U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Natural Gas Distribution Infrastructure Safety and Modernization Grant Program
Welch Gas Cooperative Association, West Virginia
Categorical Exclusion Documentation
NGDISM-FY23-CE-2024-09

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1. Overview

This document serves as the Pipeline and Hazardous Materials Safety Administration's (PHMSA) determination of applicability of Department of Energy's (DOE) B5.4 categorical exclusion (CE) for repair or replacement of pipelines for the project identified below. Effective July 3, 2024, PHMSA adopted DOE's CE in accordance with the Section 109 of the National Environmental Policy Act, enacted as part of the Fiscal Responsibility Act of 2023, which allows a federal agency to ''adopt'' another federal agency's CEs for proposed actions.

For projects that PHMSA determines that the DOE CE B5.4 is applicable, it must: (1) consider the presence of any integral elements at 10 CFR part 1021, subpart D, appendix B (1)-(5); and (2) evaluate the proposed action for extraordinary circumstances in which a normally excluded action may have a significant effect. If an extraordinary circumstance is present, the agency nevertheless may categorically exclude the proposed action if the agency determines that there are circumstances that lessen the impacts or other conditions sufficient to avoid significant effects.

The project identified below was provisionally awarded federal funding through PHMSA's Natural Gas Distribution Infrastructure Safety and Modernization (NGDISM) grant program. This document describes the proposed action, the anticipated impacts of that action, any circumstances or conditions that must be implemented to ensure significant effects are avoided, and documents the approval of the project as a categorical exclusion.

2. Project Description/Proposed Action

Project Title	Welch Natural Gas Pipeline Replacement
Project Location	Welch, WV (McDowell County)

Project Description/Proposed Action:

The Welch Gas Cooperative Association (WGC) proposes to replace and relocate 0.67 miles of existing 2-inch, and 4-inch steel pipeline situated within the banks of Browns Creek, which is susceptible to flash flooding (see Appendix A). The current steel pipe, which has been in place for 48 years, is exposed to natural forces that increase the risk of damage and methane leaks. The project will involve installing 0.79 miles of new 2-inch High-Density Polyethylene (HDPE) pipe in a trench within the West Virginia Department of Highways (WVDOH) right of way (ROW) along West Virginia Route 16. The depth of the new pipe installation will be consistently 4 feet below the surface. Horizontal drilling will be used in small areas under sidewalks. The existing steel pipe will be purged, capped and abandoned in place.

Question	Information
Describe the location and dimensions of all ground disturbing activities and provide a map depicting the location(s) where ground disturbance would occur. (e.g., width and depth of trenching or excavation for borings, location of regulator stations, etc.). Map(s)	The trenching and excavation for this project will cover a length of 0.79 miles (approximately 4,171 feet). The trench will be excavated to a depth of 4 feet and a width of 2 feet, ensuring sufficient space for

should accompany the project area description.	the safe installation of the HDPE pipe. The trenching will begin at Stewart Street (WV Route 16) and continue for 0.79 miles within the WVDOH right of way, where the pipeline will be laid in the newly excavated trench and then backfilled with suitable fill material to protect the pipe and ensure stability. The specific coordinates for the trenching start and end points are as follows: the start point is located at Latitude 37° 26' 24" N and Longitude 81° 35' 24" W, and the end point is at Latitude 37° 26' 24" N and Longitude 81° 34' 48" W. Stewart Street (WV Route 16) will be the primary route where the new pipeline will be installed within the WVDOH right of way.
If the exact location where new pipe would be installed or where other work would occur, provide the width of the ROW and/or the general area encompassing the footprint where all work would occur. Include the anticipated footprint and depth of new pipe installation.	The width of the ROW where the pipeline installation will occur is approximately 30 feet. This area will encompass the entire footprint where all work, including trenching, pipe installation, and backfilling, will take place. The anticipated footprint for the trenching required for the new pipe installation will be 2 feet in width and approximately 4 feet in depth to ensure adequate coverage and protection for the new HDPE pipeline. The trench will be dug to these dimensions along the 0.79-mile (approximately 4,171 feet) length of the pipeline route within the ROW. The depth of the new pipe installation will be consistently 4 feet below the surface, which is a standard depth to ensure the pipeline is well-protected from external factors such as weather and surface activities. This depth will also help mitigate potential risks from flooding and other natural forces that could impact the pipeline if it were installed at a shallower depth.
Will service lines be replaced? If so, include a map(s)	Yes.

depicting the location of service line replacements.	
Will meters or other equipment be replaced? If so, provide a description detailing what meter components, etc. will be replaced and indicate if this will require ground disturbance, if the equipment will be attached to existing structures, etc.	As part of the project, meters and other equipment associated with the pipeline will be evaluated and replaced if necessary. The specific components that may be replaced include gas meters, service regulators, and excess flow valves (EFVs). These replacements are critical to ensuring the safety, efficiency, and reliability of the natural gas distribution system.
What portions of the pipeline will be abandoned? What portions of the pipeline will be removed? A map should be included indicating where the existing line will be abandoned or removed.	All portions of the existing pipeline will be abandoned. The portions of the pipeline that will be abandoned include the 0.67 miles of existing 2-inch and 4-inch steel pipeline currently located within the banks of Browns Creek. This section of the pipeline will be purged, capped, and abandoned in place as part of the replacement and relocation process. The new HDPE pipeline will be installed within the WVDOH right of way along West Virginia Route 16.

