POWDER RIVER ENERGY CORPORATION

221 MAIN STREET
P.O. BOX 930
SUNDANCE, WY 82729-0930
FAX: (307) 283-3527

200 GARNER LAKE ROAD
GILLETTE, WY 82718-0937
FAX: (307) 682-0733

1095 BRUNDAGE LANE
SHERIDAN, WY 82801-1387
FAX: (307) 674-9018

1-800-442-3630

June 11, 2019

Mr. Chris Petrie
Chief Counsel
Wyoming Public Service Commission
Hansen Building, Suite 300
2515 Warren Avenue
Cheyenne, WY 82002

Re: Docket No. 10014-200-CA-19
Application for Certificate of Public Convenience and Necessity

Dear Mr. Petrie:

Please find enclosed one (1) original and four (4) copies of Powder River Energy Corporation's Application and supporting documentation requesting a Certificate of Public Convenience and Necessity to site, design, construct/rebuild, operate and maintain a new 69 KV high voltage distribution power line. Also enclosed is check #262044 in the amount of $5.00 for the filing fee.

Powder River Energy Corporation respectfully requests approval of this Application from the Commission.

Sincerely,

Michael E. Easley
Chief Executive Officer

MEE/sjp

Enclosures

BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF POWDER RIVER ENERGY CORPORATION, SUNDANCE, WYOMING, FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO SITE, DESIGN, CONSTRUCT / REBUILD, OPERATE AND MAINTAIN A NEW 69 KV HIGH VOLTAGE DISTRIBUTION POWER LINE THAT WILL BE AN ADDITION TO OUR FACILITIES IN CAMPBELL COUNTY, WYOMING (PRECORP WO NO. 180333 – PEABODY 69KV LINE REROUTE).	)	DOCKET NO. 10014-200-CA-19

APPLICATION

Powder River Energy Corporation ("PRECorp" or "Applicant" herein), a Wyoming corporation whose address is Post Office Box 930, Sundance, Wyoming 82729, hereby respectfully requests an order from the Wyoming Public Service Commission ("Commission") permitting the Applicant to construct the project described below. PRECorp requests said Order be effective on or before July 31, 2019.

In support, the Applicant sets forth the following facts and circumstances justifying the granting of the Application:

1. PRECorp is a non-profit cooperative utility organized, existing under and by virtue of the laws of the State of Wyoming.
2. PRECorp is duly authorized to generate, manufacture, purchase, acquire, and transmit electric energy, sell supplies and dispose of electric energy in its certificated territory.
3. The rates charged by PRECorp for its electric service have been established and placed in effect under appropriate Orders of the Commission.

4. PRECorp represents it is a member of Member 1st Power Cooperative and a Class C member of Basin Electric Power Cooperative ("Basin"), Bismarck, North Dakota, and therefore purchases all of its' power requirements through agreements and contracts with Member 1st Power Cooperative, and Member 1st Power Cooperative purchases all of its' power requirements through agreements and contracts with Basin.
5. Mark L. Hughes of 113 North 3rd Street, Sundance, Wyoming 82729 is the General Counsel for PRECorp.
6. Communications regarding this Application are to be addressed to Michael E. Easley, Chief Executive Officer for the Applicant, Post Office Box 930, Sundance, Wyoming 82729, or Mark L. Hughes, General Counsel for the Applicant, Post Office Box 456, Sundance, Wyoming 82729.
7. In further support of this Application, PRECorp submits the following information required under Commission Rule Chapter 3, Section 21(c)(i) thorough (ii).

I. APPLICATION INFORMATION PURSUANT TO SECTION 21 (c)(i)

(A) *Name and Address of the applicant:*

Powder River Energy Corporation

Michael E. Easley, CEO

Post Office Box 930

Sundance, Wyoming 82729

(B) *The type of plant, property or facility proposed to be constructed or acquired:*

The purpose of the Peabody 69kV Line Reroute (hereafter referred to as the Peabody Line Reroute) project is to reroute approximately 3.1 miles of existing 69 kV power line with 4.8 miles of a 556 Aluminum-Conductor Steel-Reinforced cable (ACSR) conductor in a similar H-frame two-pole configuration. This will result in a net increase of power line in this area of 1.7 miles. The rerouted power line will be constructed to current internal standards and guidelines and is anticipated to begin in August 2019 and completed by the end of the year.

