River Formation Basins in Colorado, Utah, and Wyoming

EXHIBIT
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22

WEC_00101

LAS VEGAS SUN

We all need power, but in Mesquite, priority is clean air

By *Phoebe Sweet*

Thu, Feb 7, 2008 (2 a.m.)

Sun Archives
Coal plant debate intensifies (1-23-2008)
Editorial: Another foe of coal (1-17-2008)
'Clean' coal sounds prettier than it smells (8-25-2007)
Beyond the Sun
Download state air permit applications for the Toquop power plant
Toquop
Stop Toquop
Sierra Club - Coal
HowStuffWorks - Energy Production

Hundreds of people are expected to rally tonight at Mesquite City Hall in opposition to construction of a coal-fired power plant in nearby Lincoln County, in the latest showdown over Nevada's energy future.

Coal-fired power developers argue that the increasing energy demands of growing Nevada and the rest of the Southwest make more of their plants necessary.

On the other side, scientists and environmentalists clamor over global warming and down-winders worry over health effects from pollution. These same battles have led to the abandonment, postponement or regulatory denial of dozens of coal-fired plants in other states.

Mesquite resident Linda Faas is hoping to see a similar outcome in Nevada.

"This is absolutely the biggest issue that faces Mesquite, and my future," said the retiree who does volunteer work for Defend Our Desert.

"We're a resort town populated by a high percentage of seniors who want clean air — they need clean air."

But no matter how many opponents demonstrate against the plant, proposed for a site about 12 miles northwest of Mesquite and about 80 miles northwest of Las Vegas, no matter how vehemently they argue that climate change, cancer and haze are the products of coal-fired power, it may not matter to the state.

Tonight's protest is to precede a Nevada Environmental Protection Division hearing on the draft air permit for the 750-megawatt Toquop Energy Project. The division, which regulates pollutants such as sulfur and nitrogen, will take public comments tonight.

The plant's developers say it will meet state and federal requirements, according to division spokesman Dante Pistone.

"Do the proposed emissions from this plant meet all current state and federal air quality standards? That's the question we have to deal with," Pistone said.

Global warming-causing carbon dioxide emissions aren't regulated by Nevada or the federal government. Although division officials have said they have the right to regulate them, they have also said it will take at least a year or two to write the regulations.

A lack of such regulations didn't stop Kansas from denying permits last year, but that kind of political will is absent in Nevada.

Toquop will emit almost 6 million tons of carbon dioxide each year. The plant will produce about the same amount of carbon per megawatt hour of electricity produced as the Mohave Generating Station, according to the Toquop project's Web site. The Mohave station, partly owned by Nevada Power Co., was shut down for pollution violations in 2005.

There is no commercially available technology to reduce carbon emissions, aside from burning coal more efficiently, according to developers.

The plant will also emit more than 1,200 tons of sulfur dioxide, 1,600 tons of nitrogen oxide and 900 tons of particulates a year, all regulated by a state air permit.

Frank Maisano of the Washington law firm Bracewell & Giuliani, a spokesman for plant developer Sithe Global, said the plant will be one of the cleanest in the nation. It was originally approved by the state and the federal government as an 1,100-megawatt natural gas-fired plant, but Sithe abandoned those plans because of the volatile price of the fuel.

Although Toquop will provide only 70 percent of the energy of the originally planned plant, the coal version will have more emissions.

Twenty-three environmental groups and two Indian tribes have filed comments with the federal Bureau of Land Management, which owns the land where the plant would be located, opposing the plant. Those groups plan to submit comments to the state regarding the draft air permit, too.

Mayor Susan M. Holecheck and the Mesquite City Council also oppose the plant. Holecheck said Toquop would be only 12 miles from Mesquite, which is in Clark County, but the plant would be in Lincoln County, which would get the tax benefits.

But developers and Lincoln County Commission Chairwoman Ronda Hornbeck say Mesquite will benefit economically from the plant, too.

Maisano said one advantage of building new coal plants, in addition to meeting the growing energy demand in the Southwest, is to replace older, less efficient and more polluting coal plants.

