CHECKLIST ENVIRONMENTAL ASSESSMENT

Project Name:	Phillips 66 Seminoe Pipeline Easements
Proposed Implementation Date:	April 2015
Proponent:	Phillips 66 Pipeline LLC
Location:	Sections 2 and 11, Township 1South, Range 26 East (Yellowstone River – Public Land Trust)
County:	Yellowstone County

I. TYPE AND PURPOSE OF ACTION

Phillips 66 Pipeline LLC (Phillips 66) is proposing to install a new segment of the Seminoe Pipeline which consists of an 8-inch diameter petroleum pipeline located underneath the navigable riverbed of the Yellowstone River in Sections 2 and 11-T1S-R26E in Yellowstone County within a new 30' wide by ±1,122' long easement encompassing ±0.77 acres. The new section of pipeline will be installed by Horizontal Directional Drilling (HDD) and would be located at least 40' below the riverbed along its length, except for the far north/west end where the depth will be ±36'. The north/west end of the river crossing has been the most problematic in recent years, as there is a scour hole developing in this area and the depth of cover over the pipeline has fluctuated between 2.5' to 6.6' during inspections conducted from 2011-2014.

The original Seminoe pipeline was installed in this reach of the Yellowstone River in the 1963 and was in service until the floods of 1974 which exposed the east/south portion of the pipeline. This reach of the Yellowstone River contains a large island which existed at statehood and was therefore federally owned. The ownership of the island was transferred to the City of Billings in the early 1970s and Phillips 66 obtained a new easement from the City in late 1974 for the pipeline replacement that was completed in 1975. Phillips 66 never obtained an easement from the State of Montana for the either the 1963 or 1975 pipeline crossings. However, they have applied now for easements for the two existing pipelines which are both 30' in width and 314' and 1,282' in length, respectively. The 1963 easement would encompass ±0.22 acres, while the 1975 easement encumbers ±0.88 acres.

Following the floods of 2011, Phillips 66 conducted a depth of cover analysis of the Seminoe pipeline and found a scour hole developing near the north/west shore. This was resulting in reduced depth of cover near the pipeline and at the time a request was made to place grout bags over the pipeline to protect it from potential debris and/or further exposure. The Montana DEQ allowed the request with the stipulation that the pipeline be replaced within one year. Phillips 66 never placed the grout bags and instead obtained a Land Use License from the DNRC in 2012 to dig some test pits along the pipeline corridor, mainly on the city-owned island, to try and determine the depth to bedrock of the existing 1975 pipeline. Based on the results of information obtained from the test pits and other factors, Phillips 66 filled out an easement application in 2013 but it was never finalized and submitted to the State.

In February and March of 2015, Phillips 66 submitted two easement applications to the DNRC. The first would legalize the existing pipelines that are currently in the Yellowstone riverbed through 30' wide easements for: 1) the partial 1963 pipeline that generally remains in the west half of the river and 2) the existing active 1975 Seminoe pipeline, which is proposed to be abandoned in place if the HDD easement is approved. The second easement application was for a new HDD pipeline that would replace the 1975 pipeline. The new HDD line would be located in bedrock that would provide protection from river scour and along most the easement corridor the pipeline would be at least 40' below the current riverbed, except for a short stretch near the north/west boundary where it would be ±36'. Additionally, Phillips 66 has been working with the city of Billings to obtain a new easement for the HDD pipeline and it is currently scheduled to be on the 23 March 2015 Billings City Council agenda.

This portion of the Yellowstone River is constrained on the east side by a steep rimrock face and armoring/rip rap on the west side of the river. The main channel of the river has gradually shifted from the channel that is east/south of the island to the channel that is north/west of the island. It is also critical to note that the municipal water intake for the City of Billings is located approximately 0.25 miles downstream of the Seminoe Pipeline.

Based on information submitted to the DNRC by Terracon on behalf of Phillips 66, after the test pits were dug in 2012 and other data that was collected regarding the active 1975 pipeline, it appears that this pipeline was placed below bedrock in the east/south channel, but is located above the bedrock on the west/north channel. This was likely due to the fact that the east/south channel was the main channel when the new pipeline was installed in 1975 and at the time required greater protection. The most recent depth of cover study was conducted in October of 2014 and it indicated a cover of approximately 6.7'. As can be expected on a dynamic river like the Yellowstone, the depth of cover will fluctuate based on the time of year it's measured and the flow and activity of that particular year.

