Bridger Pipeline Expansion

General Project Overview

Submitted to:

Montana Department of Environmental Quality

Submitted by:

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1.0 INTRODUCTION

Bridger Pipeline Expansion, LLC, a wholly owned subsidiary of Bridger Pipeline, LLC (collectively, "Bridger") is planning the development and operation of the "Bridger Pipeline Expansion" project, a 36-inch crude oil transmission pipeline, hereafter referred to as "the Project". The purpose of the Project is to transport crude oil from production areas in Canada to existing infrastructure and downstream markets in the United States. The Project will expedite the construction and operation of critical energy infrastructure to address significant and growing demand for the safe, efficient, and reliable transportation of crude oil resources from production areas in Canada to existing infrastructure in Guernsey, Wyoming and other downstream markets.

The Project reflects a significant and meaningful investment in the U.S. energy economy, while creating high-paying jobs during construction and operation, and benefiting all landowners, public and private. Executive Order 14156 "Declaring a National Energy Emergency," January 20, 2025 directs federal agencies to expedite the identification, siting, production, transportation, and generation of domestic energy resources, including crude oil, on federal lands and elsewhere, to ensure national energy security and economic stability, specifically Sec. 3, Expediting the Delivery of Energy Infrastructure.

The Project will require a Certificate of Compliance under Montana's Major Facility Siting Act (MFSA), and a Presidential Permit to authorize construction and operation of facilities crossing the U.S./Canada border. Additionally, the Project crosses lands managed by the Bureau of Land Management (BLM) and U.S. Forest Service (USFS); therefore, Bridger will be required to complete an Environmental Impact Statement (EIS) to comply with both the Montana Environmental Policy Act (MEPA), and the National Environmental Policy Act (NEPA).

For the MFSA, MEPA and NEPA environmental review processes, Bridger will design and engineer the Project, conduct all required field surveys, prepare the associated technical reports, and compile supporting data. Based on this information, Bridger will submit a complete MFSA Application to the Montana Department of Environmental Quality (DEQ), and a SF 299 and Plan of Development to the Bureau of Land Management (BLM). DEQ and BLM will be responsible for soliciting and contracting a consultant for the NEPA and MEPA review, which includes preparation of the required environmental documentation. All permits required for construction and operation of the Project, beyond MEPA and NEPA approvals, will be the responsibility of Bridger.

Bridger's technical information and mapping, which will be formally submitted to DEQ in March, will provide substantive information on a range of reasonable alternatives, anticipated beneficial and adverse environmental impacts, and mitigation measures which will provide the basis for the MEPA/NEPA analyses.

2.0 PROJECT DESCRIPTION

Bridger is proposing to construct a 36-inch diameter steel crude oil pipeline engineered to deliver a nominal capacity of approximately 550,000 barrels per day (bpd) of crude oil.

The Project will begin near the U.S./Canada border in Phillips County, Montana, and extend approximately 645 miles to the south, terminating at an existing facility near Guernsey, Wyoming. Approximately 435 miles occur in Montana across Philips, Valley, Daniels, Sheridan, Roosevelt, Richland, Wibaux, Fallon and Carter counties, with the remaining approximately 210 miles occurring in Wyoming across Crook, Weston, Niobrara, Goshen and Platte counties. (See Figure 1)

In addition to the project right-of-way (ROW), Bridger requires several key facilities along the route, including mainline valves, pump stations, temporary pipe yards, staging areas, materials storage areas, electrical power and access roads. The locations and layouts of these facilities will be established as project planning advances and will consider proximity to construction spreads, access to existing infrastructure, minimization of environmental and cultural impacts, and compliance with local, state, federal, and Tribal regulations.

