



6905 S. 1300 E. #288, Cottonwood Heights, UT 84047-1817

FUELING UTAH'S GROWTH & PROSPERITY

February 8, 2021

Joshua Wayland, PhD
Surface Transportation Board
c/o ICF
9300 Lee Highway
Fairfax, VA 22031

Attn: Environmental filing, **Docket NO. FD 36284**

Dear Mr. Wayland,

The Utah Petroleum Association (UPA) supports the proposed Uinta Basin Railway project and the draft environmental impact statement (EIS) completed by the Surface Transportation Board (STB). The railway is a vital infrastructure asset for the economy of the Uinta Basin, which is heavily focused on oil and natural gas development and will be a critical catalyst for new production by creating better access to world markets. The railway would be a vital stimulant to economic opportunity and job creation for the four counties in the basin and the Ute Indian Tribe, and the project has successfully mitigated environmental impacts. As such, STB should finalize the EIS in an expeditious manner.

UPA is a statewide oil and gas trade association established in 1958 representing companies involved in all aspects of Utah's oil and gas industry. UPA members range from independent producers, to midstream and service providers, to major oil and natural gas companies widely recognized as industry leaders. UPA represents Utah's oil and gas workers, and celebrates their role in delivering safe, clean and local energy that drives Utahns and our way of life.

Upon review of the draft EIS we for the most part concur with the analysis of environmental impacts that the proposed railway would result in, believe the STB has met all currently applicable laws and regulations in their review of the project, and demonstrated that resulting project impacts can be appropriately addressed through mitigation measures. One exception is the STB statement that "The Coalition shall

also follow the guidelines for avoiding and minimizing impacts set out in the Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances for the protection of bald and golden eagles, as applicable.” Please note that the referenced guidelines are no longer FWS policy.

We are also pleased to see the positive socioeconomic impacts noted for the project area. We would however, like to take this opportunity to point out that while estimating some of the additional positive socioeconomic impacts in terms of new industries or projects that may locate in the area due to the railway may indeed have required speculation, which the STB desired to avoid, the project would certainly lead to new markets and therefore increased production of Uintah Basin produced oil and gas. UPA believes that the Salt Lake Refining market will remain the market of choice for basin crude due to proximity and resulting transport cost drivers. This will result in new incremental production of basin crude for transport via the new rail project, which brings direct jobs and economic benefits, indirect and induced economic growth and new tax revenue and royalties to the communities and the Ute Indian Tribe. The model for transporting Uintah Basin crude via rail to gulf coast markets has already been proven and is ongoing today, albeit at smaller scales. As such, we believe greater consideration of these benefits in the socioeconomic impacts analysis would have been appropriate.

Given that the analysis has demonstrated that project impacts are fully manageable while also demonstrating the significant benefits this project is anticipated to have on the surrounding communities and Ute Indian Tribe, we support timely completion of the project review process. Thank you for the consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rikki Hrenko-Browning". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Rikki Hrenko-Browning
President
Utah Petroleum Association