Question	**Information**
What construction methods will be used? (Check all methods to be used)	Directional boring; Cut and cover (trenching)
Does the project require a new right-of-way not currently in the ownership of the utility? If new ROW will occur, please provide a description of the property to be acquired (existing condition and land use) and a map depicting the property to be acquired.	Utility Easement; No new right-of-way or easement needed Any acquisition of new right of way or easement would adhere to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
How many linear feet of pipe will be replaced or repaired?	4,171.20 linear feet (lf)

2.1. Proposed Pipeline Replacement Details

Existing Pipeline Length in feet	Pipeline Diameter in inches	Pipeline Material (cast iron, bare steel, coated steel, PVC)	Operating Pressure (PSI)	Reduced Pressure if Possible (PSI)	Year installed if known.
3,168.00 feet	2.00	Bare steel	40.00	20.00	1976
369.60 feet	4.00	Bare steel	40.00	20.00	1976

3. Resource Review

The following information represents questions posed to the project proponent identified on the cover page of this document regarding the project that was provisionally awarded grant funds under PHMSA's NGDISM program. The information and justification section includes the applicant's response. PHMSA's conclusions are based on applicant provided information, independently reviewed by PHMSA. The mitigation measures were reviewed and confirmed by the project proponent.

Air Quality and Greenhouse Gases (GHG)	
Question	**Information and Justification**
Is the project located in an area designated by the EPA as nonattainment or maintenance status for one or more of the NAAQS[1]? Attainment status can be found in 40 CFR Part 81, or in EPA's Green Book: https://www.epa.gov/green-book. See Appendix 4 for the steps required to identify that status of the project area.	No, the project area is located in McDowell County, West Virginia which is designated by the EPA as in attainment for all National Ambient Air Quality Standards (NAAQS) based on EPA's Greenbook.
Will the construction activities produce emissions that exceed de minimis thresholds (tons per year) described in the initial Tier 2 EA worksheet?	No.
Will mitigation measures be used to capture blowdown[2]? If yes, please describe how blowdown will be captured.	No.
Will you commit to reducing pressure prior to venting if the system has the capability?	Yes, the operating system pressure will be reduced from 40 pounds per square inch (PSI) to 20 PSI, prior to venting. Based on the size of the existing pipes identified in Section 2.1, 0.00005 thousand cubic ft (MCF) or 0.00139 kg of methane would be vented during construction.
Estimate the current leak rate per mile based on the type of pipeline material. Based on mileage of replacement and new pipeline material, estimate the total reduction of methane.	The existing leak rate is estimated to be 1,422 kilograms (kg)/year (yr). Replacement of pipelines would result in a leak rate of approximately 23 kg/yr. This would result in an estimated reduction of 1,399 kg/year in the first year (factoring in venting emissions) and 1,399 kg/year, each year after. This would result in a reduction of approximately 27,984 kg/year over a 20-year timeframe.

[1] Criteria Air Pollutants | US EPA

[2] Blowdown refers to the venting of natural gas in current facilities, in order to begin rehabilitation, repair, or replacement activities.

Is there any other information relevant to the project area or the proposed work as it pertains to Air Quality and Greenhouse Gas.	No.

Conclusion:
The project area is located in McDowell County, West Virginia which is designated by the EPA as in attainment for all National Ambient Air Quality Standards (NAAQS).

The proposed project would result in minor air quality impacts associated with construction activities, including the intentional venting of methane contained in the existing pipelines prior to replacement. Pipeline blowdowns are typically necessary to ensure that construction and maintenance work can be conducted safely on depressurized natural gas facilities and pipelines. Venting methane is required when service is switched from the existing line to the newly constructed line, but the volume of vented gas can depend on the ability to reduce pressure on the pipe segment or other mitigation actions. WGC is committed to reducing pressure from the normal operating pressure of 40 PSI to 20 PSI, prior to venting to reduce the amount of methane that will be released when gas services are transferred. During project construction, there would be some increase in ambient dust particulate from machinery and soil disturbances. These would be only temporary in nature and all efforts would be made through proper construction methods to ensure dust control and properly functioning equipment. Replacing leak prone pipe with newer, more durable materials will reduce leaks and overall methane emissions. Therefore, it is PHMSA's assessment that the proposed project would provide a net benefit to air quality from the overall reduction of greenhouse gas emissions and that no adverse indirect or cumulative impacts would result from the Proposed Action.

Mitigation Measures:

- Use on-road and non-road vehicles efficiently by minimizing speeds and the number of vehicles;
- Minimize excavation to the greatest extent practical;
- Use cleaner, newer, non-road equipment as much as practicable;
- Minimize all vehicle idling and at minimum, conforming with local idling regulations;
- Ensure that all vehicles and equipment are in proper operating condition;
- On-road and non-road engines must meet EPA exhaust emission standards (40 CFR Parts 85, 86, and 89);
- Cover open-bodied trucks while transporting materials;
- Use water or other approved dust suppressants at construction sites and on unpaved roadways, as necessary;
- Minimize the area of soil disturbance to that necessary for construction;
- Minimize construction site traffic by using offsite parking and shuttle buses, as necessary;
- Minimize the idling of equipment;
- Reduce pressure from 40 PSI to 20 PSI, prior to venting.