The Horizontal Directional Drilling (HDD) will utilize an entry point on the west side of the Yellowstone River in Mystic Park. The new pipeline will exit on the east side on the river on privately-owned land. The HDD technique will allow the new pipeline to be located at an increased depth and decrease surface disturbance. Additionally, it will minimize areas of open-cut trenching to areas above the high water mark that connect the new pipeline segment to the existing facility. Additionally, the easements on the 1963 and 1975 pipelines will legalize their location in the state-owned riverbed and provide for state oversight of their monitoring.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED:

Provide a brief chronology of the scoping and ongoing involvement for this project.

The DNRC did not perform any formal public scoping for this project. However, the Southern Land Office did attempt to contact Montana Fish, Wildlife and Parks, and the US Army Corps of Engineers to get their opinion on whether the old pipeline should be abandoned in place or removed, as well as any comments on the new HDD pipeline. Additionally, the SLO has been in contact with the City of Billings Public Works Department regarding the proposed new easement and the existing pipeline as it crosses through both City and State ownership.

2. OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:

Yellowstone Conservation District: 310 Permit (Approved the HDD pipeline)
US Army Corps of Engineers: Section 404 Permit (Pending)
Yellowstone County Floodplain Permit (Pending)

3. ALTERNATIVES CONSIDERED:

No Action Alternative: Deny the requests to issue easements to: 1) permit the installation of a new segment of the Seminoe pipeline under the bed of the Yellowstone River via Horizontal Directional Drilling (HDD) and 2) legalize the 1963 pipeline and 1975 pipeline.

Proposed Alternative: Issue a 30-year term easement to permit the installation of a new 8-inch pipeline under the bed of the Yellowstone River through the use of Horizontal Directional Drilling (HDD). Utilization of the HDD method would permit the pipeline to be installed approximately 40' beneath the riverbed. Additionally, a 20-year term easement would be issued for the 1963 and 1975 pipelines and require that depth of cover analysis be conducted and submitted to the DNRC at least every 5 years and that either pipeline be removed if it becomes exposed and/or a hazard to river navigation.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

4. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE:

Consider the presence of fragile, compactable or unstable soils. Identify unusual geologic features. Specify any special reclamation considerations. Identify any cumulative impacts to soils.

The proposed alternative would permit the use of Horizontal Directional Drilling (HDD) to install a new segment of pipeline approximately 40' below the bed of the Yellowstone River, except for a short stretch on the west end of the pipeline that would be ±36'. The project would have an entry point in Mystic Park, which is owned by the city of Billings and exit on private land on the east side of the river. Any impacts to state-owned land would be from the boring of the new pipeline route under the riverbed. No significant adverse impacts are expected to geology and soil quality by implementing the proposed alternative.

5. WATER QUALITY, QUANTITY AND DISTRIBUTION:

Identify important surface or groundwater resources. Consider the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality. Identify cumulative effects to water resources.

The proposed alternative would allow for the new pipeline segment to be installed via Horizontal Directional Drilling (HDD). The use of HDD would limit the adverse impacts to water quality and quantity by allowing for the facility to be located approximately 40 feet below the bed of the Yellowstone River in a layer of shale bedrock which would provide additional protection for the pipeline from scouring of the river bottom. The existing Seminoe pipeline is located approximately 0.25 miles upstream of the Billings municipal water intake and the installation of a new deeper pipeline with better protection from scouring would reduce the chances of a rupture and the contamination of the municipal water system.

Short term impacts from the construction/drilling operation are not expected to have significant adverse impacts. Phillips 66 will be required to follow Montana Best Management Practices (BMP) for stormwater runoff, as well as permitting requirements from the Montana Department of Environmental Quality. This would include installing erosion control and sediment control devices to prevent topsoil from reaching the river.