It remains unclear who will buy the power from the Toquop plant. Sithe is a merchant power developer, which means it is not owned by a utility and will sell the power on the open market.

Tom Johns, senior vice president of development for Sithe, said the company cannot enter into long-term contracts with utilities such as Nevada Power Co. until it has state and federal approval to build the plant. But he said the plant is likely to sell power to utilities in Southern Nevada and Arizona and to rural electric cooperatives that power much of eastern Nevada.

Sithe plans to pump water to the site from a nearby well and build a 30-mile rail spur from Union

Pacific's main line. The plant would use about 8 million tons of coal each year.

Holecheck has urged developers to move the plant closer to the railroad. But the company chose its site in part because it is near roads and has access to both a natural gas pipeline to supply its boiler igniters and transmission lines to get its power to the grid, Johns said. It would be much more expensive to build elsewhere, he said.

The plant would use a maximum of 2,500 acre-feet of water a year, he said, but the state engineer has permitted only 2,100. Johns said the plant would be designed to operate with only 2,100 acre-feet if the additional 400 aren't approved. And the plant could use municipal ground water from a planned residential development in the future, he added.

The U.S. Environmental Protection Agency has expressed concern about the plant's effect on ground-water resources and wildlife. The agency's comments to the Bureau of Land Management, which issued a draft environmental review of the project last year, included concern about the amount of greenhouse gases the plant will emit. Not building the plant would be equivalent to removing 1.4 million cars from the roads, the comments said.

The EPA, like environmentalists and local opposition groups, also urges Sithe to consider developing wind, geothermal or solar resources instead of coal.

"We are actually in favor of nonpolluting or less polluting energy sources," said Lin Alder of Citizens for Dixie's Future, a Utah environmental group.

Several Utah groups have spoken against the plant and plan to protest tonight because they say pollution will blow into their state.

"We believe the natural gas plant (that was) permitted is a much better option, one which would produce more power for Nevada and send fewer people to the hospital in Utah," Alder said.

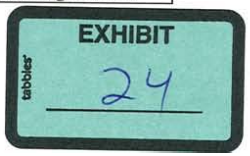
Power plant developers, including Johns and Maisano, have been critical of the claim that the three coal-fired plants proposed in Nevada, two of them in White Pine County, will pollute Utah air. That state gets about 85 percent of its power from coal.

Discussion: *1 comment so far...*

By GOD
2/7/08 at 9:07 a.m.
Suggest removal
OK hypocrites... last time I checked, nuclear is a pretty clean alternative for power used in countless asian and european countries and even here in the U.S.