2.1 Right-of-Way

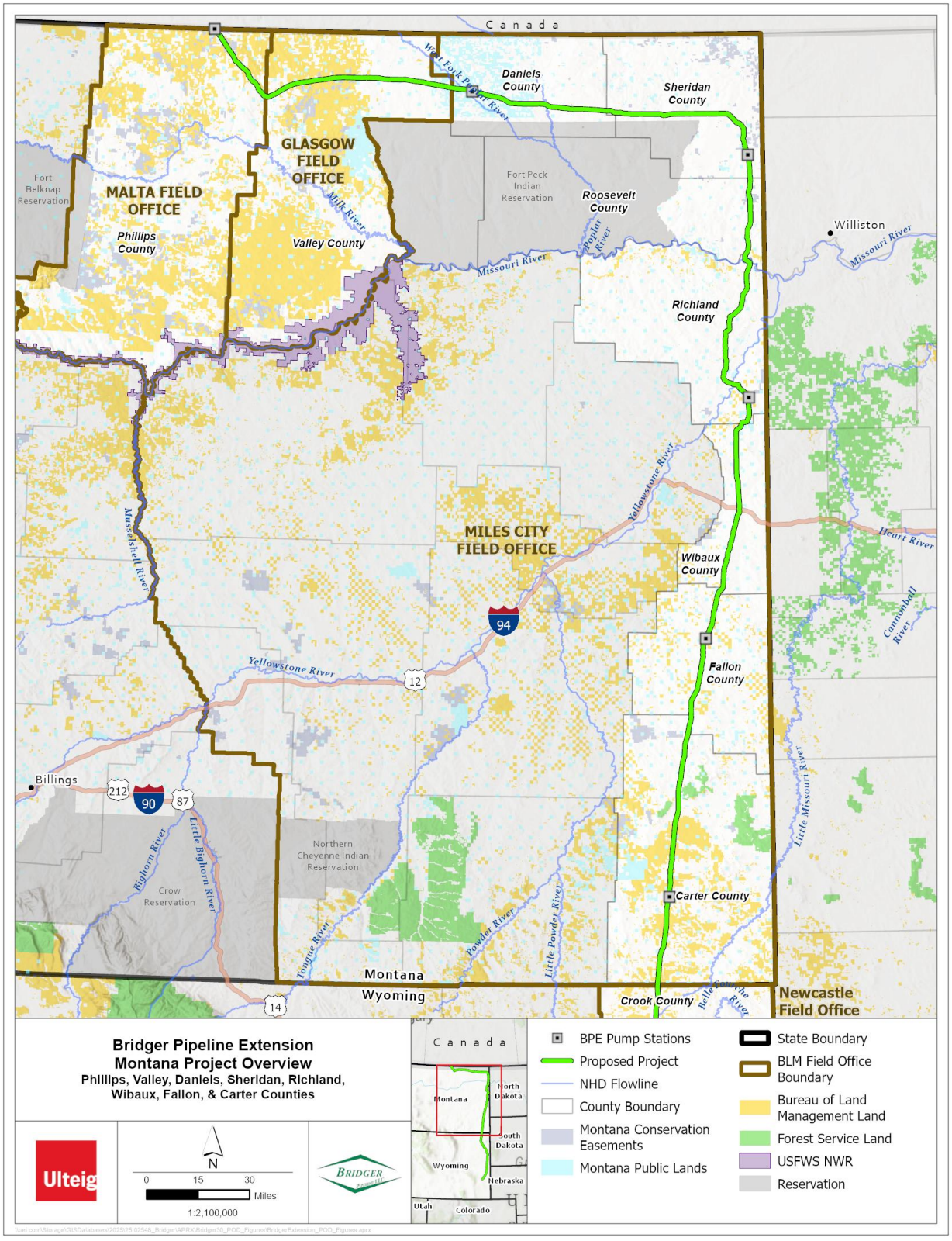
To facilitate construction and future maintenance, the Project will establish a 50-foot-wide permanent ROW and 100-foot-wide temporary easement across private, state and federal lands (the configuration on federal lands may vary). The ROW and construction easement corridors create a total construction corridor width of 150 feet, ensuring adequate space for safe and efficient staging, storage and crew operations during construction, and long-term maintenance of the pipeline and related facilities.