Water Resources	
Question	**Information and Justification**

Are there water resources within the project area, such as wetlands, streams, rivers, or floodplains? If so, would the project temporarily or permanently impact wetlands or waterways? If water resources are present but will not be impacted, please describe how these impacts will be avoided (e.g. directional boring under the resource, etc.) If possible, please provide supporting maps identifying water resources within the project area.	According to United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI), riverine wetlands are indicated within and directly adjacent to Browns Creek. Federal Emergency Management Agency (FEMA) maps show that there are special flood hazard areas within the project area. While NWI classifies Browns Creek as R3RBH, all construction and trenching activities of the project would occur north of Browns Creek, and existing steel pipeline within the banks of Browns Creek will be abandoned in place. Therefore, there will be no impacts to wetlands or open water resources.
Under the Clean Water Act, is a Section 401 State certification potentially required? If yes, describe anticipated permit and how project proponent will ensure permit compliance.	No.
Under the Clean Water Act, is a USACE Section 404 Permit required for the discharge of dredge and fill material? If yes, describe anticipated permit and how project proponent will ensure permit compliance.	No. No dredge or fill material would be discharged into a waterway. All work would occur within previously roadway ROW north of Browns Creek.
Under the Clean Water Act, is an EPA or State Section 402 permit required for the discharge of pollutants into the waters of the United States? Is a Stormwater Pollution Prevention Plan (SWPPP) required? If yes, describe how project proponent will ensure permit compliance.	Yes. Construction activities may exceed soil disturbance thresholds, and a 402 permit may be required prior to construction. Yes. WGC will develop a stormwater pollution prevention plan, prior to the commencement of work, if necessary.

Will work activities take place within a FEMA designated floodplain? If so, describe any permanent or temporary impacts, the state or local governing regulations, and the required coordination efforts with state or local floodplain regulatory agencies.	FEMA's flood maps indicate the project area is located in FEMA Flood Zones A and AE. Areas designated as Zones A and AE are considered Special Flood Hazard Areas and correspond to the one percent annual chance of flooding (100-year floodplain). The local floodplain coordinator will be contacted prior to work starting.
Is the project located in a Coastal Zone? Will the proposed project activities affect any coastal use or natural resource of the coastal zone, requiring a Consistency Determination and Certification? Please provide any relevant information regarding how the project proponent normally coordinates with the applicable state's coastal zone management agency.	No, the project is not located within a designated coastal zone.
Is there any other information relevant to the project area or the proposed work as it pertains to Water Resources.	No

Conclusion:

PHMSA reviewed NWI maps, as well as the FEMA national flood hazard maps. Areas within Browns Creek are classified by the NWI as Riverine (R3RBH). Portions of the project area along West Virgina State Highway 16 occur in FEMA Flood Zones A and AE. Project activities would not affect the flood-holding capacity of the 100-year floodplain or cause any adverse impacts to the Special Flood Hazard Area. All project activities will occur north of the Browns Creek bank, and the existing steel pipeline within the banks of Browns Creek would be abandoned in place. There would be temporary impacts from project activities; however, all areas would be restored to pre-construction contours and conditions and there would be no permanent impacts. By avoiding direct impacts to aquatic resources and implementing best management practices during construction, PHMSA does not anticipate any adverse impacts to water resources.

Mitigation Measures:

- Avoid staging and laydown areas in wetlands or floodplains;
- Reseed disturbed areas with native plant species;
- Restore disturbed areas to pre-construction contours;
- Adhere to additional mitigation measures in accordance with applicable permits;
- Use Best Management Practices during construction to control sediment and erosion and prevent pollutants from entering adjacent waterways;
- Coordinate with the appropriate FEMA representative or local floodplain coordinator when work will occur in FEMA designated special flood hazard areas, as needed.

Groundwater and Hazardous Materials/Waste	
Question	**Information and Justification**
Does the project have potential to encounter and impact groundwater? If yes, describe potential impacts from construction activities.	No.
Will the project require boring or directional drilling that may require pits containing mud and inadvertent return fluids? If yes, describe measures that will be taken during construction activities to prevent impacts to groundwater resources. If boring or directional drilling will not require pits, please describe why these will not be required and how fluids will be contained.	No. The areas that will be required to be drilled are small areas under sidewalks which will need a pump truck on site to contain the liquids required for the drilling.
Will the project potentially involve a site(s) contaminated by hazardous waste? Sites identified as containing hazardous waste/materials can be identified through EPA's NEPAssist tool https://nepassisttool.epa.gov/nepassist/nepamap.aspx or local databases identifying Superfund, Brownfields, etc. If hazmat sites are identified in or near areas where work will occur, describe how the proposed work poses no risk and/or what mitigative measures will be used to avoid identified sites.	No. Based on review of reviewed EPA's NEPAssist tool, numerous hazardous waste sites were identified near the project area, but no brownfield or superfund sites were identified within the project area.
Is there any indication that the pipeline was ever used to convey coal gas? If yes, PHMSA will work with the project proponent for required studies.	No.
Does the project have the potential to encounter or disturb lead pipes or asbestos? If yes, describe how project proponent will ensure no risk will result.	No. Given the shallow depth of placement for gas main pipes compared to that of other utilities it is not likely that asbestos or lead pipes will be encountered during construction.
Is there any other information relevant to the project area or the proposed work as it pertains to Groundwater and hazardous materials/waste.	No.
Conclusion: PHMSA reviewed EPA's NEPAssist to identify any brownfield properties, hazardous waste sites, and/or superfund sites. There were numerous hazardous waste sites identified near the project area; however, there were no brownfields sites or superfund sites identified in the project area. Hazardous waste information is identified in the Resource Conservation and Recovery Act Information (RCRAInfo), which is a national program that includes an inventory of all generators, transporters, treaters, storers, and disposers of hazardous waste that are required to provide information about their activities to state environmental agencies.	

Mitigation Measures:

- Develop and adhere to a Stormwater Pollution Prevention Plan;
- Avoid boring/drilling, staging and laydown areas within EPA superfund sites or areas containing known waste;
- Adhere to applicable groundwater and/or soil management plans;
- Develop and implement an HDD Inadvertent Return and Contingency Plan to establish operational procedures and responsibilities for the prevention, containment, and clean-up of inadvertent returns associated with the directional drilling on the Project.