(C) *A description of the facilities proposed to be constructed or acquired, including preliminary engineering specifications in sufficient detail to properly describe the principal systems and components, and final and complete engineering specifications when they become available:*

The Peabody Line Reroute project includes the reroute of approximately 3.1 miles of existing power line with 4.8 miles of 556 ACSR conductor supported on H-frame structures. There will be forty structures in all. The basic structure design will be TH-1AAX-VO. See **Exhibit 1** for the TH-1AAX-VO design specification for the configuration of the H-frame structure.

The reroute of this project will allow Peabody Mining to recover minerals under the existing power line. See **Exhibit 2** for a Vicinity Map that illustrates the route and location of existing and new 69kV HVD power lines.

(D) *The rates, if any, proposed to be charged for the service that will be rendered because of the proposed construction or acquisition:*

This line rebuild is designed to support all rate classes in the southeast Campbell County area.

(E) *The estimated total cost of the proposed construction or acquisition:*

The estimated total cost of the proposed project is $1,877,825. The estimate includes the labor materials, and overhead costs to construct 4.8 miles of new 69kV line and the retirement of 3.1 miles of 69kV line. See **Exhibit 3** for cost details in the Engineers Estimate.

(F) *The manner by which the proposed construction or acquisition will be financed:*

The proposed project will be financed by Contribution In Aid of Construction (CIAC) from Peabody Mining.

(G) *Documentation of the financial condition of the applicant:*

Attached as **Exhibit 4** is PRECorp's RUS Form 7 2018 Annual Report.

(H) *The estimated annual operating revenues and expenses that are expected to accrue from the proposed construction or acquisition, including a comparison of the overall effect on the applicant's revenues and expenses:*

As a result of this project, it is anticipated that related revenues and expenses will not change.

(I) *Blank because there is not an "I" category listed in the Wyoming Public Service Commission Procedures.*

(J) *The estimated start and completion date of the proposed construction or date of acquisition:*

Construction is planned for August 2019 through December 2019.

II. ADDITIONAL MAJOR UTILITY FACILITY INFORMATION (Section 21 (c)(ii)

(A) *A description of the proposed site, including the county or counties in which the facility will be located, with a Metes and Bounds description, and a description of the terrain where the facility will be constructed:*

A tract of land located in the Sections 14, 15, 22, 27, 28 and 33 of Township 42 North, Range 71 West; Sections 03 and 04 of Township 41 North, Range 71 West, 6th P.M. Campbell County, State of Wyoming.

Course 1: Commencing a the Southwest corner of Section 14, T .42N, R.71W; Thence North 24°12’53” East, a distance of 1389.57 feet to the Point of Beginning. Thence South 02°44’48” West, a distance of 625.54 feet; Thence North 87°21’14” West, a distance of 993.24 feet; Thence South 02°52’46” West, a distance of 4196.53 feet; Thence South 08°51’22” East, a distance of 716.34 feet; Thence South 05°50’51” West, a distance of 1519.72 feet; Thence South 42°11’20” West, a distance of 7195.05 feet; Thence South 01°24’06” East, a distance of 5437.48 feet; Thence North 88°59’29” East, a distance of 3240.08 feet; Thence South 37°55’25” East, a distance of 711.44 feet; Thence North 88°20’26” East, a distance of 1227.83 feet; Thence South 08°21’29” East, a distance of 49.66 feet to a Point of Terminus, said point being located South 37°46’37” West, a distance of 1406.31 feet from the Northeast corner of Section 03, T.41N., R.71W.

Course 2: Commencing at the Northeast corner of Section 03, T.41N, R.71W; Thence South 01°46’54” West, a distance of 1053.97 feet to the Point of Beginning. Thence North 01°07’55” West, a distance of 730.63 feet; Thence

North 61°32’39” West, a distance of 226.41 feet; Thence North 83°38’42” West, a distance of 232.72 feet to a Point of Terminus (Teckla Sub), said point being located South 68°22’25” West, a distance of 513.71 feet from the Northeast corner of Section 03, T.41N, R.71W .

Course 3: Commencing at the Northeast corner of Section 03, T .41N, R.71W; Thence South 69°18’57” West, a distance of 441.67 feet to the Point of Beginning (Teckla Sub). Thence North 89°56’55” East a distance of 145.20 feet; Thence North 01°21’03” West, a distance of 254.68 feet to a Point of Terminus (Porcupine Sub), said point being located North 70°11’02” West, a distance of 291.25 feet from the Southeast corner of Section 34, T.42N, R.71W.

*Bearings and Distances are based upon NAD83 (2011) Wyoming State Plane, East Central Zone, US Feet.