To minimize new disturbance, the Project was developed to align with existing pipeline ROW or easements wherever practicable, paralleling segments of Bridger's and various other pipelines. In Montana, approximately 230 miles of the route, and the entire 210 miles in Wyoming parallels existing pipeline infrastructure. Of that total distance, approximately 354 miles of the route parallels Bridger owned/operated infrastructure. The distance between the proposed alignment and existing infrastructure varies by location and reflects engineering requirements, land ownership boundaries, safety considerations, and avoidance of sensitive environmental, cultural, or Tribally identified resources.

Additional ROW may be required for permanent access roads, proposed pump stations and associated electrical transmission lines, and staging areas for roadway and waterbody crossings. Most construction activities would remain within the 50-foot permanent ROW and 100-foot temporary construction easements; however, additional temporary workspaces (ATWS) would be required for items such as laydown yards, staging areas, temporary access roads, horizontal directional drilling (HDD), and rugged terrain.

Figure 1

Project Location Map



In locations where sensitive environmental or cultural resources, or Tribally identified resources, significant topographical features, or regulatory constraints are present—such as near rivers, wetlands, protected habitats, or cultural sites—the configuration and/or width of the construction corridor may be modified or reduced to minimize disturbance and comply with agency and Tribal requirements. Where feasible, and safe, temporary narrowing of the construction corridor to a minimum width of approximately 75 feet may be implemented for short segments of up to 500 feet, with such narrowing repeated as needed, provided it can be performed safely and in coordination with the applicable land-managing agency.

Placement of the pipeline within the permanent ROW and the configuration of the construction corridor may be adjusted based on site-specific conditions such as terrain, existing infrastructure, landowner preferences, and the presence of environmentally sensitive areas. For construction staging at road or water crossings, or in areas requiring additional workspace, ATWS will be obtained as needed and restored following construction in accordance with applicable permit conditions.

2.2 Pipeline Facility

The Project design and construction will be carried out in accordance with the U.S. Department of Transportation (USDOT) standards, with emphasis on 49 CFR Part 195 for hazardous liquids and 49 CFR Part 194 for onshore oil pipeline response plans. These regulations discuss a range of requirements and standards including general safety, incident reporting, design and construction, pressure testing, operational controls, personnel qualifications, and corrosion prevention. Other relevant standards considered by the Project are those outlined by American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), and American Society for Testing and Materials (ASTM).

The Project is designed to minimize undesirable environmental and socioeconomical impacts while meeting energy supply demands, and is designed, constructed, and operated in accordance with 40 CFR Part 112 for oil spill prevention, 49 CFR Part 195 for hazardous liquids, and 49 CFR Part 194 for onshore oil pipeline response plans.

Line pipe and bore pipe will have an outside diameter of 36 inches and be composed of high-strength steel with applied protective fusion bonded epoxy (FBE) coating(s). Key design parameters are summarized in

***Table 1: Project* Design Parameters**. Typical operations will range from 60°F and 150 to 1,375 pounds per square inch gauge (psig).

Table 1: Project Design Parameters

Parameter	Value
Pipe Specifications	Line Pipe: 36-inch outside diameter high-strength steel (API 5L X70 PSL-2) HDD/Bore Pipe: 36-inch outside diameter high-strength steel (API 5L X70 PSL-2)
Coating	Line Pipe: 14-16 Mils Fusion Bonded Epoxy (FBE) coating HDD/Bore Pipe: 14-16 Mils FBE coating and 30 Mils Abrasion Resistant Overcoating
Maximum Operating Pressure and Temperature	1,440 psig / 250°F
Depth of Cover	Typically 48 inches of cover
Pipe Wall Thickness	Line Pipe: 0.500-inch wall thickness HDD/Bore Pipe: 0.625 – 0.750-inch wall thickness
Mainline Valves	MLV would be installed along the route, spaced approximately 20 miles apart and on both sides of rivers and major waterways
Pump Stations	Eight pump stations would be installed.
Leak Prevention Program	Multiple overlapping and redundant systems, including: • Epoxy pipe coating • Cathodic protection • One-Call Damage Prevention Program • SCADA monitoring • InLine inspection (smart pigs) • Periodic ROW patrols
Telemetry for remote Monitoring and Control	Telemetry and communications equipment will be installed to allow for 24/7/365 monitoring and control of the pipeline via SCADA network.