The DNRC is recommending that the existing 1963 and 1975 pipeline be allowed to remain. The 1975 would be abandoned in place once the new HDD line is active and the pipeline will be required to have a depth of cover analysis performed at least every 5 years (or as soon as practical following a flood event) and that either pipeline would be required to be removed if it becomes exposed and/or a hazard to river navigation. If the Land Board approves the abandonment in place of the 1975 pipeline, Phillips 66 is proposing that *"[i]n-place abandonment would involve purging and swabbing all product from the line and then filling with a weak flowable sand/cement mixture. Over time, without cathodic protection, the pipe will eventually degrade and the flowable fill will become part of the river bed. The purged and grouted pipe would remain on the floor of the river bed and continue to degrade."*

6. AIR QUALITY:

What pollutants or particulate would be produced? Identify air quality regulations or zones (e.g. Class I air shed) the project would influence. Identify cumulative effects to air quality.

The proposed alternative would require the operation of construction machinery including but not limited to a HDD drill rig, trackhoe and miscellaneous support trucks, including a water truck. Not all machinery would be operating at the same time. The entire project is expected to last approximately 4-6 weeks, with the actual HDD process taking about 1 week of that timeframe. The proposed alternative would be of a relatively short duration and is not expected to have significant long term adverse impacts to air quality.

7. VEGETATION COVER, QUANTITY AND QUALITY:

What changes would the action cause to vegetative communities? Consider rare plants or cover types that would be affected. Identify cumulative effects to vegetation.

The proposed alternative would result in a new pipeline segment being bored ±40' under the existing riverbed and would not result in any vegetation disturbance on state-owned land. No significant impacts to vegetation cover, quantity or quality are expected by implementing the proposed alternative.

8. TERRESTRIAL, AVIAN AND AQUATIC LIFE AND HABITATS:
Consider substantial habitat values and use of the area by wildlife, birds or fish. Identify cumulative effects to fish and wildlife.

A variety of big game, small mammals, raptors and songbirds may traverse this area. The noise from the drill rig could disperse or cause wildlife to temporarily avoid the area. No significant impacts to terrestrial, avian and aquatic life and habitats are expected to occur as a result of implementing the proposed alternative.

9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES:
Consider any federally listed threatened or endangered species or habitat identified in the project area. Determine effects to wetlands. Consider Sensitive Species or Species of special concern. Identify cumulative effects to these species and their habitat.

A proposed project area search of the Montana Natural Heritage Program database identified fourteen animals listed as a species of concern or threatened species: Great Blue Heron, Peregrine Falcon, Pinyon Jay, Veery, Loggerhead Shrike, Brewer's Sparrow, Yellowstone Cutthroat Trout, Sauger, Little Brown Myotis, Spotted Bat, Spiny Softshell, Greater Short-horned Lizard, Plains Hog-nosed Snake and Western Milksnake.

The proposed action would result in a new pipeline being bored under the state-owned riverbed and would not result in any surface disturbance on state-owned land. The project would have an entry point in Mystic Park, which is owned by the city of Billings and exit on private land on the east side of the river. The Billings municipal water treatment plant is located immediately to the north, while there is a scattering of residential and commercial uses to the west and south, beyond the park. Due to the relatively short duration of the project, the proposed action is not expected to have a significant adverse impact on any of the species listed above.

10. HISTORICAL AND ARCHAEOLOGICAL SITES:
Identify and determine effects to historical, archaeological or paleontological resources.

The portion of the pipeline that is under state ownership will be approximately 40' below the river bed of the Yellowstone River. No significant adverse impact to historic and archaeological sites on state-owned land is expected as a result of implementing the proposed alternative.

11. AESTHETICS:
Determine if the project is located on a prominent topographic feature, or may be visible from populated or scenic areas. What level of noise, light or visual change would be produced? Identify cumulative effects to aesthetics.

The pipeline crosses the Yellowstone River near the northeast corner of Mystic Park, just upstream of the Billings municipal water intake and water treatment plant. The HDD entry point will be in Mystic Park on the west side of the Yellowstone River and will exit on the east side on privately owned land. The proposed activates will be very visible to users of Mystic Park and the nearby residences and businesses.