The proposed project located in Campbell County is approximately 12-miles Southeast of Wright Wyoming. The terrain of the project area is primarily comprised of gently rolling hills with areas of ridgelines that are characterized by steeper terrain and deeply cut draws. Elevations in the area range from 4,700 feet to 4,900 feet above sea level. Refer to **Exhibit 5** for the Project Plan and Profiles Drawings.

(B) *A geological report of the proposed site, including foundation conditions, groundwater conditions, operating mineral deposits within a one-mile radius and a topographical map showing the area within a five-mile radius:*

It is anticipated that a Geological Report will not be necessary for this project, as this project is similar in nature to the existing infrastructure.

(C) *A description of the plans for protecting the surrounding scenic, historical, archeological and recreational locations; natural resources; plant and animal life; and land reclamation, including:*

Scenic – No designated scenic resources are located within the proposed line corridor.

Historical and Archeological – The right-of-way corridor lies on State lands, Federal lands and privately-owned lands. Antiquus Cultural Resource Consulting conducted a Class III Inventory on the lands we could obtain permission to access. Based on the three previous inventories and the results of this Class III Inventory conducted, the potential for containing significant cultural properties in this area is considered low. More details regarding the historical and archeological finds can be found in the Cultural Resources Inventory Report and Map attached as **Exhibit 6**.

Recreational Locations – No designated recreational areas are located near the proposed project area.

Natural Resources – Current land uses within the project area include livestock grazing, hay production, and industry development. Industry development includes oil drilling, electrical substations and coal mines. One county and several private access roads, as well as existing overhead power lines and a three-rail train corridor transect the survey area.

Plant and Animal Life – The 69kV reroute survey area is comprised on mixed habitats with approximately sixty-eight percent (68%) sagebrush, twenty-eight percent (28%) grassland, two percent (2%) disturbance, one percent (1%)

wetlands, and less than one percent (<1%) other (e.g. introduced upland vegetation [shrubs] and riparian). The area is dominated by shrub lands and upland grasslands. There are six black-tailed prairie dog colonies within the wildlife survey area. The colonies comprised approximately thirty-three (33) acres of active and occupied lands. Several avian and mammal species use these lands regularly. The private landowner to the West uses his property as grazing pasture for livestock (sheep and cattle). More detail can be found in the Clearance Survey for Threatened and Endangered Species, and Other Wildlife Species of Concern attached as **Exhibit 7**.

Activities associated with the construction of proposed project may cause temporary displacement of wildlife. Increased human presence in a localized area, as well as increased noise levels associated with construction activities, may cause some species to avoid or change movement patterns to avoid disturbance. Multiple game and non-game species exist around this area and are addressed in the report submitted to the Wyoming Game and Fish Department (WGFD). This document is attached as **Exhibit 8**, Impacts of Project on WGFD Managed Species Report.

Land Reclamation – Any areas that need to be reseeded after construction is complete, will be reseeded using native grasses and forbs.

(I) A general description of the devices to be installed at the major utility facility to protect air, water, chemical, biological and thermal qualities:

The major utility facilities installed will consist of poles and wire. No air, water or thermal surrounding properties are expected to be impacted. The

poles are treated with pentachlorophenol that is an accepted practice to extend the life of the wood poles. The pentachlorophenol is a heavy hydrocarbon which breaks down over time with exposure to the elements and especially UV radiation. The structure configurations are safe to avian species which is the only biological impact expected.

(II) The designed and tested effectiveness of such devices; and,

The structure configuration meets or exceeds clearance guidelines in the Avian Power Line Interaction Committee's latest publication. PRECorp meets or exceeds RUS' guidelines on constructing 69kV lines.

(III) The operational conditions for which the devices were designed and tested.

PRECorp's design criteria is based on National Electrical Safety Code (NESC) Heavy loading in this area. PRECorp has selected a pole variety, which has demonstrated longevity in this region. The lines are designed using 115kV construction framing and design spacing, which also lends to the longevity of the line.

(D) *A description of any potential safety hazards:*

Once construction is complete, operating electrical infrastructure will exist. Potential safety hazards associated with the installation, maintenance, and operation of High Voltage Distribution Lines includes aviation safety, fire hazards and electric shock.

Aviation Safety – Any potential hazard to area aircraft would relate to the potential for collision in the navigable air space. The proposed line design

meets or exceeds the applicable federal regulations and standards that are intended to ensure the appropriate distances and visibility necessary to prevent such collisions are maintained. There are no known public or private air fields within one mile of the proposed power line.

