



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

1200 New Jersey Avenue, SE  
Washington, DC 20590

**September 19, 2025**

**MEMO TO FILE**

**From:** Amanda L. Murphy  
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**Subject: Categorical Exclusion Determination  
Eastern New Mexico Natural Gas Association, NGDISM-FY24-CE-2025-10**

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**PROPOSED ACTION**

The Pipeline and Hazardous Materials Safety Administration (PHMSA) reviewed the materials submitted by the Eastern New Mexico Natural Gas Association (Sponsor) to support the environmental review by PHMSA for the meter replacement project in the Village of Floyd, New Mexico (the Project). See Attachment A for a map of the project area. PHMSA understands the Project includes the removal and replacement of one (1) underground odorant tank. The underground odorant tank will be replaced with a new above-ground tank and associated injection system, which includes a 20-gallon odorant tank and a new meter station. Approximately 20 feet of new piping will be installed above ground to connect the new odorant tank and injection system. No new underground piping will be installed and the underground odorant tank and its associated connection lines will be removed. The construction will be completed within existing rights-of-way and easements.

**APPLICABLE CATEGORICAL EXCLUSION**

*C(5): Repair, rehabilitation, or replacement of natural gas distribution pipelines and associated equipment within existing rights-of-way or easements.*

**EXTRAORDINARY CIRCUMSTANCES**

Based on the scope of the action, PHMSA has determined that the proposed action does not meet the criteria for extraordinary circumstances listed in DOT 5610.1D.

## RESOURCE REVIEW

**Air Quality:** The Project falls within Roosevelt County, New Mexico which is designated by the EPA as in attainment for all National Ambient Air Quality Standards (NAAQS) based on the EPA Greenbook.<sup>1</sup> Replacing leak prone infrastructure, such as an odorant tank, with newer, more durable materials will result in the overall reduction of risks from leaking natural gas. Therefore, it is PHMSA's assessment that the proposed project would have no adverse impacts on air quality.

The removal of the leaking underground odorant tank will eliminate uncontrolled emissions of mercaptan, a sulfur compound used for gas odorization. Although not a criteria pollutant under NAAQS, mercaptan releases can contribute to nuisance odors and localized air quality concerns which can lead to health issues like respiratory irritation, headaches, and nausea when at high concentrations. The new above-ground odorant tank and injection system will be fully sealed and monitored during the removal process, improving containment measures and reducing the risk of air quality impacts.

**Cultural Resources:** PHMSA sent a consultation letter to the New Mexico State Historic Preservation Office (SHPO) on August 12, 2025 with PHMSA's determination of a finding of no adverse effect under Section 106 of the National Historic Preservation Act. The New Mexico SHPO concurred with the findings presented by PHMSA on September 11, 2025. PHMSA also invited federally recognized tribes to participate in consultation by separate letter on August 12, 2025. None of these tribes have elected to participate in the process or provided comments.

**Section 4(f):** The Project would not result in a use of a property protected by Section 4(f) of the Department of Transportation Act.

**Biological Resources:** The Project would have no effect on any Endangered Species Act listed species or designated critical habitat, or on any essential fish habitat as outlined in the Magnuson-Stevens Fishery Conservation and Management Act.

**Land Use:** The Project is not located within a coastal management zone under the Coastal Zone Management Act.

The Sponsor must implement all mitigation and other commitments identified in Attachment B. In addition, the Sponsor is responsible for securing all necessary permits, approvals, and authorizations.

## DETERMINATION

Based on a review of the information and documentation submitted by the Sponsor, including review of Extraordinary Circumstances, PHMSA finds the proposed action qualifies as a Categorical Exclusion in accordance with Section 102 of the National Environmental Policy Act, 42 U.S.C. § 4332 and DOT Order 5610.D, Departmentwide National Environmental Policy Act Implementing Procedures.

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<sup>1</sup> <https://www.epa.gov/green-book>

**Approval by Environmental Analysis and Compliance Division:**

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**Attachment(s):**

- Attachment A: Project Area Map
- Attachment B: Mitigation and Other Commitments

## Attachment A: Project Area Map



Eastern New Mexico Natural Gas Association Project

## **Attachment B: Mitigation and Other Commitments**

### **Air Quality**

- 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 practical;
- Minimize all vehicle idling and at minimum, conforming with 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 Part 85, 86, and 89);
- Cover open-bodied truck while transporting materials;
- Use water or other approved dust suppressants at the 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 busses, as necessary; and
- Minimize the idling of equipment.

### **Water Resources**

- Avoid staging and laydown areas in wetlands or floodplains;
- Restore any disturbed areas to pre-construction contours;
- Adhere to additional mitigation measures in accordance with applicable permits; and
- Use best management practices during construction to control sediment and erosion and prevent any pollutants from entering adjacent waterways.

### **Groundwater and Hazardous Materials/Waste**

- Develop and adhere to a Stormwater Pollution and Prevention Plan;
- Avoid boring or drilling, staging, and laydown areas within EPA superfund sites or areas containing known wastes;
- Adhere to applicable groundwater and/or soil management plans; and
- In the event that mercaptan is inadvertently released during tank installation activities, the Eastern New Mexico Natural Gas Association shall immediately contact the New Mexico Environment Department for further guidance.

### **Cultural Resources**

- 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 Eastern New Mexico Natural Gas Association will immediately

notify PHMSA. This may include discovery of cultural features (*e.g.*, foundations, water wells, or trash pits) or artifacts (*e.g.*, pottery, stone tools and flakes, or animal bones) 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 Eastern New Mexico Natural Gas Association 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 Eastern New Mexico Natural Gas 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; and
- All work, material, equipment, and staging will remain within the parcel located approximately 0.3 miles north of Highway 267 on Roosevelt Road (34.187225,-103.475183) or within the road or utility's existing ROW. Any staging areas outside of the existing road ROW should be confined to paved areas; if staging cannot be confined to paved areas, geotextile fabric or other similar protective measures (such as pressure distributing mats) will be laid in any affected unpaved area to minimize ground disturbance, prevent soil compaction, and protect archaeological features and artifacts.

### **Land Use and Transportation**

- Restore all impacted areas to pre-construction conditions;
- Maintain traffic flows to the extent possible;
- Use traffic control measure 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**

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

**Community Effects**

- Provide advanced notification of service disruptions and construction schedules to all affected parties including residents and businesses adjacent to the project area;
- Coordinate service disruptions and construction schedule with local community leader and groups, as applicable; and
- Maintain service at temporary facilities, if appropriate.

**Safety**

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