Biological Resources	
Question	**Information and Justification**
Based on review of IPaC and NOAA Fisheries database, are there any federally threatened or endangered species and/or critical habitat potentially occurring within the geographic range of the project area? Are there any state listed species within the geographical range of the project area? If no, no further analysis is required. Please provide a copy of IPaC species list and relevant state protected species list.	Yes, based on review of the USFWS's Information for Planning and Consultation (IPaC). Additionally, West Virginia Department of Natural Resources were inventoried to identify state listed species.
Are there any known State or Federally, listed threatened or endangered species or habitat areas for State or Federally listed species present in or immediately adjacent to areas where work will occur? If yes, describe how project proponent will avoid impacts to listed species or habitat. If there are potential impacts to federally listed species or critical habitat, PHMSA will work with the project proponent to conduct necessary consultation with resource agencies.	No. Due to the nature of construction no impacts are expected. Shallow excavation will be conducted in previously disturbed and developed areas. No tree clearing is foreseen as part of this project. No endangered or threatened species will be impacted.
Will there be any tree clearing or removal of woody vegetation involved with the proposed work?	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Biological Resources?	No.

Conclusion:

The project area is built out and is comprised of previously disturbed developed and residential areas. PHMSA requested an official species list through the USFWS's IPaC website. The following species were identified as potentially occurring in the project area:

- Gray bat (*Myotis grisescens*) endangered
- Indiana bat *(Myotis sodalist)* endandered
- Northern long-eared bat (*Myotis septentrionalis*) endangered
- Big Sandy crayfish (*Cambarus callainus*) threatened
- Monarch butterfly (*Danaus plexippus*) candidate

There was no critical habitat identified within the project area, and no state-listed species were identified.

The work would occur within existing ROW where the footprint of the proposed work has already been disturbed and is maintained. Because these areas are within ROW that has been previously impacted (pipelines and utilities laid in the ground in close proximity to the location where new pipes would be laid and subsequently paved), the immediate project area has very limited biological resources present. There would be no work occurring within water resources. Therefore, in accordance with Section 7 of the Endangered Species Act (ESA) PHMSA's assessment is that the project would have no effect to gray bat, Indiana bat, Northern long-eared bat, or Big Sandy crayfish. As a candidate species, the monarch butterfly receives no statutory protection under the ESA. PHMSA's assessment is that the project would have no adverse impacts to any listed species and would not cause more than negligible adverse impacts to other biological resources in the project area.

Mitigation Measures:

- No mitigation measures needed.

Cultural Resources	
Question	**Information and Justification**

Please describe all ground disturbing activities associated with the project (including pipeline installation, service line installation, gas meter replacements, metering station construction or demolition, etc.). What is the maximum depth, width and length of excavations for each activity involving ground disturbance?	The project will involve several ground disturbing activities, including pipeline installation, service line installation and gas meter replacements. The installation of 0.79 miles of new pipeline will involve excavations with a maximum depth of 6 feet, a width of 3 feet, and a length of up to 4,171.2 feet. Service line installations will require smaller trenches with a maximum depth of 4 feet, a width of 2 feet, and varying lengths depending on the specific service connections. Gas meter replacements will generally involve minimal ground disturbance, as they will be attached to existing structures; however, some minor excavation may be required to connect to the existing service lines, with a typical depth of 2 feet and a width of 1 foot. Gas meter replacements will be completed where it is not feasible to connect the existing meter to the new service line. In certain situations, it may be required to install a new meter in a more accessible location due to the placement of the new service line.
Will ground disturbance take place entirely in existing ROW or utility easements? Will it be restricted entirely to paved areas or will some disturbance take place in grassy, undisturbed, or natural areas?	Yes Yes, all ground disturbance activities associated with the project, including trenching for pipeline installation, service line connections, and potential gas meter replacements, will occur within the existing right-of-way (ROW) of the West Virginia Department of Highways (WVDOH) along WV Route 16. New utility easements will be required to connect the existing meter to the new service line. No The ground disturbance will not be restricted entirely to paved areas. While a significant portion of the work will occur within existing rights-of-way (ROW) and utility easements, some disturbance will also take place in grassy, undisturbed, or natural areas. These areas include grassy sections adjacent to roadways and houses.

Has the entire project area (width, length and depth) been previously disturbed by the original installation or other activities? If so, provide documentation or a description of prior ground disturbances, such as road or utility cross sections, plans or as-builts. If documentation is not available provide justification for how the ground was previously disturbed.	No.
Does the project involve any physical impacts to buildings or structures? Please provide a description of the work that may affect buildings or structures and provide addresses and/or a map showing the locations.	No, physical impacts to buildings or structures shall take place. All efforts will be made to keep the existing meter in place, but in certain situations it may require the meter to be moved. This would possible mean moving the meter from one side of the building to another side.
Please describe the project area and provide several photographs to show the character of the project area and surrounding properties. Is it a residential or commercial area? Are the nearby properties old or modern? Streetscapes and views looking down the ROW to show flanking properties are preferred. Please provide a photo key and/or captions to identify where the photos were taken and what they are showing.	The project area is primarily residential with older properties/ houses 45+ years old.
Does the project involve construction or installation of any new aboveground components? If so, describe the components, identify their location and provide representative images of the components.	Yes, the project could require that existing meters be relocated to a different location in order for it to be connected to the new service line.