Fire Hazards – Recognized fire hazards are those that could be caused by sparks from conductors of overhead lines, or that could result from direct contact between the line and nearby trees and other combustible objects. The proposed line is designed to meet or exceed the minimum required separation from vegetation such as trees. PRECorp's maintenance program takes vegetation growth rate into account in determining inspection intervals. Any clearance concerns identified are addressed promptly.

Electrical Shock – Recognized electrical shock could result from direct or indirect contact between an individual and the energized line. Such shocks are capable of serious physiological harm or death. No design-specific federal or state regulations have been established to prevent hazardous shocks from overhead power lines. Safety is assured within the industry from compliance with the requirements in the NESC. These provisions specify the minimum national safe operating clearances applicable in areas where the line might be accessible to the public. They are intended to minimize the potential for direct or indirect contact with the energized line. The proposed line is designed to meet or exceed the requirements specified within the NESC.

The line will be inspected for loose hardware attributed to typical wood shrinkage that can take place within the first year following construction. Any

deficiency noted are corrected at this time. After the first-year inspection, the operation and maintenance of the line is relatively unnoticeable. After the initial line inspection, future inspections and maintenance will be performed by a line crew, in which hardware will be tighten (nuts and bolts) in accordance with PRECorp's maintenance plan. This activity usually lasts roughly ten (10) minutes per pole. Appropriate built-in safety measures and will be followed.

(E) *A description of the real property, fuel and water requirements, including any source of water along which the major utility facility will be constructed or from which it will obtain or return water:*

The project area contains Gray Creek which is a major tributary of the Porcupine Creek drainage. Flowing water was present in Porcupine Creek, but most drainages within the area are mostly dry throughout much of the year and flowing water is intermittent in nature and varies depending on precipitation events throughout the year.

There will be no effect on drainages or wetlands within the project area. The proposed project right-of-way will cross over the Porcupine Creek one time in Section 27; however, construction and maintenance vehicles will access the proposed power line from existing roads outside of all drainages and no vehicular or foot traffic will cross any drainage or areas containing water. At no time does PRECorp discharge dredge or fill material into water.

(F) The acquisition status, source and location of real property, right-of-way, fuel and water requirements:

The right-of-way easements are 100 foot in width (50 feet each side of the centerline of alignment). This project will require four (4) private easements/encroachments which include BTU Western Resources, Bridle Bit Ranch Company, Jerry Dilts Family Limited Partnership I and two sections of BNSF Railway crossings. The project will also include crossing three (3) State of Wyoming sections with power line easements, one (1) Federal United States Forest Services Special Use Permit, and one (1) Campbell County Road Crossing Permit. Easements will all be acquired in Campbell County, Wyoming. All easements and permits have been obtained for the project, with the exception of items for BNSF Railways, State of Wyoming, and Campbell County Road Crossing which all have been applied for. A Landowner Contact List is attached as **Exhibit 9**. The only fuel and water that will be transported on site is for use in the construction equipment. It will be contained in the equipment and not be allowed to be released in the environment.

(G) *The proposed means of transporting fuel and water requirements:*

As indicated in (F), the fuel and water will be for strict use in the vehicles/ equipment and will be contained within the equipment when coming onsite.

(H) *A description of all mineral rights associated with the facility and plans for addressing any split-estate issues:*

PRECorp obtained the necessary authorizations to place our equipment on the surface land. No mineral rights or split-estate issues will need to be addressed.

(J) *A statement setting forth the need for the facility in meeting present and future demands for service in Wyoming or other states:*

PRECorp needs to relocate a segment of our 69kV line to accommodate advancing mining activities in the area.

(K) *A description of the commodity or service the facility will make available:*

This facility will transport electricity for the distribution to our member/owners.

(L) *A statement of the facility's effect on the applicant's and other systems' stability and reliability:*

Relocating a segment of PRECorp's 69kV line away from active mining areas will significantly reduce the potential for system damages caused by normal mining activities.

(M) *The status of satisfying local, state, tribal or federal governmental agency requirements. The applicant shall immediately file all agencies' final orders*:

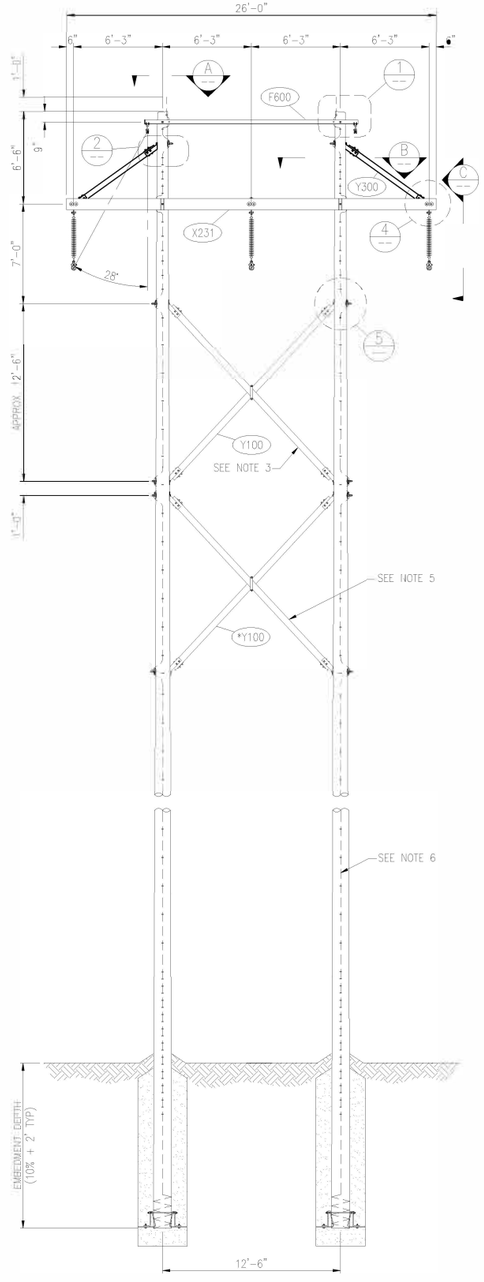
PRECorp authorized wildlife and cultural surveys during the engineering phase of this project. The wildlife reports were submitted to the WGFD in April 2019. A Response from the WGFD dated April 29, 2019 was received from Linda Cope on behalf of Deputy Director Angi Bruce and is attached as **Exhibit 10**.

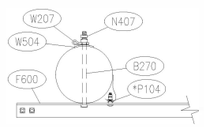
WHEREFORE, Powder River Energy Corporation respectfully requests the Commission make its Order authorizing the Cooperative to construct the proposed project as herein described. The Applicant further requests this permit become effective on or before July 31, 2019.

Dated at Sundance, Wyoming, this 11th day of June, 2019.

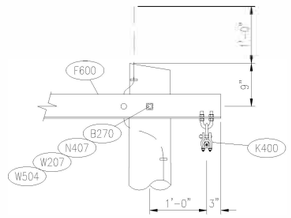
POWDER RIVER ENERGY CORPORATION

Michael E. Easley
Chief Executive Officer





VIEW A
ANGLE ATTACHMENT
SCALE: N.T.S.



DETAIL
SHIELD
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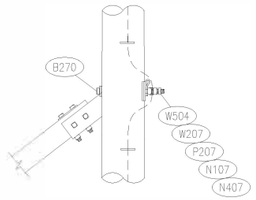

DETAIL 2
VEE BRACE ATTACHMENT
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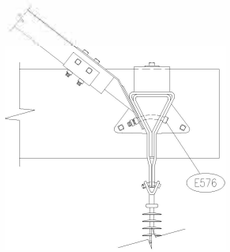

DETAIL 4
ADJUSTABLE SPACER
– END PHASE
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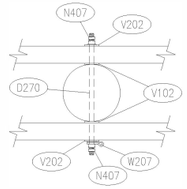

SECTION B
ARM ATTACHMENT
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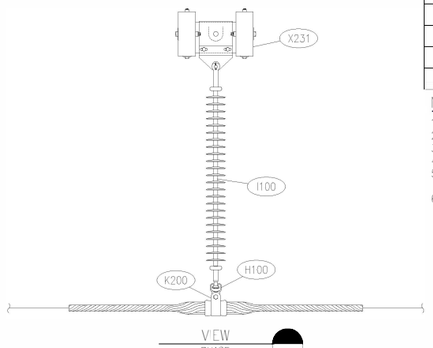
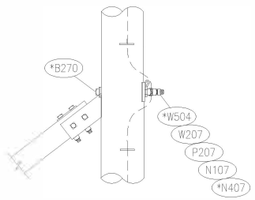


VIEW
PHASE
SCALE: N.T.S.



DETAIL 5
X-BRACE CONNECTION
AND GROUNDING
SCALE: N.T.S.