Major Multi-State Power Lines Proposals in the 11 Western United States

Name (Abbreviation)	Starting Point (Load Center)	End Point (Generation Source)	Miles & States In Between	Voltage Class	Expected Rating	Generation Sources/ Additional Comments
TransWest Express (TWE)	AZ (PHX)	WY (Central)	1,000 miles; CO, UT, NV	500 kV AC/DC	3,000 MW	Coal focus (see Gateway South for common corr.) www.oatioasis.com/AZPS/AZPSdocs/ 4182006Frontier_Summit_Presenation.pdf
Gateway South (represents former WY West)	Las Vegas (Crystal)	WY (Central)	625 miles, UT	500 kV AC	*3,000 MW	coal and wind: transwest.azpsoasis.com/docs/2007_ 11_TWE_GS_Regional_Stakeholder_Meeting.pdf
Gateway West	Melba, OR	Central WY (Dave J. Sbst.)	1175 miles ID	230 kV 500 kV	3,000 MW	www.oatioasis.com/IPCO/IPCOdocs/Gateway1_Stakeholder _Meeting_Gateway_West_Presentation_Sept_7_Final.pdf
Frontier	CA	WY	1,000 miles; UT, NV	500 kV	6,000 MW	coal/wind *four potential routes all in WY to Vegas or PHX, then to S. and N. CA www.ftloutreach.com/workinggroups/ transmissionanalysis.html
High Plains Express (HPX)	AZ load centers	WY	1,280 miles CO, NM	up to 2 double 500 kV	3,500 to 7,500 MW	Wind, solar and scenarios mixing in fossil fuels. *looking to connect with WY-CO intertie, EPTP, Sunzia, CO-NM interconnection www.rmao.com/wtpp/HPX/HPX_Stakeholder_111407.pdf
Wyoming-Colorado Intertie Project (WCI) (also known as TOT 3)	NE CO (Pawnee Sbst.)	Central WY (Dave Johnst. Subst.)	380 miles	230 kV and 345 kV	900 MW	Billed as wind only/first. Open season in 2008. Concern that line might later extend north into PRB and then more likely be targeted for coal.
Cheyenne-Miracle Mile/Ault	NE CO (Ault Sbst.;)	s. central WY (M. Mile Sbst)	180 miles	230 kV upgrade	478 MW	coal/wind: FEIS at: www.eh.doe/gov/NEPA/ea /ea1456/
Eastern Plains Transmission Project (EPTP)	CO front range	eastern CO/ western KS	1,000 miles	230, 345 500 kV	2,000 plus MW	originally three coal plants; now possibly gas/wind mixture (or still some coal)
Sunzia Southwest Transmission Project	Near Casa Grande, AZ	Near Las Cruces, NM	300 miles	1 or 2 500 kV	3,000 MW	Solar, wind, geothermal and Bowie power station (proposed IGCC coal plant at one point)
CO-NM Interconnection Project	Walensburg CO	Gladstone, NM	117 miles	230 kV	200 MW	Energized and operational in 2007
BC—Northern CA Transmission	CA (Tracy)	B.C. (Selkirk)	1000 miles WA, OR	500 kV	3,000 MW	Renewables and other www.pge.com/biz/transmission_services/canada/
Northern Lights Celilo Project	CA (San Fran. area)	Alberta, CA	1100 miles WA, OR	500 kV HVDC	3,000	gas/coal; www.transcanada.com/company/northernlights.html



Northern Lights Inland Express MT	Las Vegas then CA (LA area)	MT (PRB)	1,000 miles ID, NV	500 kV HVDC	3,000 MW	coal/wind *from Borah, ID to Las Vegas, follows SWIP line
Montana-Alberta Tie Line	Lethbridge (Alberta, CA)	Great Falls or Shelby, MT	215 miles	230 kV	300 MW	wind and other? (follow HWY 15 n. of Great Falls) www.matl.ca/
Northern Lights Inland Express WY	Las Vegas then AZ (PHX)	WY	1,000 miles ID, NV	500 kV HVDC	3,000 MW	coal/wind *from Borah, ID to Las Vegas, follows SWIP line
South-West Intertie Project (SWIP) *H.Allen—Thirtymile is now part of SWIP for White Pines .	NV Harry Allen Sbst. NE of Las Vegas	Twin Falls, ID (Midpoint Sbst.)	500 miles	500 kV	1,800 MW	White Pine coal plant (1,590 MW) plus a wind project, will connect Idaho Power with Nevada Power Sierra Pacific Power Companies
Harry Allen-Robinson Summit (Ely Energy Center) *also called "ENTI or EN-ti and Nevada north-south	NV Harry Allen Sbst/ Substation	NV Robinson Summit Sbst. near	250 miles	500 kV	1,500 MW	Ely Energy Center first phases is 1,500 MW PV coal; 2nd phase is 1,000 MW IGCC coal; 200-300 MW of renewables capacity; would also connect IP with NP and SPPC
Mountains States Transmission Intertie (MSTI)	ID (Borah & Midpoint Sbsts.)	MT (Garrison & Townsend Sbsts.)	400 miles	500 kV	1,500 MW	fossil fuels and wind http://www.msti500kv.com/
PacifiCorp's Hemingway-Captain Jack	Southern OR	Central ID	375 miles	500 kV	1,500 MW	Renewables/other
Idaho – Northwest Project	SE washington	Central ID	300 miles OR		1000 MW	www.oatioasis.com/IPCO/IPCOdocs/Revised_Final_OASIS_Posting.pdf
Navajo Transmission Project (NTP)	Boulder City, NV	Farmington NM (Desert Rock)	470 miles AZ	500 kV	1,200 to 1,500 MW	Coal at proposed Desert Rock plant www.eere.energy.gov/tribalenergy/pdfs/37_dine_power_hoisington.pdf
Sunrise Powerlink	San Diego County CA	Imperial Valley CA	150 miles	230 to 500 kV	1,000 MW	geothermal, wind, possibly Mexico fossil sources *Anza-Borrego Desert St. Park lands/wildlife issues
Palo Verde – Devers II	N. Palm Springs, CA	AZ (Harquah. Sbst.)	230 miles	500 kV	900 MW	Natural gas power plant: www.cpuc.ca.gov/Environment/info/aspen/dpv2/map_1-1.pdf
Palo Verde – North Gila	Yuma, AZ	AZ (PV Hub)	115 miles	500 kV	1,500 MW	www.aps.com/files/siting/pvngpresentation_final.pdf