Are there any nearby properties or resources that either appear to be or are documented to have been constructed more than 45 years ago?[3] Does there appear to be a group of properties of similar age, design, or method of construction? Or are there any designed landscapes such as a park or cemetery? Please provide photographs of any properties that may be more than 45 years in age and would have the potential to be affected by the project (such as properties that include meter replacements, service line replacements or buildings within 10 feet of the areas proposed for pipeline main replacement under pavement). Multiple properties may be photographed together in a streetscape view and if there are many properties over 45 years in age, representative photos may be provided of a neighborhood rather than individual photos of each property.	Yes, there are houses and buildings that appear to have been constructed more than 45 years ago. Yes, the houses in the area seem to have similar age, design and construction.
Will project implementation require removal or disturbance of any stone or brick sidewalk, roadway, or landscape materials or other potentially old or unique features? Please provide a handful of representative photos of the project area to show the character of the roadway and sidewalk materials in the project and staging areas. Include a photo key and/or captions of what the photos are showing and where they were taken.	The project will primarily affect driveways and sidewalks rather than stone or brick features.
Is there any other information relevant to the project area or the proposed work as it pertains to Cultural Resources?	No.
Conclusion:	

[3] Local tax and property records or historic maps may indicate dates of construction.

Mitigation Measures:

PHMSA identified properties based on available information on previously identified historic properties in the APE, including the National Register of Historic Places (NRHP) database and data received from the West Virginia Department of Arts, Culture and History. PHMSA also conducted research to determine if there are any previously unidentified properties within the APE that are 45 years of age or older and may be eligible for the NRHP. This research revealed no NRHP listed or eligible properties within the APE or within a half-mile.

A letter was sent on October 24, 2024, to the West Virginia State Historic Preservation Officer (SHPO) and all consulting parties outlining the Section 106 process, including a description of the undertaking, delineation and justification of the APE, identification of historic properties and an evaluation and proposed finding of effects. Based on this consultation, PHMSA proposed a finding that the Proposed Action would not adversely affect historic properties. PHMSA has requested comments on the Section 106 process, identification of historic properties, and proposed finding within 30 days of receipt of the letter.

PHMSA also invited the following federally recognized tribes to participate in consultation by separate letter on October 24, 2024:

• Cherokee Nation
•Eastern Band of Cherokee Indians

Mitigation Measures:

- If, during project implementation, a previously undiscovered archaeological or cultural resource that is or could reasonably be a historic property is encountered or a previously known historic property will be affected in an unanticipated manner, all project activities in the vicinity of the discovery will cease and the Welch Gas Cooperative Association will immediately notify PHMSA. This may include discovery of cultural features (e.g., foundations, water wells, trash pits, etc.) and/or artifacts (e.g., pottery, stone tools and flakes, animal bones, etc.) or damage to a historic property that was not anticipated. PHMSA will notify the State Historic Preservation Office and participating federally recognized tribes and conduct consultation as appropriate in accordance with 36 CFR § 800.13. Construction in the area of the discovery must not resume until PHMSA provides further direction. The Village will strictly adhere to PHMSA's *Unanticipated Discoveries Protocols*.

- In the event that unmarked human remains are encountered during permitted activities, all work shall halt and the Welch Gas Cooperative Association shall immediately contact PHMSA as well as the proper authorities in accordance with applicable state statutes to determine if the discovery is subject to a criminal investigation, of Native American origin, or associated with a potential archaeological resource. At all times human remains must be treated with the utmost dignity and respect. Human remains and associated artifacts will be left in place and not disturbed. No skeletal remains or materials associated with the remains will be photographed, collected, or removed until PHMSA has conducted the appropriate consultation and developed a plan of action. Project activities shall not resume until PHMSA provides further direction.

- All work, material, equipment, and staging to remain within the road's existing right-of-way or

utility easement or other staging areas as identified in the environmental documentation. If the scope of work changes in any way that may alter the effects to historic properties as described herein, the grant recipient must notify PHMSA, and consultation may be reopened under Section 106.

Section 4(f)	
Question	**Information and Justification**
Are there Section 4(f) properties within or immediately adjacent to the project area? 4(f) properties include publicly owned parks, recreational areas, wildlife or waterfowl refuges, and historic sites. If yes, provide a list of properties and/or a map of 4(f) properties as an attachment.	Yes. A community park located at the intersection of Central Avenue and Stewart Street (West Virginia Route 16) was identified within the project area.
Will any construction activities temporarily impact use of the park including but not limited to access to any portion of the park, parking lots, trails, recreational fields, etc.?	No, project activities would be limited to West Virginia Department of Highways right of way. Use and access to the community park would not be impacted.
Will any construction activities occur within the property boundaries of a Section 4(f) property? If so, please detail these activities and indicate if these are temporary or permanent uses of the Section 4(f) property. Further coordination with PHMSA is required for all projects that might impact a Section 4(f) property.	No, project activities would be limited to West Virginia Department of Highways right of way.
Is there any other information relevant to the project area or the proposed work as it pertains to Section 4(f)?	No.

Conclusion:
Section 4(f) of the US Department of Transportation (USDOT) Act of 1966 as amended (Section 4(f)) (49 U.S.C. § 303(c)); is a federal law that applies to transportation projects that require funding or other approvals by the USDOT. Section 4(f) prohibits the Secretary of Transportation from approving any program or project which requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or any land from an historic site of national, state, or local significance unless:

- There is no feasible and prudent alternative to the use of the land;
- The program or project includes all possible planning to minimize harm to such park, recreational area; wildlife and waterfowl refuge, or historic site, resulting from such use.

PHMSA conducted a review of the project area and confirmed that there are no publicly owned public parks, recreation areas, national, state, or local significant wildlife and waterfowl refuges, or any historic sites of national, state, or local significance affected by the project. Therefore, there would be no use of Section 4(f) resources.

