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

Natural Gas Distribution Infrastructure Safety and Modernization Grant Program
City of Kaw City, Oklahoma
Categorical Exclusion Documentation
NGDISM-FY23-CE-2024-11

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1. Overview

This document serves as the Pipeline and Hazardous Materials Safety Administration's (PHMSA) determination of applicability of the 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 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 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	Kaw City Natural Gas Pipeline Replacement Project
Project Location	Kaw City, Kay County, Oklahoma

Project Description/Proposed Action:

The Kaw City Municipal Gas Department operates a natural gas distribution system serving the City of Kaw City. A range of up to 246 services with an average length of 50-feet equaling a total of 12,300 feet or 2.33 miles containing isolated steel pipes or risers are proposed for replacement. The materials in the services are a mixture of unknown polyethylene and unprotected steel. The mixture is assumed to be 75 percent polyethylene (1.75 miles) and 25 percent unprotected steel (0.58 miles).

The entirety of the project will take place in the existing right-of-way (ROW) and utility easements, and the existing pipe would be abandoned in place (see Appendix A). The utilities all lay in the green area of the road right of way (approximately 12-15 feet). All pipes operate at a pressure of 60 pounds per square inch (PSI).

Construction methods would include cut and cover (trenching) and directional boring. Since structures exist on either side of the road, approximately half of the service lines will have to be bored under the road. During boring, the ground will only be disturbed where the existing

service line runs from the main to the above-ground meter. The bell hole for the tie-in will be 4 to 5 feet in diameter to allow a safe working room and minimize the chance of an unsafe atmosphere. The bell hole at the service riser end will be smaller, but it must have sufficient room to remove the old riser and to allow the new riser to be tied into the existing customer-owned service riser. This bell hole is anticipated to be 2 feet in diameter or less. When the service line is installed by direct bury, the ditch will be cut with either a backhoe or trencher. The trench from a bucket on a backhoe will be 12 to 14 inches, while the trencher width will be 6 inches.

Kaw City will install the new pipes adjacent to the existing pipes and abandon the existing pipes after utility services have been moved to the new pipeline. Abandonment of the existing pipeline (versus excavation and removal) would minimize ground disturbance and facilitate the replacement process in a more efficient manner. The existing main has approximately 36 inches of cover, and we will have to expose the main with a minimum of extra depth to allow a new tie-in to be made. The service line will transition from 36 inches of cover at the main to 12 to18 inches at the service riser. Construction is anticipated to last 3 months.

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) should accompany the project area description.	The pipelines are located in the City of Kaw's right of ways and beneath the roadway. During boring, the ground will only be disturbed where the existing service line runs from the main to the above-ground meter. The bell hole for the tie-in will be 4 to 5 feet in diameter. The bell hole at the service riser end will be smaller, but it must have sufficient room to remove the old riser and to allow the new riser to be tied into the existing customer-owned service riser. This bell hole is anticipated to be 2 feet in diameter or less. When the service line is installed by direct bury, the ditch will be cut with either a backhoe/mini excavator or a trencher. The trench from a bucket on a backhoe/mini excavator will be 12 to 14 inches, while the trencher width will be 6 inches.
If the exact location where new pipe would be installed or where other work would occur, provide the width of the ROW or the general area encompassing the footprint where all work would occur. Include the anticipated footprint and depth of new pipe installation.	The Kaw City Municipal Gas System is located in and around Kaw City, which is outside of Ponca City, Oklahoma. The existing pipelines lay in the road right of way. This ROW is 25 feet in width on either side of the center of the road. The utilities all lay in the green area of the

	road right of way (approximately 12 to15 feet). Standard construction practices have the service line run from a tap on the main and run to the edge of the road ROW. Any acquisition of new right of way or easement would adhere to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
Will service lines be replaced? If so, include a map(s) depicting the location of service line replacements.	Yes.
Will meters or other equipment be replaced? If so, provide a description detailing what meter components and associated equipment that will be replaced and indicate if this will require ground disturbance, if the equipment will be attached to existing structures, etc.	No.
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.	The current service lines will be abandoned in place and replaced with the new.