TH-1AAX-V0 & TH-1AAXX-V0 LIST OF MATERIALS

ITEM	TH-1AAX-V0	TH-1AAXX-V0	DESCRIPTION
B270	4	4	BOLT, MACHINE, 7/8" X REQ'D LENGTH
B270	4*	8*	BOLT, MACHINE, 7/8" X REQ'D LENGTH
D270	2	2	ROD, THREADED, DOUBLE END, 7/8" X REQ'D LENGTH, W/ 2 NUTS
E576	2	2	BOLT, BENT, 7/8" X 6"
F600	1	1	OHGW H-FRAME, SUPPORT ASSEMBLY, 3" X 3 1/2" X 1/4" X 15'-0" LENGTH (12'-6" C/C POLE SPACING)
H100	3	3	SOCKET, EYE, FOR AGS UNIT, AS REQ'D, SEE TM-2
I100	3	3	INSULATOR, SUSPENSION, Y-CLEVIS BALL, SEE TM-2
K200	3	3	AGS SUSPENSION ASSEMBLY, AS REQ'D, SEE TM-2
K400	2	2	CLAMP, IRON SUSPENSION, 0.20 – 0.46 RANGE, 16K LBS
N107	6	10	NUT, SQUARE, 7/8"
N407	8	8	NUT, LOCK, MF TYPE, 7/8"
N407	4*	8*	NUT, LOCK, MF TYPE, 7/8"
P104	2*	2*	CLIP, BONDING, WITH 1/2" X 1 1/2" BOLT, 7/16" MAX. WIRE
P207	6	10	CLIP, BONDING, FOR 7/8" DIA. BOLT, 5/16" MAX. WIRE
V102	4	4	GAIN PLATE, 3" X 9 1/2" X 1/4", 15/16" HOLE
V202	4	4	TIE PLATE, RIBBED, 3" X 9 1/2" X 1/4", 15/16" HOLE
W207	10	14	WASHER, SPRING, 15/16" HOLE
W504	4	4	WASHER, SQ. CURVED, 4" X 1/4", 15/16" HOLE
W504	4*	8*	WASHER, SQ. CURVED, 4" X 1/4", 15/16" HOLE
X231	1	1	X-ARM ASSEMBLY, 3 5/8" X 9 1/2" X 26'-0", TYPE 54, DOUBLE ARM W/ SPACERS
Y100	1	1	X-BRACE ASSEMBLY, 3 3/8" X 4 3/8", 12'-6" SPACING, W/ 7/8" X 16" & 18" BOLTS
Y300	2	2	BRACE, VEE, 3 3/8" X 5 3/8", 7'-3" SPACING

NOTES:

1. FIELD DRILLED HOLES SHALL BE THOROUGHLY TREATED.
2. FOR STRENGTH LIMITATION OF OVERHEAD GROUND WIRE SUPPORT ASSEMBLY, SEE TM-7.
3. MAXIMUM STRENGTH OF X-BRACE IS 20,000 LBS.
4. (*) IMPLIES ITEMS SUPPLIED BY X-BRACE OR CROSSARM MANUFACTURER.
5. **USE TH-1AAXX-V0 FRAMING ON 85'-0" POLES & HIGHER, UNLESS CALLED OUT ON PLAN AND PROFILE AND STAKING SHEETS.
6. SEE TM-9 FOR POLE GROUNDING DETAILS.

SHEET TITLE
TRANSMISSION LINE STRUCTURE
TANGENT H-FRAME
DOUBLE ARM, OUTSIDE V-BRACE

REFERENCE SHEET: 1 OF 1
EXHIBIT NUMBER: TH-1AAX-V0,TH-1AAXX-V0

POWDER RIVER ENERGY CORPORATION

HDR

ISSUE	DATE	DESCRIPTION
B	8/3/2018	ISSUED FOR BID
A	6/5/2018	ISSUED FOR REVIEW

PROJECT MANAGER	R. JACKSON
PROJECT ENGINEER	J. PANKRATZ
DESIGN ENGINEER	J. PANKRATZ
CAD TECHNICIAN	Z. JANSEN
PROJECT NUMBER	