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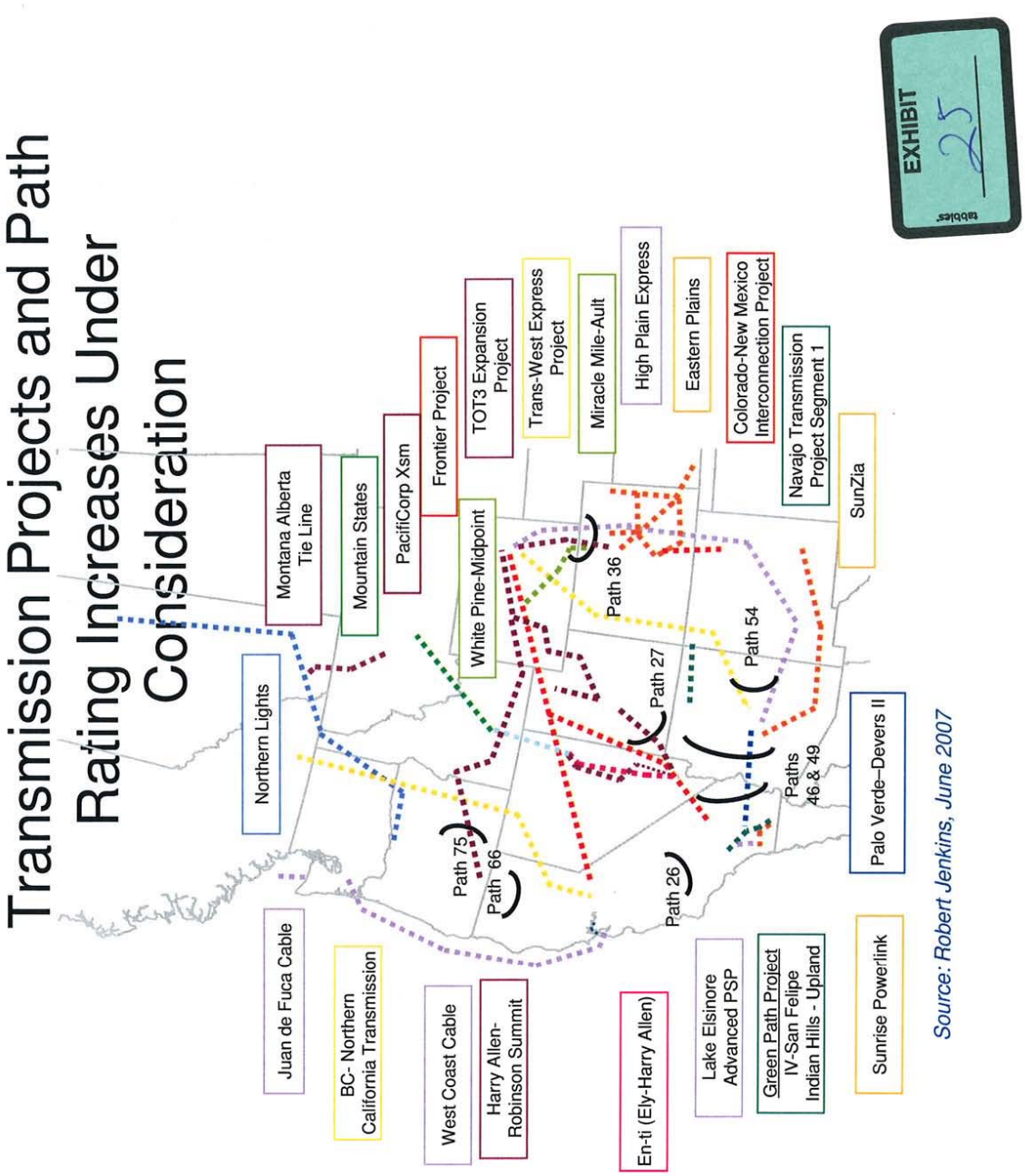
Transmission Projects and Path Rating Increases Under Consideration
Montana Alberta Tie Line
Mountain States
PacifiCorp Xsm
Frontier Project
TOT3 Expansion Project
Trans-West Express Project
Miracle Mile-Ault
High Plain Express
Eastern Plains
Colorado-New Mexico Interconnection Project
Navajo Transmission Project Segment 1
SunZia
Northern Lights
White Pine-Midpoint
Path 36
Path 27
Path 54
Path 75
Path 66
Path 26
Paths 46 & 49
Palo Verde–Devers II
Juan de Fuca Cable
BC- Northern California Transmission
West Coast Cable
Harry Allen-Robinson Summit
En-ti (Ely-Harry Allen)
Lake Elsinore Advanced PSP
Green Path Project IV-San Felipe Indian Hills - Upland
Sunrise Powerlink
Source: Robert Jenkins, June 2007