Based on previous HDD requests, it is estimated that noise levels from the proposed action will be between 65-70 dBA. This level is loud enough that it could impact speech for park and recreation users. The closest residence is approximately 550' west of the HDD entry point and the hours of operation are expected to be from 7am-7pm, 6 days per week for approximately one week of drilling. The remaining construction time would be setup and takedown along with a week of tying in the new line with the existing facility on each side of the shore. There would also be work on the eastern side of the river, which is predominantly grazing land.

Implementation of the Proposed Alternative would cause minor temporary short term impacts to aesthetics during the pipeline construction due to visual impacts and noise from the HDD drill rig and other heavy equipment. The actual HDD process is expected to take approximately 1 week and the entire project about 4-6 weeks. The proposed action would add to the existing noise levels, but this temporary addition is not expected to cause a significant adverse impact.

12. DEMANDS ON ENVIRONMENTAL RESOURCES OF LAND, WATER, AIR OR ENERGY:
Determine the amount of limited resources the project would require. Identify other activities nearby that the project would affect. Identify cumulative effects to environmental resources.

Implementation of the Proposed Alternative is not expected to have a significant adverse impact on environmental resources of land, water or energy.

13. OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:
List other studies, plans or projects on this tract. Determine cumulative impacts likely to occur as a result of current private, state or federal actions in the analysis area, and from future proposed state actions in the analysis area that are under MEPA review (scoped) or permitting review by any state agency.

Other permits that are required by other local, state or federal agencies or departments for the proposed project are listed above in Section 2 of this EA. There are no other known future government actions planned for this reach of Public Land Trust property.

IV. IMPACTS ON THE HUMAN POPULATION

- *RESOURCES potentially impacted are listed on the form, followed by common issues that would be considered.*
- *Explain POTENTIAL IMPACTS AND MITIGATIONS following each resource heading.*
- *Enter "NONE" If no impacts are identified or the resource is not present.*

14. HUMAN HEALTH AND SAFETY:
Identify any health and safety risks posed by the project.

Implementation of the Proposed Alternative would provide for increased health and safety by taking a pipeline that currently has some risk of exposure, especially near the scour hole on the north/west end of the line, out of service before there is an incident that would cause an oil spill in the Yellowstone River, upstream from the raw water intake for the Billings municipal water system.

The DNRC is recommending that the existing 1963 and 1975 pipeline be allowed to remain and they would be legalized through the issuance of a 20 year term easement. The 1975 pipeline would be abandoned in place once the new HDD line is active and the pipeline will be required to have a depth of cover analysis performed at least every 5 years (or as soon as practical following a flood event) and that the pipeline would be required to be removed if it becomes exposed and/or a hazard to river navigation. If the Land Board approves the abandonment in place of the 1975 pipeline, Phillips 66 is proposing that *"[i]n-place abandonment would involve purging and swabbing all product from the line and then filling with a weak flowable sand/cement mixture. Over time, without cathodic protection, the pipe will eventually degrade and the flowable fill will become part of the river bed. The purged and grouted pipe would remain on the floor of the river bed and continue to degrade."*

15. INDUSTRIAL, COMMERCIAL AND AGRICULTURE ACTIVITIES AND PRODUCTION:
Identify how the project would add to or alter these activities.

Implementation of the Proposed Alternative would allow the Seminoe pipeline to remain fully operational once the HDD is complete and the new segment is connected to the existing system. If a new segment is not installed and the pipeline became exposed, the US DOT PHMSA could require that it be shut down during high water events so that there is not a release of petroleum into the Yellowstone River if the facility were to rupture.

16. QUANTITY AND DISTRIBUTION OF EMPLOYMENT:
Estimate the number of jobs the project would create, move or eliminate. Identify cumulative effects to the employment market.

Implementation of the Proposed Alternative would not have a significant impact to quantity and distribution of employment.

17. LOCAL AND STATE TAX BASE AND TAX REVENUES:
Estimate tax revenue the project would create or eliminate. Identify cumulative effects to taxes and revenue.

Implementation of the Proposed Alternative is not expected to have a significant impact on local and state taxes since it would only replace an existing segment of the Seminoe Pipeline.