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.	No new right-of-way or easement needed
How many linear feet of pipe will be replaced or repaired?	12,300.00 linear feet

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.
3,060	1.00	Bare steel	60.00		Unknown
9,240	1.00	Plastic	60.00		Unknown

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	
Question	**Information and Justification**
Is the project located in an area designated by the EPA as non-attainment or maintenance status for one or more of the National Ambient Air Quality Standards (NAAQS)?	No, the project area is located in Kay County, Oklahoma which is designated by the EPA as in attainment for all NAAQS based on EPA's Greenbook. [1]
Will the construction activities produce emissions that exceed de minimis thresholds (tons per year)?	No.
Will mitigation measures be used to capture blowdown? (Blowdown refers to the venting of natural gas in current facilities, in order to begin rehabilitation, repair, or replacement activities).	Yes. The primary method to prevent methane emissions during the construction process will be to reduce the amount of methane present in lines to be abandoned by pulling the methane into downstream systems.
Will project proponent commit to reducing pressure on the segments/lines to be replaced, prior to venting?	No.
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 natural gas leakage.	The existing leak rate is estimated to be 1,565 kilograms (kg)/year(yr). Replacement of pipelines would result in a leak rate of approximately 1,498 kg/yr or a reduction of approximately 29,958 kg over a 20-yr timeframe.
Is there any other information relevant to the project area or the proposed work as it pertains to Air Quality?	No.

[1] Criteria Air Pollutants | US EPA

Conclusion:

The project area is located in Kay County, Oklahoma, which is designated by the EPA is 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 natural gas 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. The City of Kaw City will commit to preventing natural gas emissions during the construction process by pulling the natural gas into downstream systems. During project construction, there will be some increase in ambient dust particulate from machinery and soil disturbances. These will be only temporary in nature and all efforts will be made through proper construction methods to ensure dust control and properly functioning equipment. Replacing leak prone pipe with newer, more durable materials will result in the overall reduction of leaking natural gas. Therefore, it is PHMSA's assessment that the proposed project would provide a net benefit to air quality from the overall reduction of leaking natural gas and that no adverse indirect or cumulative impacts would result from the project.

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; and
- The City of Kaw City will commit to preventing methane emissions during the construction process by pulling the methane into downstream systems.

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)	Yes, according to United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI), and Federal Emergency Management Agency (FEMA) maps, one water body occurs near or within the project area. The Arkansas River (Kaw Lake) borders Kaw City to the north, south and, east of the project area. No wetland areas are indicated within the project area. Part of the project would be located within FEMA Flood Zone A. No impact would occur as ground disturbance in these areas would be temporary and not cause any fill on a floodplain.
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 disturbed pipeline and roadway ROW and all pipeline work would be replacement work so no additional impacts are anticipated.
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.	No.
Will work activities take place within a FEMA designated floodplain? If so, describe any permanent or temporary impacts and the required coordination efforts with state or local floodplain regulatory agencies.	FEMA's flood maps[2] indicate the project area is located in FEMA Flood Zone A. Areas designated as Zone A are considered Special Flood Hazard Areas and correspond to the one percent annual chance of flooding (100-year floodplain).

[2] FEMA Flood Map Service Center | Welcome!

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.
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. The Arkansas River is located to the north, south, and east of the project area. According to NWI, no wetlands or open waters occur within the project area. A small portion of the project area along Old Kaw Drive falls in Zone A. 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. There would be temporary impacts from directional boring, cut and cover (trenching) and excavation activities; however, all areas would be restored to pre-construction contours and conditions and there would be no permanent impacts. 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; and
- 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.	Yes, there is a possibility of encountering groundwater while trenching for gas mains and services, though unlikely. No impact is expected as no hazardous materials would be in contact with the groundwater. Construction would involve the placement of pipe bedding or use of native materials in the trenches.

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.	The project may involve horizontal directional drilling and may require pits. Construction crews would be required to contain all inadvertent returns of drilling fluids via pits, vacuum truck, or other methods and dispose of them properly.
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 or what mitigative measures will be used to avoid identified sites.	No. Based on review of EPA's NEPAssist tool, no hazardous waste sites were identified near 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?	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 superfund sites. There were no hazardous waste sites identified near 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 soil management plans; and
- 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 or critical habitat potentially occurring within the geographic range of the project area?	Yes, based on review of the USFWS's Information for Planning and Consultation (IPaC), there is some potential for federally threatened or endangered species or critical habitat to occur within the geographic range of the project area. In addition, Oklahoma Department of Wildlife Conservation state 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.	There are listed endangered or threatened species potentially within the vicinity of the project area but 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. Therefore, no endangered or threatened species are expected to 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:

- Peppered chub (Macrhybopsis tetranema): endangered
- Alligator snapping turtle (Macrochelys temminckii): proposed threatened
- Piping plover (Charadrius melodus): threatened
- Monarch butterfly (Danaus plexippus): proposed threatened
- Rufa red knot (Calidris canutus rufa): threatened
- American burying beetle (Nicrophorus americanus): threatened

There was no critical habitat identified within the project area.