POWDER RIVER ENERGY CORP
SUNDANCE, WYOMING

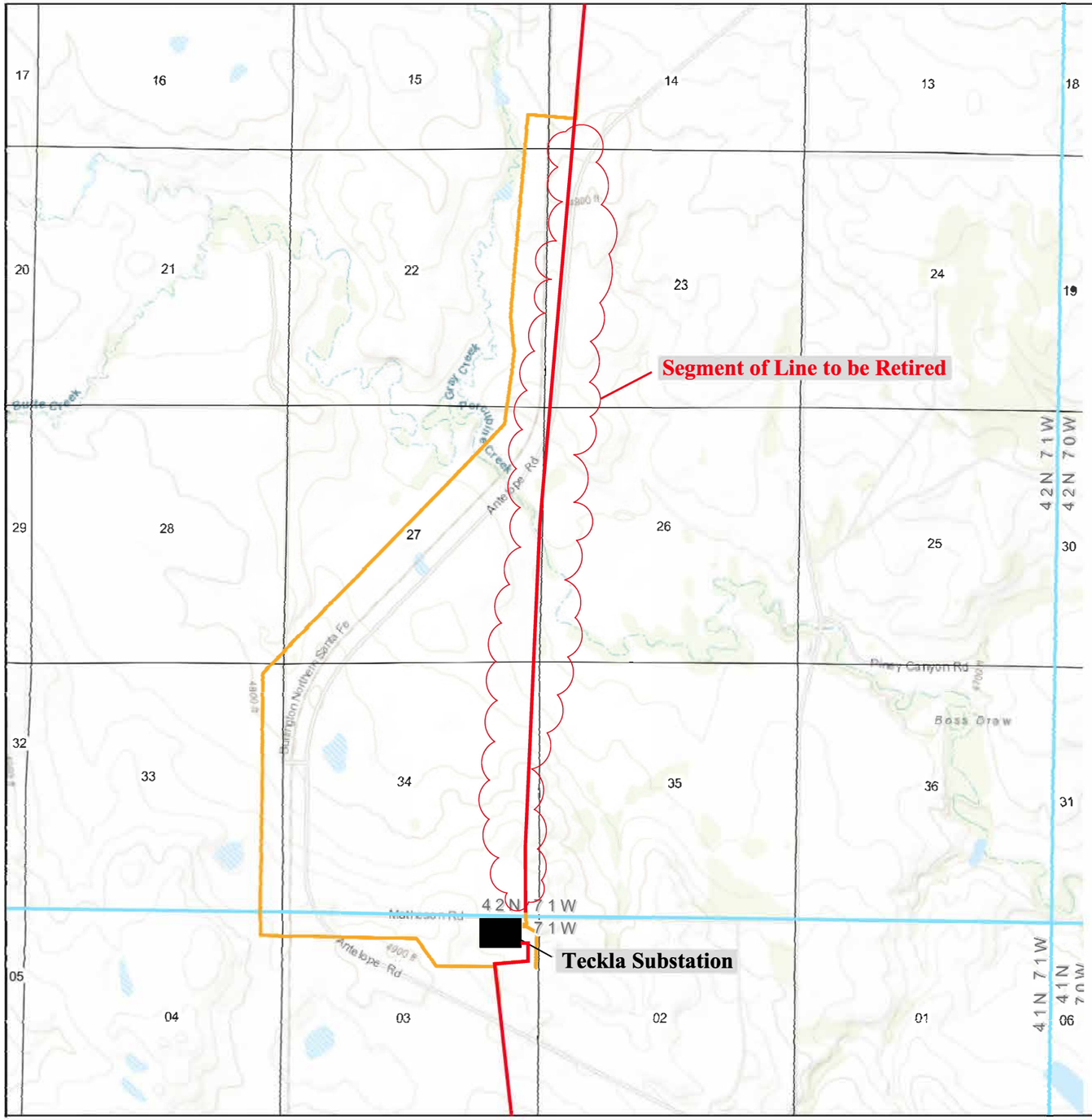
STANDARD STRUCTURE DRAWINGS
69KV TRANSMISSION LINE

STRUCTURE DETAILS
TH-1AAX-V0
TH-1AAXX-V0

0 1" 2"

FILENAME: SSD-02.dwg
SCALE: 3/16" = 1'-0"

SHEET: **SSD-02**



Approximate Alignment Description:

A tract of land located in the Sections 14, 15, 22, 27, 28 and 33 of Township 42 North, Range 71 West; Sections 03 and 04 of Township 41 North, Range 71 West, 6th P.M. Crook County, State of Wyoming.

Course 1: Commencing at the South West corner of Section 14, T.42N, R.71W; Thence North 24°12'53" East, a distance of 1389.57 feet to the Point of Beginning. Thence South 02°44'48"West, a distance of 625.54 feet; Thence North 87°21'14"West, a distance of 993.24 feet; Thence South 02°52'46"West, a distance of 4196.53 feet; Thence South 08°51'22"East, a distance of 716.34 feet; Thence South 05°50'51"West, a distance of 1519.72 feet; Thence South 42°11'20"West, a distance of 7195.05 feet; Thence South 01°24'06" East, a distance of 5437.48 feet; Thence North 88°59'29" East, a distance of 3240.08 feet; Thence South 37°55'25" East, a distance of 711.44 feet; Thence North 88°20'26" East, a distance of 1227.83 feet;
Thence South 08°21'29" East, a distance of 49.66 feet to a Point of Terminus, said point being located South 37°46'37" West, a distance of 1406.31 feet from the North East corner of Section 03, T.41N, R.71W.