18. DEMAND FOR GOVERNMENT SERVICES:
Estimate increases in traffic and changes to traffic patterns. What changes would be needed to fire protection, police, schools, etc.? Identify cumulative effects of this and other projects on government services

Implementation of the Proposed Alternative is not expected to have a significant adverse impact on the demand for government services.

19. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS:
List State, County, City, USFS, BLM, Tribal, and other zoning or management plans, and identify how they would affect this project.

Implementation of the Proposed Alternative will not conflict with any locally adopted plans.

20. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES:
Identify any wilderness or recreational areas nearby or access routes through this tract. Determine the effects of the project on recreational potential within the tract. Identify cumulative effects to recreational and wilderness activities.

This section of the Yellowstone River is fairly actively used and there is a Fishing Access site at Coulson Park, which is located approximately 1.7 miles downstream of the pipeline crossing and another one further downstream approximately one-half mile on the east shoreline at the Lockwood water treatment plant site, near the Highway 87 Bridge. The project would likely close this portion of the River at least during the 1 week HDD process and may also result in a partial closure of Mystic Park around the area where the drill rig and other equipment would be located. This project could also result in the closure of the bike-pedestrian trail that comes within a few hundred feet of the HDD entry point in Mystic Park.

21. DENSITY AND DISTRIBUTION OF POPULATION AND HOUSING:
Estimate population changes and additional housing the project would require. Identify cumulative effects to population and housing.

Implementation of the Proposed Alternative is not expected to have a significant adverse impact to density and distribution of population and housing.

22. SOCIAL STRUCTURES AND MORES:
Identify potential disruption of native or traditional lifestyles or communities.

Implementation of the Proposed Alternative is not expected to have a significant adverse impact on social structures and mores.

23. CULTURAL UNIQUENESS AND DIVERSITY:
How would the action affect any unique quality of the area?

Implementation of the Proposed Alternative is not expected to have a significant adverse impact on cultural uniqueness or diversity.

24. OTHER APPROPRIATE SOCIAL AND ECONOMIC CIRCUMSTANCES:
Estimate the return to the trust. Include appropriate economic analysis. Identify potential future uses for the analysis area other than existing management. Identify cumulative economic and social effects likely to occur as a result of the proposed action.

The State will benefit by getting a fee of $10,200 ($150/rod x 68 rods) for the new 30 year HDD easement and a fee of $14,510 ($150/rod x 96.73 rods) for the 20 year 1963 and 1975 pipelines easement. Phillips 66 Pipeline also paid a $50 application fee. The Public Lands Trust is the beneficiary of this payment since it involves a navigable river.

EA Checklist Prepared By:	**Name:** Jeff Bollman, AICP	**Date:** 18 March 2015
	Title: Area Planner, Southern Land Office	

V. FINDING

25. ALTERNATIVE SELECTED:

The Proposed Alternative has been selected and it is recommended that:

- a 30-year term easement be granted to Phillips 66 for the purpose of installing an 8-inch diameter petroleum pipeline underneath the navigable riverbed of the Yellowstone River to replace a portion of the Seminoe Pipeline. This new pipeline segment will be installed by Horizontal Directional Drilling (HDD) and located approximately 40' below the river bed. The new pipeline easement will vary in distance from the existing pipeline, but at its greatest distance it will be approximately 175' downstream of the old pipeline.
- a 20 year term easement be granted to Phillips 66 for the existing 1963 and 1975 pipelines. Additionally, the DNRC is recommending that the existing 1975 would be abandoned in place once the new HDD line is active and the pipeline will be required to have a depth of cover analysis performed at least every 5 years (or as soon as practical following a flood event) starting in the fall of 2015 and that the pipeline would be required to be removed as expeditiously as possible if it becomes exposed. For the purposes of this stipulation, a flood event would be defined by either the gage height (13.5' or higher) or cubic feet per second (CFS) measurement at the USGS gage site in Billings (USGS Gage No. 6214500). If the Land Board approves the abandonment in place of the 1975 pipeline, Phillips 66 is proposing that *"[i]n-place abandonment would involve purging and swabbing all product from the line and then filling with a weak flowable sand/cement mixture. Over time, without cathodic protection, the pipe will eventually degrade and the flowable fill will become part of the river bed. The purged and grouted pipe would remain on the floor of the river bed and continue to degrade."*