Several state-listed species also occur within the geographical range, however based on the previously disturbed nature of the project area, no habitat is present for these species

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 (pipeline 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. Therefore, in accordance with Section 7 of the Endangered Species Act (ESA), PHMSA's assessment is that the project would have no effect to the peppered chub, piping plover, rufa red knot. Under Section 7(a)(4) of the ESA, federal agencies must confer with the USFWS if their action would jeopardize the continued existence of a proposed species; therefore, PHMSA's assessment is that the project is unlikely to jeopardize the continued existence of the Alligator snapping turtle or monarch butterfly. PHMSA's assessment is that the project would have no adverse impacts to state-listed species and would not cause more than minor 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 pipelines are located in the City of Kaw's right of ways and beneath the roadway. During boring, the ground will only be disturbed where the existing service line runs from the main to the above-ground meter. The bell hole for the tie-in will be 4 to 5feet in diameter. The bell hole at the service riser end will be smaller, but it must have sufficient room to remove the old riser and to allow the new riser to be tied into the existing customer-owned service riser. This bell hole is anticipated to be 2 feet in diameter or less. When the service line is installed by direct bury, the ditch will be cut with either a backhoe/mini excavator or a trencher. The trench from a bucket on a backhoe/mini excavator will be 12 to 14 inches, while the trencher width will be 6 inches.
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, ground disturbance would take place entirely in existing ROW or utility easements. Yes, there would be some disturbance in grassy areas for replacement of service pipes.
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.	Yes. Existing water, sewer, and telephone have been installed underground within the project area. While grassy areas would be disturbed, those grassy areas have already been previously disturbed.
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 a map showing the locations.	No.

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 or captions to identify where the photos were taken and what they are showing.	The project area is scattered throughout the east and west ends of Kaw City. The area is a mixture of residential and commercial. Properties are both old and modern.
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.	No.
Are there any nearby properties or resources that either appear to be or are documented[3] to have been constructed more than 45 years ago? 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.	No, there are no nearby properties or resources that either appear to be or are documented to have been constructed more than 45 years ago. There are residential homes that appear to be of similar age, design, or method of construction. There are no designed landscapes near or adjacent to the project area.
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.	No.

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

Is there any other information relevant to the project area or the proposed work as it pertains to Cultural Resources?	No.

Conclusion:

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 Oklahoma Historical Society. 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 March 12, 2025, to the Oklahoma 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. Concurrence was received from the Oklahoma Historical Society on March 14, 2025.

PHMSA also invited the following federally recognized tribes to participate in consultation by separate letter on March 12, 2025:

- Apache Tribe of Oklahoma
- Cherokee Nation
- Cheyenne and Arapaho Tribes, Oklahoma
- Kaw Nation, Oklahoma
- Osage Nation
- Tonkawa Tribe of Indians of Oklahoma
- Wichita and Affiliated Tribes (Wichita, Keechi, Waco & Tawakonie), Oklahoma

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 City of Kaw City 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 City of Kaw City 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 City of Kaw City 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 a map of 4(f) properties as an attachment.	No.

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, the project would not intersect with or be adjacent to any public parks.
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.	No.
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 will be no use of Section 4(f) resources.

Mitigation Measures:

No mitigation measures needed.

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.	Yes, all work would take place within the existing ROW.

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?	No It is not anticipated that transportation restrictions or adverse impacts will occur during this project. Construction for the project is anticipated to last 3 months.
Will there be any permanent change to existing transportation facilities? If so, what are the changes, and how would the 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. Any impacts will be coordinated with local and state agencies.

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.); and
- 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 feet) 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, construction would take place near residences and churches. Anticipated construction would take place during normal working hours.
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.	No applicable ordinances were identified for the project area.
Will construction activities require large bulldozers, hoe ram, or other vibratory equipment within 20 feet of a structure?	No.
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 Kaw City. Ambient noise consists of a combination of environmental noise primarily 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. Construction for the project is anticipated to last 3 months. There are numerous sensitive noise receptors (*e.g.*, residences, schools, houses of worship) 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 limited to daytime hours. 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; and
- Minimize the use of generators or use quiet generators to power equipment.

Mitigation Measures:

- Limit construction activities to daylight hours.

Community Effects	
Question	**Information and Justification**
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, temporary disruption to services is expected when switching over the customers service lines. It is planned to use letters, place cards, text messages and phone calls to communicate with residents
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 Community Effects?	No.

Conclusion:

The proposed project would result in an overall reduction in leaking natural gas pipelines. 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. PHMSA determined the project would not impact the local community.

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; and
- 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).
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.
Does the project area include pipes prone to leakage?	Yes, the pipes schedules for replacement under this project are aging leak prone pipes.