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Preserving America's Heritage

February 12, 2008

Mr. Michael D. Nedd
Director
Minerals, Realty and Resource Protection
Bureau of Land Management
1849 C Street NW, MS-204 LS
Washington, DC 20240

Ref: West-wide Energy Corridors Programmatic Environmental Impact Statement

Dear Mr. Nedd:

Thank you for the opportunity to comment on the West-wide Energy Corridors (WEC) Draft Programmatic Environmental Impact Statement (PEIS). The Advisory Council on Historic Preservation (ACHP) appreciates the challenges presented by a proposed project of this scale proceeding on the ambitious schedule established under the Energy Policy Act of 2005 (EPAct). Our comments below on the Draft PEIS are addressed to the Bureau of Land Management (BLM), which, with the Department of Energy (DOE), serves as co-lead for the purposes of review under the National Environmental Policy Act (NEPA).

Based on your letter dated July 20, 2007, to the ACHP, it is our understanding that the BLM has used the NEPA process to comply with Section 106, pursuant to 36 CFR § 800.8(c) of the regulations, "Protection of Historic Properties" (36 CFR Part 800), implementing Section 106 of the National Historic Preservation Act. In so doing, BLM is using the process and documentation for preparation of the Draft PEIS and other NEPA documents in lieu of the procedures set forth in 36 CFR §§ 800.3 through 800.6. We have reviewed the Draft PEIS and find that there are a number of issues that warrant additional clarification in order to ensure that the standards for developing NEPA environmental documents to comply with Section 106 established under 36 CFR § 800.8(c)(1) have been met.

First, the Draft PEIS is silent regarding the specific process used by BLM to comply with Section 106 and the ACHP's regulations. The Draft PEIS does not inform consulting parties and the public of the decision to substitute the NEPA process for Section 106 review per 36 CRF § 800.8(c). Accordingly, these parties presently have no clear way of knowing that the procedures used for the preparation and review of the Draft PEIS are also the vehicle for consulting about Section 106 concerns. We, therefore, recommend that BLM revise the Draft PEIS to include a clear explanation of the manner in which the NEPA process has been, and will continue to be, used to comply with Section 106 pursuant to 36 CFR § 800.8(c). Such an explanation would provide consulting parties and the public with critical information about the specific steps taken

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EXHIBIT
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by BLM to meet the requirements of Section 106, in much the same manner that compliance with the Endangered Species Act is explained at Section 1.5 of the Draft PEIS.