26. SIGNIFICANCE OF POTENTIAL IMPACTS:

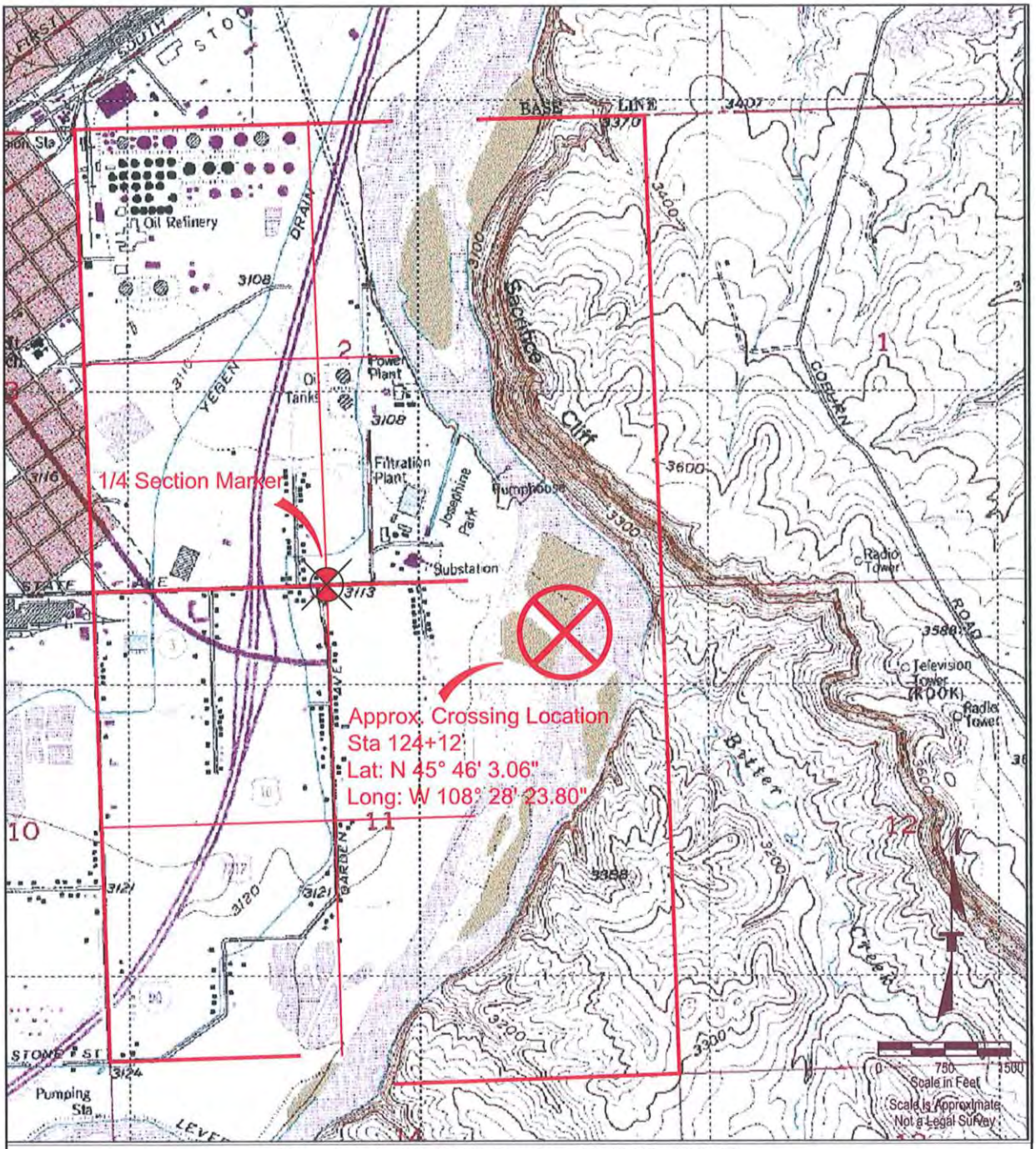
The potential for significant adverse impacts to Public Trust Lands (the navigable riverbed) are reduced by the nature of the Horizontal Directional Drilling technique that will be utilized and the depth (±40') beneath the existing riverbed that will be achieved. Many potential impacts listed above are short term and correspond with the construction project. There are no natural features or nearby species of concern noted that are expected to produce long term adverse impacts from the proposed alternative.