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. The project will adhere to the Kaw City Safety Management System.
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 leakage from the natural gas pipeline system and would also benefit the local community with the safe provision of natural gas. The project responds to the need to address the aging and leaky 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 CFR 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; and
- 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, 2024[4] 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 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

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

5. Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species.

Compliance Action:

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:

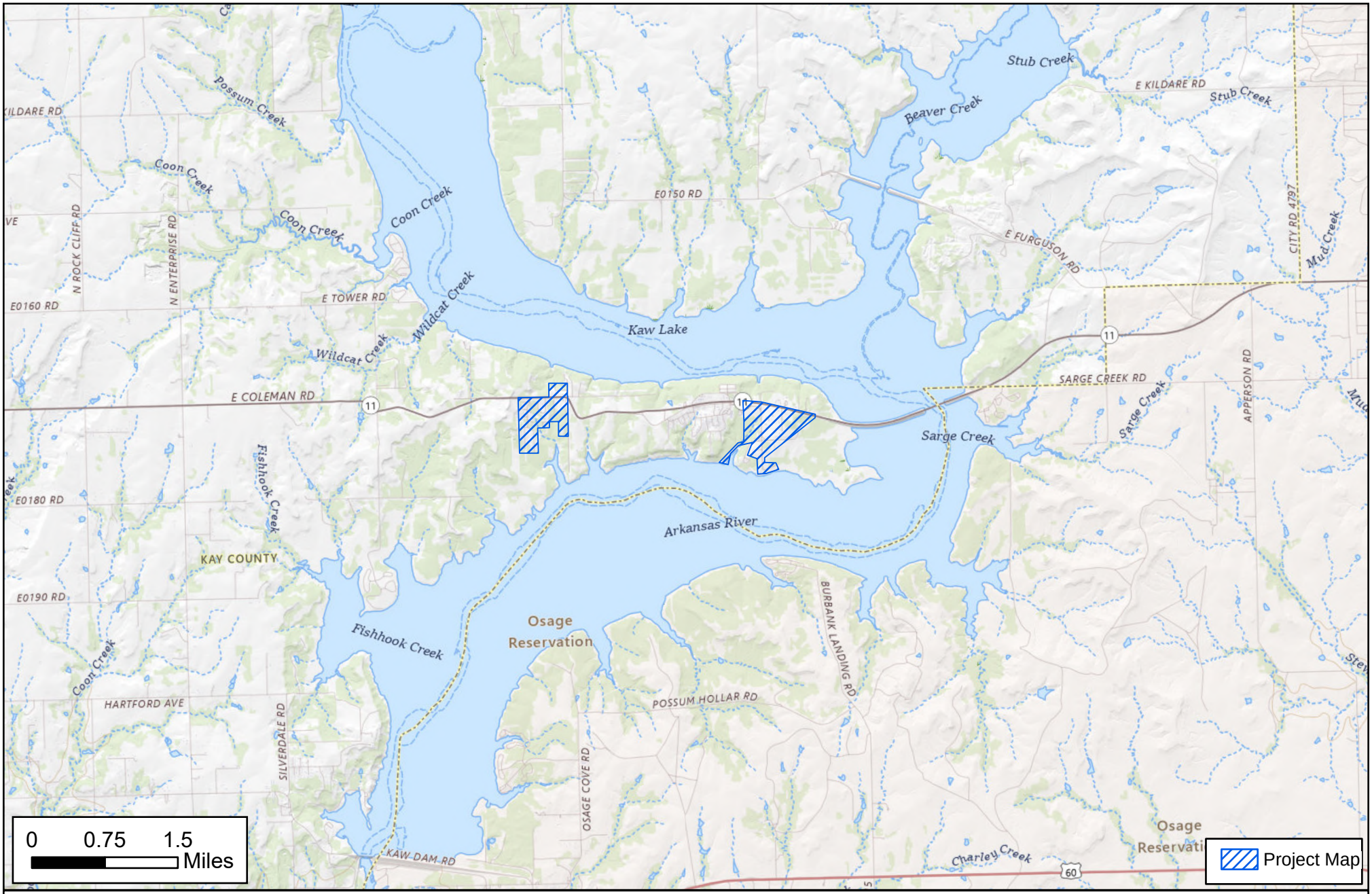
AMANDA LAUREN MURPHY

Digitally signed by AMANDA LAUREN MURPHY
Date: 2025.05.19 10:35:25 +02'00'

Appendix A

Project Map

Project Area Map



Name: Kaw City Gas Line Replacement
Scale: 80,000
Total Acreage: 350.4
Kaw City, Osage County, Oklahoma

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