2.3 Pumps and Valves

Bridger plans to install eight pump stations along the pipeline route between the U.S./Canada border in Phillips County, Montana, and the existing terminal facility near Guernsey, Wyoming. One pump station will be located on federal lands near the U.S./Canada border. In addition, the Project will include 72 mainline valve sets (MLVs), all of which will be situated within the permanent ROW. Six MLVs are proposed on federal lands (five in Montana and one in Wyoming), and 66 MLVs are proposed on non-federal lands. Valve sites will occupy approximately 40-foot by 200-foot areas within the permanent ROW and will be situated atop gravel pads, enclosed by a perimeter fence to ensure security and regulatory compliance.

MLVs will be spaced at a maximum interval of approximately 15 miles and positioned on both sides of major water crossings to ensure operational safety and environmental protection. Pump stations and valve sets are essential for maintaining optimal pressure and flow rates throughout the transmission system—ensuring

the safe and efficient movement of crude oil over long distances. The precise locations of these facilities will be determined based on hydraulic modeling, operational and regulatory requirements, and environmental considerations, with final siting subject to regulatory review and landowner coordination.

2.4 Access Roads

The Project will utilize existing roads, pipeline ROW's and two-track trails to minimize new ground disturbance whenever feasible. Construction of concrete/asphalt roads is not anticipated; however, permanent improved access roads may be required to reach project facilities.

Permanent roads would be surfaced with gravel, sourced from approved commercial locations, to provide durable and reliable access while reducing environmental impact. Bridger will maintain the permanent access road through routine grading to ensure a stable and safe driving surface, and will provide snow removal as needed to allow for year-round access and reliable operations.

Temporary access roads connecting construction areas are anticipated to have a 24-foot running surface, with a total ground disturbance width of approximately 30 feet.

2.5 Temporary Extra Workspace and Staging Areas

During construction, the Project will require ATWS and staging areas. Locations and areas have not been finalized, however ATWS is necessary at HDD, or bore locations, to accommodate specialized equipment and construction activities, and staging areas will be required to be strategically placed along the route. Where possible, the pipeline ROW will be used, but additional space may be needed depending on alignment and direction of the approach to the bore site. For example, wetland and waterbody crossings, completed by HDD or bore, will require ATWS measuring approximately 250 feet by 150 feet at the entry point and 150 feet by 150 feet at the exit points in addition to HDD pipe string staging, if not parallel to the ROW.

Beyond HDD sites, ATWS may also be needed for equipment laydown areas. (Locations where topographical or environmental constraints limit standard workspace, road or utility crossings, and for the safe maneuvering of construction vehicles and materials.) These areas are essential for efficient and safe construction operations and minimizing impacts to surrounding land/resources. While these additional areas may be necessary, the frequency and extent of ATWS would be minimized while on federal lands. Refer to ***Table 1: Typical ATWS.***

Pump stations, staging areas, access roads and ancillary facilities will be sited and designed to avoid or minimize impacts to environmental, cultural, and Tribally identified resources and may be subject to redesign, relocation, or additional mitigation measures as necessary.