27. NEED FOR FURTHER ENVIRONMENTAL ANALYSIS:

[ ] EIS	[ ] More Detailed EA	[X] No Further Analysis

EA Checklist Approved By:	**Name:** Matthew Wolcott	
	Title: Area Manager, Southern Land Office	
Signature: /s/ Matthew Wolcott		**Date**: March 19, 2015

Attachment A – Location Map of Proposed Seminoe Pipeline Replacement Project



Crossing: NE/4 NE/4, Section 11, T.1S., R.26E.
Section Marker: S/4, Section 2, T.1S., R.26E.
USGS Quadrangle - Billings East

REV.	DATE	BY	DESCRIPTION

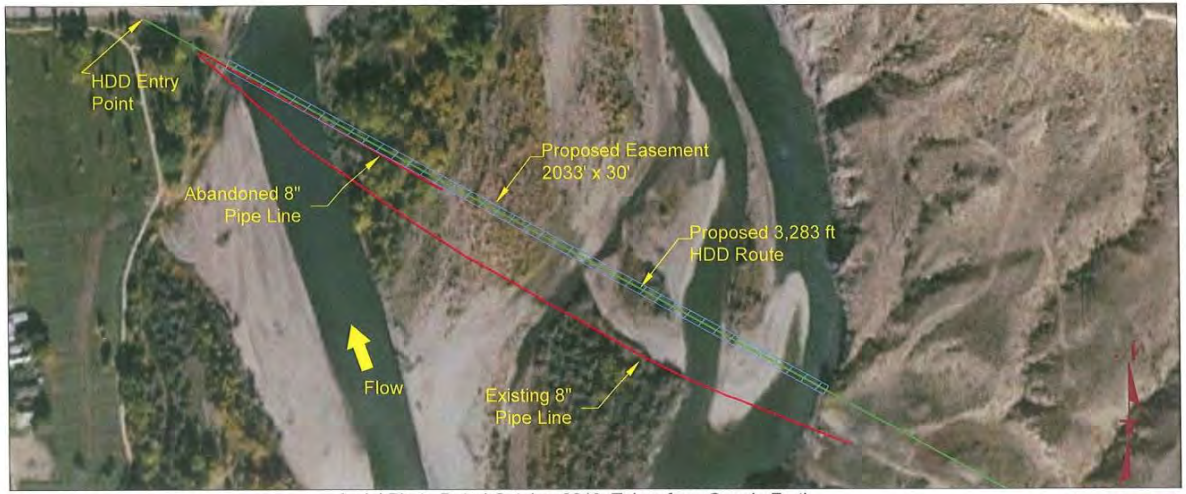
Terracon
Consulting Engineers and Scientists
2110 Overland Avenue, Suite 124 Billings, MT 59102
PH. (406) 656-3072 FAX. (406) 656-3578

Yellowstone River Topographic Map
Station 124+12 / AM 2.2
Phillips 66 Pipeline LLC
Seminoe 8" Pipe Line
Yellowstone County Montana

	1
DESIGNED BY:	DNebel
DRAWN BY:	ATorres
APPVD. BY:	GRome
SCALE:	As Shown
DATE:	January 2013
JOB NO.	26125052
FILE NAME:	2.2 Easement.dwg
SHEET NO.:	1 OF 2

Attachment B – View from west bank across Yellowstone River at Seminoe Pipeline Crossing Location

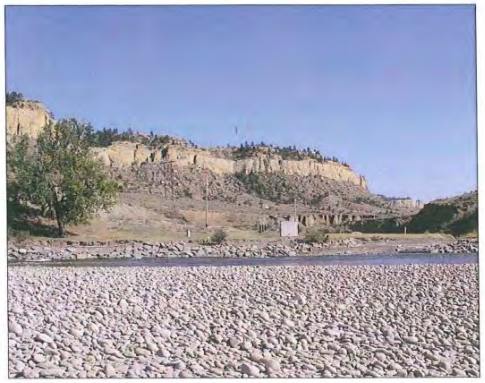
Attachment C – Site Detail and Cross Section of Proposed Horizontal Directional Drilling



