

MEMO

TO: Federal Energy Regulatory Commission

FROM: Dave Woods, Senior Project Engineer

DATE: August 10, 2006

RE: Section 7 Endangered Species Act Consultation – Stewart Branchline Extension - BT Project No: 555

Big Tree Oil Company operates natural gas pipelines in Iowa by authority of the Federal Energy Regulatory Commission (FERC) and is in the process of completing a NEPA Checklist for the Stewart Branchline Extension Project (BT Project Number: 555) in Decatur County, Iowa (T69N, R25W, Section 26).

The Stewart Branchline Extension consists of construction of 800 additional feet of 10-inch pipe. The project footprint includes an area approximately 10 feet by 800 feet with an additional 100-foot by 200-foot temporary workspace. Project construction is scheduled in October or November, 2006.

Big Tree carefully reviewed the U.S. Fish and Wildlife technical assistance website on June 30, 2006, for federally listed threatened and endangered species. According to the website, 4 species are listed and may be present in Decatur County: the Indiana bat, eastern prairie fringed orchid, and Mead's milkweed are listed as occurring in Decatur County, the bald eagle is listed as potentially occurring in any Iowa county, and the prairie bush clover and western prairie fringed orchid are listed as potentially occurring in any Iowa counties containing dry, mesic, or wet prairies.

The action area for the proposed project is made up almost entirely of agricultural row crop, however approximately 25 feet will bisect the southeast corner of the 100-acre Pretty Prairie.

On July 15, 2006 a survey for potential habitat for above species was performed within Pretty Prairie by consulting botanist, Joy O. Nature. Three individual Mead's milkweed plants were found within 50 feet of the pipeline alignment. No other listed plant species were found. No trees were found within the project area which would provide potential habitat for the Indiana bat or bald eagle.

To avoid any direct or indirect effects to the Mead's milkweed in Pretty Prairie, Big Tree will install the pipeline at least 6 feet deep under the prairie extending 50 feet on both sides using directional drilling. Big Tree has concluded that by using these drilling techniques the Mead's milkweed will not be exposed to project.

For these reasons, we conclude the Stewart Branchline Extension Project will have "no effect" on listed species, their habitats, or proposed or designated critical habitat.