Mitigation Measures:

- WGC shall ensure that full public access to, and use of the community park is maintained during construction.
- Ensure construction activities do not interfere with public access to and/or use of public recreational facilities during construction.

Land Use and Transportation	
Question	**Information and Justification**
Will the full extent of the project boundaries remain within the existing right-of-way or easements? If no, please describe any right-of-way acquisitions or additional easements needed and provide a map of these areas as an attachment.	Yes, the project will remain in the existing West Virginia Department of Highways right of way. Utility easements will be required to connect the existing meter to the new service line.
Will the project result in detours, transportation restrictions, or other impacts to normal traffic flow or to existing transportation facilities during construction? How long are construction activities estimated to last?	Yes, minor traffic interruptions are anticipated. No permanent changes to transportation facilities would occur. Construction activities are anticipated to last 1 year.
Will there be any permanent change to existing transportation facilities? If so, what are the changes, and how would changes affect the public?	No, the project would not result in any permanent changes to transportation facilities.

Will the project interrupt or impede emergency response services from fire, police, ambulance or any other emergency or safety response providers? If so, describe any coordination that will occur with emergency response providers? How long will service interruptions last, if applicable.	No, the project would not interrupt or impede emergency response services.
Is there any other information relevant to the project area or the proposed work as it pertains to Land Use and Transportation?	No.

Conclusion:
There will be no permanent changes to land use. The project is replacing/upgrading the existing pipe and would not include new pipeline to serve any additional areas. During construction, there may be short-term impacts to adjacent residences, businesses and normal traffic patterns. Potential impacts include an increase in noise, dust, and transportation accessibility, as a result of construction and construction staging.

Local and state regulations guide the transport of machinery, equipment, and automobiles around the construction areas. Temporary traffic impacts may occur on the local road network and adjacent pedestrian routes.

Mitigation Measures:

- Restore all Impacted areas to pre-construction conditions;
- Maintain traffic flows to the extent possible;
- Use traffic control measures to assist traffic negotiating through construction areas, as needed;
- Coordinate with state and local agencies regarding detours and/or routing adjustments during construction;
- Notify potentially impacted residents and/or business owners (access, parking, etc.);
- Have a traffic control plan in place, prior to construction, and coordinate with the appropriate agency well in advance of any impacted emergency services or essential agency functions.

Noise and Vibration	
Question	**Information and Justification**
Will the project construction occur for longer than a month at a single project location?	No.
Will the project location be in proximity (less than 50-ft.) to noise sensitive receivers (residences, schools, houses of worship, etc.)? If so, what measures will be taken to reduce noise and vibration impacts to sensitive receptors?	Yes, the project will occur within 50 feet of noise sensitive receivers, construction activities would be limited to normal weekday business hours and all equipment mufflers would have proper maintenance.
Will the project require high-noise and vibration inducing construction methods? If so, please specify.	No.

Will the project comply with state and local ordinances? If so, identify applicable ordinances and limitations on noise/vibration times or sound levels.	There are no local applicable noise ordinances for the City of Welch or McDowell County.
Will construction activities require large bulldozers, hoe ram, or other vibratory equipment within 20 feet of a structure?	Yes, vibratory equipment and hoe rams may be needed for construction.
Is there any other information relevant to the project area or the proposed work as it pertains to Noise and Vibration?	No.

Conclusion:

The project is located in the City of Welch, West Virginia. The ambient noise consists of a combination of environmental noise from road traffic, construction, industry, population density and other sources. The pipeline replacement project would result in temporary construction noise impacts; however, no vibration impact should occur. Excavators, dump trucks, skid steers, rollers, pavers, and other similar construction equipment would be used to excavate a trench, lay pipe, compact soils and re-pave the affected areas. The use of construction equipment would result in temporary noise impacts. Construction for the project is anticipated to last 12 months. There are numerous sensitive noise receptors (residences, houses of worship, etc.) located adjacent to the streets where work would occur. Noise impacts experienced by these receptors would be minor and temporary, and no adverse vibration impacts would result from the proposed work. Construction would be required to abide by local, city and/or state noise regulations. Noise control measures would be chosen by the contractor and could include the following, as necessary:

- Use low-noise emitting equipment;
- Implement noise-deadening measures for truck loading and operations;
- Conduct monitoring and maintenance of equipment to meet noise limits;
- Use acoustic enclosures, shields, or shrouds for equipment;
- Minimize the use of generators or use quiet generators to power equipment.

Mitigation Measures:

- Adhere to all local, city and/or state noise regulations.

Environmental Justice	
Question	**Information and Justification**

Using the EPA EJScreen or census data[4], is the project located in an area of minority and/or low-income individuals as defined by USDOT Order 5610.2(c)?	Based on review of socioeconomic data using the EPAs EJScreen, the population residing within the general project area contains 49 percent low income and 33 percent minority populations. The percentage of these populations is below the McDowell County average of 61 percent for low income and above the McDowell County average 11 percent for minority populations.
Will the project displace existing residents or workers from their homes and communities? If so, what is the expected duration?	No.
Will the project require service disruptions to homes and communities? If so, what is the expected communication and outreach plan to the residents and the duration of the outages?	Yes, outages are only expected on the day a natural gas service is tied over to a new natural gas main. Each effected resident would be notified 1 week prior to any service disruptions.
Are there populations with Limited English Proficiency located in the project area? If so, what measures will be taken to provide communications in other languages?	No.
Is there any other information relevant to the project area or the proposed work as it pertains to Environmental Justice?	No.