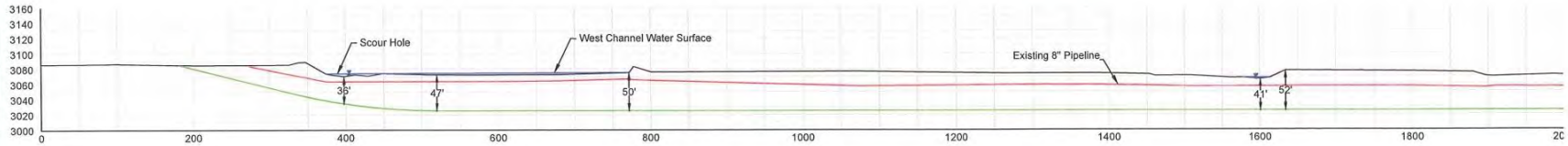
Aerial Photo Dated October 2013; Taken from Google Earth

The proposed easement for the existing pipe line is 30 feet wide, with a 15-foot offset on either side of the centerline stretching 2,033 feet resulting in a total area of approximately 1.4 acres.

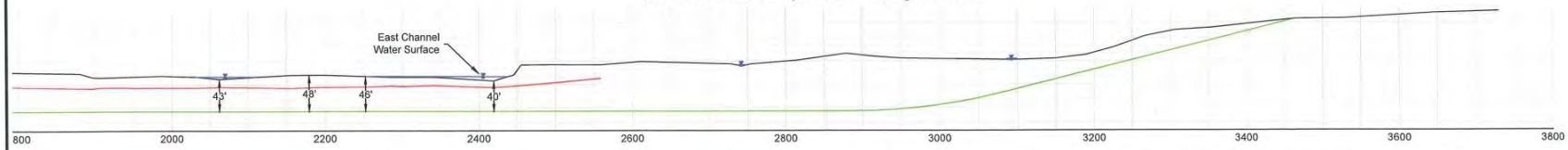
0 150 300
Scale in Feet
Scale is Approximate



View of the East Channel Crossing From the Gravel Bar, Looking Southeast Along Pipe



Cross Section View Of Proposed HDD, Looking Downstream



REV.	DATE	BY	DESCRIPTION
1	3.16.15	CAW	Added in Depth to HDD

Terracon
Consulting Engineers and Scientists
2110 Overland Avenue, Suite 124 Billings, MT 59102
PH. (406) 656-3072 FAX. (406) 656-3578

Yellowstone River Seminoe 2.2 - Site Detail
Station 124+12 / AM 2.2
Phillips 66 Pipeline LLC
Seminoe 8" Pipe Line
Yellowstone County Montana

3

DESIGNED BY:	DNebel
DRAWN BY:	CWright
APPVD. BY:	GRome
SCALE:	As Shown
DATE:	January 2013
JOB NO.	26125052
FILE NAME:	2.2 Easement.dwg
SHEET NO.:	3 OF 3

Attachment D – 1963, 1975 and proposed 2015 Seminoe Pipelines Easement Location Exhibits

Aerial Dated October 2013; Taken From Google Earth

REV.	DATE	BY	DESCRIPTION

Terracon
Consulting Engineers and Scientists
2110 Overland Avenue, Suite 124 — Billings, MT 59102
PH. (406) 656-3072 — FAX. (406) 656-3578

Yellowstone River Seminoe 2.2 - Easement Location Detail
Station 124+12 / AM 2.2
Phillips 66 Pipeline LLC
Seminoe 8" Pipe Line
Yellowstone County — Montana

4

DESIGNED BY:	DNebel
DRAWN BY:	CWright
APPVD. BY:	GRome
SCALE:	As Shown
DATE:	Mar 2015
JOB NO.	AJ157000
FILE NAME:	2.2 Easement.dwg
SHEET NO.:	4 OF 4