Table 1: Typical ATWS

Feature	Size	
	Typical Dimensions (Feet)	Acres
HDD: Waterbodies	HDD entrance 250 x 150, HDD exit 150 x 150.	1.4
HDD: U.S./State Highway and Railroads	175 x 25 on working and spoil sides or 150 x 50 on working side only	0.2
HDD: Private, Township, or County Roads	125 x 25 on working and spoil sides or 125 x 50 on working side only	0.1
HDD: Buried Utilities	125 x 50	0.1
HDD: Pipe String Staging	TBD	TBD
Mobilization and Demobilization Areas	470 x 470	5.1
Vehicle Turnaround Areas	200 x 80	0.4
Temporary Access Roads	30-foot-wide; variable length	Variable based on length

2.6 Electrical Power Lines

Bridger anticipates that certain utility line work will be required for the Project. Bridger will be responsible for identifying locations where electrical power is needed for the operation of the project, but would not be responsible for permitting or constructing power lines required for the project; such responsibilities would fall to the appropriate utility providers. Utility providers would pursue any needed state or federal approvals.

2.7 Construction Activities

Construction activities for the Project will commence once all required permits, authorizations, and approvals are secured. This is anticipated to occur in July 2027. Bridger anticipates construction crews will complete roughly 20 miles of pipeline per month, which is the benchmark used for project scheduling. Major activities will include:

- Site Preparation: The contractor will mobilize equipment and staff to the site and conduct clearing, grading, pipe stringing, and trenching activities. Typical timeline for this task is approximately five miles per week. Equipment on site will generally include: dozers, backhoes, and graders to complete the clearing and grading process.
- Pipeline Assembly: After the pipe stringing has been completed, production welding and non-destructive testing (NDT) will occur. Typical timeline for this task is approximately five miles per week.

- Trenching: To meet regulatory requirements the trench is typically excavated to a depth that ensures a minimum of 48 inches of cover above the pipe. All work in/around the trench is performed in accordance with OSHA, state, and company safety standards. To minimize open-trench exposure, a limited section is left open ahead of backfilling—with the duration determined by safety considerations, weather, permit conditions, and landowner input. In active grazing areas, open trenches are fenced off, and temporary crossings or bridges are provided for livestock as needed (or alternative solutions are coordinated with landowners). Trench construction for pipeline installation would involve the use of trenching machines, bulldozers and track hoes.
- Installation and Backfill: Installation and back fill include lowering the pipeline into the trench, pipeline tie-ins, and backfilling. After welding, coating, and inspecting the pipeline sections, side booms are used to carefully lower the pipe into the prepared trench. To protect the pipeline coating, flexible, non-metallic slings are utilized during placement, and bedding material may be added to the trench base as needed. Any water found in the trench is pumped out. Discharge is filtered (through hay, straw bales, or silt bags) before being returned to the soil. If there is suspicion that the water contains contaminants, it is removed from the site and disposed of at an approved facility.

  Once the pipeline is securely placed in the trench, the excavation is refilled using the native soil, if appropriate, that was originally removed. First, the subsoil is returned and compacted, followed by the topsoil. This method ensures proper support and compaction around the pipeline—helping to protect its coating and maintain long-term stability.

  Typical timeline for this task is approximately five miles per week; however, trenching activities will only occur after the pipeline has been welded. Equipment on site will generally include: backhoes, dozers, string trucks, bending machines, side booms, welding machines, welding shacks, and testing units will be required to complete stringing, bending, and welding operations.
- Testing and Reclamation: Testing and reclamation includes hydrostatic testing, reseeding temporarily disturbed areas, and final ROW cleanup. Final reclamation may be impacted by seasonal weather changes. The timeline is assuming there are no weather delays. Typical timeline for this task is approximately five miles per week.
- Demobilization: Upon completion of the project, the contractor removes all equipment and demobilizes from the Project. Typical timeline for this task is approximately four work weeks.