Conclusion:
Executive Order (E.O.) 14096—"Revitalizing Our Nation's Commitment to Environmental Justice for All" was enacted on April 21, 2023. E.O. 14096 on environmental justice does not rescind E.O. 12898 – "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," which has been in effect since February 11, 1994 and is currently implemented through DOT Order 5610.2C. This implementation will continue until further guidance is provided regarding the implementation of the new E.O. 14096 on environmental justice.

The proposed project would result in an overall reduction in GHG emissions. Construction activities would result in minor temporary air quality impacts, including the intentional venting of existing distribution lines prior to replacement. Noise impacts associated with construction are anticipated to be minor. The removal of leak prone pipe would reduce leaks and the potential for incidents, will result in an increase in pipeline safety across the system while also improving operation and reliability. Therefore, consistent with Executive Order 12898 and DOT Order 5610.2(c), PHMSA's assessment is that the project would not result in disproportionately high and adverse effects on minority or low-income populations, or other underserved and disadvantaged communities.

[4] https://www.census.gov/quickfacts/fact/table/US/PST045222

Mitigation Measures:

- Provide advanced notification of service disruptions and construction schedule to all affected parties including residents and businesses adjacent to the project area.
- Coordinate service disruptions and construction schedule with local community leaders and groups, as applicable.
- Maintain service at temporary facilities, if appropriate.
- Promote public engagement to reduce project delivery delays and public controversy.
- Develop outreach plans to involve and engage all populations.

Safety	
Question	**Information and Justification**
Has a risk profile been developed to describe the condition of the current infrastructure and potential safety concerns?	Yes, as described in the Distribution Integrity Management Program (DIMP). Leaks and hazardous conditions have been identified within the existing system.
Has a public awareness program been developed and implemented that follows the guidance provided by the American Petroleum Institute (API) Recommended Practice (RP) 1162?	Yes, a public awareness program would be implemented according to the API recommended practice 1162.
Does the project area include pipes prone to leakage?	Yes, the pipes schedules for replacement under this project are aging leak prone pipes installed in the 1976.
Will construction safety methods and procedures to protect human health and prevent/minimize hazardous materials releases during construction, including personal protection, workplace monitoring and site-specific health and safety plans, be utilized? If yes, document measures and reference appropriate safety plans.	Yes, construction safety methods and procedures are covered in the Operating and Maintenance (O&M) Plan.
Has an assessment of the project been performed to analyze the risk and benefits of implementation?	Yes, an assessment of the project has determined that it would have a large benefit to the community given the current risk caused by the existing leak prone pipe.
Is there any other information relevant to the project area or the proposed work as it pertains to Safety?	No.

Conclusion:
The project would reduce the risk profile of existing pipeline systems prone to methane leakage and would also benefit disadvantaged rural and urban communities with the safe provision of natural gas. The project responds to the need to address the potentially unsafe condition of the natural gas distribution system of pipelines. The repair, rehabilitation, or replacement of pipelines would be constructed in accordance with industry best practices and would comply with all local, state, and federal regulations, including those for safety.

The abandonment of the existing pipeline would be conducted in accordance with PHMSA requirements found in 49 CRF 192.727 and 195.402(c)(10). These requirements include disconnecting pipelines from all sources and supplies of gas, purging all combustibles and sealing the facilities left in place. These requirements for purging and sealing abandoned pipelines would ensure that the abandoned pipelines are properly purged and cleaned and pose no risk to safety in their abandoned state. Therefore, PHMSA's assessment is that this replacement project would improve the overall safety of the existing pipeline infrastructure.

Mitigation Measures:

- Incorporate public awareness programs, as necessary;
- Use standard construction safety methods and procedures;
- Ensure DIMP procedures are updated as necessary;
- Ensure work is constructed in accordance with industry best practices;
- Comply with all local, state, and federal regulations.

4. Categorical Exclusion Determination

Categorical Exclusions to be Applied:

As the proposed action is repair, replacement, upgrading, rebuilding, or minor relocation of pipelines within existing rights-of-way to an existing natural gas pipeline, the following Categorical Exclusion, as listed in the DOE NEPA implementing procedures, 10 CFR 1021, adopted by PHMSA effective July 3, 2023[5] applies:

> B5.4 Repair or Replacement of Pipelines
>
> Repair, replacement, upgrading, rebuilding, or minor relocation of pipelines within existing rights-of-way, provided that the actions are in accordance with applicable requirements (such as Army Corps of Engineers permits under section 404 of the Clean Water Act). Pipelines may convey materials including, but not limited to, air, brine, carbon dioxide, geothermal system fluids, hydrogen gas, natural gas, nitrogen gas, oil, produced water, steam, and water.

Eligibility Criteria:

The proposed activity meets the eligibility criteria of 10 CFR 1021.41O(b) because the proposed action does not have any extraordinary circumstances that might affect the significance of the environmental effects, is not connected to other actions with potentially significant impacts [40 CFR 1508.25(a)(l)], is not related to other actions with individually insignificant but cumulatively significant impacts [40 CFR 1508.27(b)(7)], and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during environmental impact statement preparation.

The "Integral Elements" of 10 CFR 1021 are satisfied because the proposed action will not:

1. Threaten a violation of statutory, regulatory, or permit requirements for environment, safety, and health, including requirements of DOE and/or Executive Orders;
2. Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities;
3. Disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)-excluded petroleum and natural gas products that preexist in the environment such that would be uncontrolled or un-permitted releases;
4. Have the potential to cause significant impacts on environmentally sensitive resources, which includes (i) property (sites, buildings, structures, and objects) of historical, archeological, or architectural significance; (ii) federally-listed and state-listed threatened or endangered species or their habitat, federally-protected marine mammals and essential fish habitat and otherwise federally-protected species; (iii) floodplains and wetlands; (iv) federally and state designated areas (wilderness areas, national parks, national monuments, national natural landmarks, wild and scenic rivers, wildlife refuges, scenic areas, and marine sanctuaries); (v) prime or unique farmland; (vi) special sources of water (sole-source aquifers, wellhead protection areas, and other vital water resources); and (vii) tundra, coral reefs, or rain forests); or
5. Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species.