According to this draft, the PEIS has been developed in response to a land use planning action that is the first tier in a phased approach to Section 106 compliance. Although it appears not to be specifically articulated in the Draft PEIS, BLM's letter dated July 20, 2007 makes it clear that this phased approach is being employed pursuant to 36 CFR § 800.4(b)(2). The ACHP does not object to the phased approach adopted by the Draft PEIS or the use of a programmatic environmental document. Apparently, the subsequent phase of Section 106 compliance will be triggered by an application from industry to situate an energy project within the proposed WEC. When the respective lead and cooperating federal agencies reach this subsequent phase, it is important that the PEIS provide specific, adequate, and binding direction for taking into account all types of effects to historic properties, specifically indirect and cumulative, as well as direct effects. Accordingly, it is essential that the PEIS clearly explain for consulting parties and the public how Section 106 will be completed through the subsequent tier of the phased approach.

In this phased approach, the manner in which BLM and the other federal agencies will meet their Section 106 responsibilities for the subsequent phase of the decision-making process must be clearly stated and presented. In meeting this standard, we are particularly concerned that the Integrated Operating Procedures (IOP) do not provide the requisite clarity and specificity, and may not be sufficient for meeting statutory and regulatory requirements. For example, the IOPs need to be revised so that those procedures that address statutory or regulatory requirements, are written with language that is binding and enforceable to ensure that applicants and agencies fulfill their responsibilities. In addition, one IOP references compliance with Section 106 of NHPA while yet another cites the ACHP's regulations. This treatment does not make clear the relationship between legal requirements and the actions specified under the IOPs. This is especially problematic when an IOP attempts to restate a legal requirement without reference to it or selectively identifies such requirements.

Also, the timing of the actions called for under the IOPs is not clear and may be inconsistent with the ACHP's regulations. For example, one of the IOPs in the construction section seems to provide for the inclusion of identification procedures. Such an approach appears to suggest that project construction and Section 106 identification activities for the subsequent phase will be conducted simultaneously. How is this possible when in accordance with 36 CFR § 800.1(a), federal approval of an application for use of the WEC cannot be provided until Section 106 review has been concluded?

It also is not clear how the BLM plans to conclude Section 106 review. Under 36 CFR 800.8(c), when there is an adverse effect, BLM may conclude Section 106 through a commitment in the record of Decision (ROD) or through a Memorandum of Agreement (MOA). However, BLM has determined that the designation of corridors phase of land use planning decision-making will have no "direct effect." How then will BLM conclude Section 106 review for this phase in such a way to ensure that the IOPs which are developed will be implemented, and establish a binding approach agreeable to all the signatories for the subsequent phase of the referenced undertaking?

The ACHP does not object to the use of IOPs in what appears to be an effort to establish a standard approach to Section 106 regardless of the federal land manager, because such an approach has the potential to greatly streamline the application review process. However, further refinement of the IOPs is needed so that they do indeed benefit the review process when an application is filed for use of the proposed federal corridor by providing clear and enforceable procedures. Accordingly, we recommend that, prior to issuance of the Final PEIS, the BLM, the

DOE, and the cooperating agencies consult with the ACHP, the National Conference of State Historic Preservation Offices, the 11 State Historic Preservation Offices, the National Association of Tribal Historic Preservation Offices, the Tribal Historic Preservation Offices, Indian tribes, and other consulting parties to develop clearer and more enforceable IOPs.

Since BLM has begun the process of consultation with Indian tribes, we encourage you to ensure that tribal comments are taken into account in corridor planning, and to resolve tribal concerns expressed in the scoping and throughout the NEPA process. From the Tribal Consultation Contacts as of 12/3/2007, we note that twelve tribes are listed as having "*Action pending or documentation needed*," nineteen tribes are listed as requesting further consultation, and three tribes requested consultation at a "*higher decision-making level*." It is not clear how BLM has addressed these issues. Furthermore, our review of the specific tribal comments in the Draft PEIS, despite the extreme brevity of the entries, indicates the existence of significant levels of tribal concerns about the referenced undertaking. How has BLM considered and resolved these comments and concerns?

We look forward to continuing consultation on these matters with you. Should you have any questions, please contact Nancy J. Brown at 202-606-8582, or via e-mail at nbrown@achp.gov.

Sincerely,

[redacted]. Klima
[redacted]ector
Office of Federal Agency Program