3.0 ROUTING ALTERNATIVES

Major route alternatives have been reviewed as part of Bridger's route selection process. Given the existing pipeline infrastructure in Canada and along the eastern border of Montana from approximately Sidney, Montana, south to a major hub at Baker, Montana, and south to Guernsey, Wyoming; the efficiency of a direct

route from Canadian infrastructure corridor to U.S. (Montana) infrastructure corridor was the initial guide for forming the following major alternatives:

- Option 1) The proposed route traverses from the location of anticipated U.S. border crossing, near existing and future Canadian infrastructure, by heading south (around known sensitive areas) for 25 miles. After, head easterly direction to the most northern pipeline/infrastructure near MT Highway 5 and MT Highway 16. Then route south to Guernsey, Wyoming following existing pipelines, infrastructure, and transmission pipelines.

- Option 2) Traverse from the location of anticipated U.S. border crossing, near existing and future Canadian infrastructure, in the shortest path at a south/southeasterly direction to the major pipeline infrastructure near Baker, Montana. After, route south to Guernsey, Wyoming following existing transmission pipelines.

- Option 3) Traverse from the location of anticipated U.S. border crossing, near existing and future Canadian infrastructure, in the shortest path at a south/southeasterly direction—to the most northern major pipeline infrastructure just north of Sidney, Montana. Then, route south to Guernsey, Wyoming following existing transmission pipelines.

Options 2 and 3 were evaluated during the route selection process but determined to be less feasible than Option 1 due to environmental, cultural, and constructability constraints.

- Option 2 would require crossing multiple on-Reservation and off-Reservation Tribal Trust lands, which would introduce significant permitting challenges and potential delays. This route also intersects USFWS National Wildlife Refuges and designated critical habitat for species such as the northern long-eared bat and greater sage-grouse. Constructability concerns include rugged terrain in southeastern Montana and limited existing access roads, which would necessitate extensive temporary road construction and increase costs and disturbance.

- Option 3 similarly encounters sensitive areas, including large blocks of Tribal Trust lands near Sidney, Montana, and wetlands associated with the Yellowstone River corridor. This alternative would also require multiple major waterbody crossings, including the Yellowstone and Powder Rivers, increasing engineering complexity and environmental risk. From a constructability standpoint, Option 3 would involve routing through areas with steep slopes and unstable soils, requiring additional grading and erosion control measures.

Both alternatives result in additional regulatory requirements and land-use conflicts, higher construction costs, longer timelines, and greater environmental impacts. These factors led to the conclusion that Options 2 and 3 are not practicable.

The proposed Project is pursuing Option 1 to avoid significant sensitive and constrained areas. These include: on-and-off Reservation Tribal Trust lands, USFWS National Wildlife Refuges, and other key land-use restrictions. Option 1 allows Briger to avoid environmentally significant areas. In addition to consideration of major route alternatives, the proposed route will continue to make smaller, more minor adjustments to further refine the alignment with the same objectives in mind to reduce potential impacts on resources.

4.0 POTENTIAL IMPACTS AND MITIGATION

Environmental resources potentially affected by the Project include landforms, surface water and groundwater resources, air quality, native vegetation, wildlife and associated habitats, and paleontological, cultural, and historical resources. In general terms, Bridger intends to balance construction efficiency with environmental stewardship and regulatory compliance.

Construction of the Project will involve the movement of a substantial amount of manpower, materials and equipment and will result in extensive surface disturbance. Bridger anticipates avoiding sensitive resources to the extent feasible through routing around those resources or utilizing horizontal directional drilling to avoid impacts. Impacts from surface disturbance can be minimized with proactive segregation of topsoil, and timely recontouring and reseeding after construction is complete. With the implementation of avoidance, minimization and mitigation measures, the impacts from the Project are anticipated to be isolated and short term.

Bridger will complete calculations and assessments of impacts for the MFSA Application and POD, and will prepare a Construction, Mitigation, and Reclamation Plan (CMRP) detailing measures for avoiding, minimizing, and mitigating construction-related impacts.