[5] Federal Register :: Adoption of Department of Energy Categorical Exclusion Under the National Environmental Policy Act

Compliance Action:

PHMSA is aware of the November 12, 2024 decision in Marin Audubon Society v. Federal Aviation Administration, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality (CEQ) regulations implementing NEPA are not judicially enforceable or binding on this agency action, PHMSA has nonetheless elected to follow those regulations at 40 C.F.R. Parts 1500–1508, in addition to the USDOT Procedures for Considering Environmental Impacts – DOT Order 5610.1C at https://www.transportation.gov/office-policy/transportation-policy/procedures-considering-environmental-impacts-dot-order-56101c, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

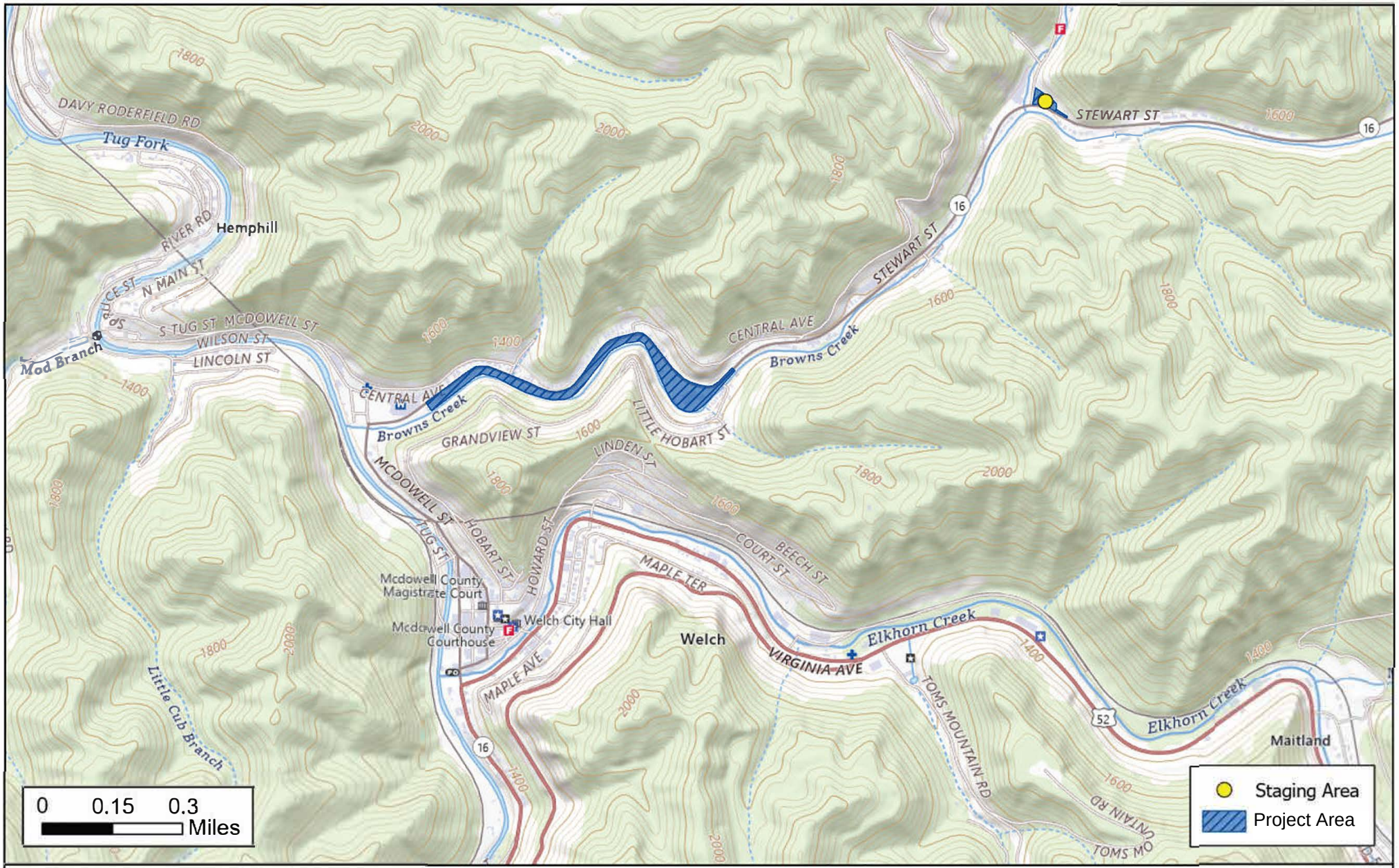
The proposed action satisfies the DOE NEPA eligibility criteria and integral elements, does not pose extraordinary circumstances, or includes conditions that must be implemented to ensure significant effects are avoided, and meets the requirements for the CE referenced above. Based on my review of the proposed action, I have determined that the proposed action fits within the specified categorical exclusion, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

PHMSA Approval:

SHELBY MATTHEW FULLER

Digitally signed by SHELBY MATTHEW FULLER
Date: 2024.12.20 10:47:28 -06'00'

Project Area Map



Name: Welch Gas Cooperative Association Pipeline Replacement
Scale: 18,000
Total Acreage: 12
Welch, West Virginia, McDowell County

N

Service Layer Credits: USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road data; Natural Earth Data; U.S. Department of State HIU; NOAA National Centers for Environmental Information