Course 2: Commencing at the North East corner of Section 03, T.41N, R.71W; Thence South 01°46'54" West, a distance of 1053.97 feet to the Point of Beginning. Thence North 01°07'55" West, a distance of 730.63 feet; Thence North 61°32'39" West, a distance of 226.41 feet; Thence North 83°38'42" West, a distance of 232.72 feet to a Point of Terminus (Tekla Sub), said point being located South 68°22'25" West, a distance of 513.71 feet from the North East corner of Section 03, T.41N, R.71W.

Course 3: Commencing at the North East corner of Section 03, T.41N, R.71W; Thence South 69°18'57" West, a distance of 441.67 feet to the Point of Beginning (Tekla Sub). Thence North 89°56'55" East, a distance of 145.20 feet; Thence
North 01°21'03" West, a distance of 254.68 feet to a Point of Terminus (Porcupine Sub), said point being located North 70°11'02" West, a distance of 291.25 feet from the South East corner of Section 34, T.42N, R.71W.

*Bearings and Distances are based upon NAD83(2011) Wyoming State Plane, East Central Zone, US Feet.

This drawing depicts the approximate power line location.

ISSUED FOR PERMITTING

N

0 1,500 3,000
Feet

USGS QUADRANGLE TOPOGRAPHICAL NAMES	
TECKLA (43105-E3)	TECKLA SW (43105-E4)

POWDER RIVER ENERGY CORPORATION
A Touchstone Energy® Cooperative

HDR

ISSUE	DATE	DESCRIPTION
A	4/22/2019	ISSUED FOR PERMITTING

PROJECT MANAGER	J CARLSON
PROJECT ENGINEER	
DESIGN ENGINEER	Z. HOLMES
CAD/ TECHNICIAN	Z. JANSEN
GIS TECHNICIAN	K. BURKE
PROJECT NUMBER	10124512

LEGEND
- Existing Alignment
- Proposed Alignment
- Township & Range
- Sections

POWDER RIVER ENERGY CORP
SUNDANCE, WYOMING

RENO - TECKLA
69 KV TRANSMISSION LINE

LEGAL DESCRIPTION

TOWNSHIPS: 41N, 42N
RANGES: 71W

Reno/Teckla 69kV Relocations
Budgetary Engineers Estimate

Reno/Teckla 69 kV Line Relocations Phase I		
69 kV Power Line (Labor & Materials)		$1,375,464
	subtotal	$1,375,464
*CONSISTS OF A 4.75 MILE SINGLE CIRCUIT 69KV Line w/ 795 ACSR CONDUCTOR ON H-FRAME CONSTRUCTION.		
ENGINEERING		
Project Management		$27,509
Engineering (Design, Construction Drawings, Material Lists, Contract Documents)		$55,019
Support - Permitting & Environmental		$6,877
Surveying (Right-of-Way & Construction)		$48,141
Project Closeout (Contract Closeout, As-Built Drawings)		$4,814
RIGHT OF WAY and EASEMENTS		$76,000
INSPECTION		
Construction Inspector		$8,906
CONTINGENCY - 20% (Labor & Materials)		$275,093
Total Project Cost		**$1,877,824**

H-Frame 115 kV Framing

Transmission Line (69 kV T-Line; 4.75 miles/25,080ft)

Units	Engineers Estimate					
	Est. Quantity	Average Labor Unit Prices	Est. Labor Cost	Average Material Unit Prices	Est. Material Cost	Extended Cost
TRANSMISSION LINE	25,080	ft				
LABOR AND MATERIALS						
POLE						
65-2 (typical)	114	1,350.00	153,900.00	2,200.00	250,800.00	404,700.00
						404,700.00
POLE TOP						
TH-1AAXX	42	2,200.00	92,400.00	3,500.00	147,000.00	239,400.00
TH-5A	10	4,500.00	45,000.00	4,750.00	47,500.00	92,500.00
						331,900.00
GUYS						
TG-12A	50	250.00	12,500.00	50.00	2,500.00	15,000.00
TG-12B	70	200.00	14,000.00	75.00	5,250.00	19,250.00
TG-12C	50	225.00	11,250.00	75.00	3,750.00	15,000.00
TM-CRG	170	50.00	8,500.00	20.00	3,400.00	11,900.00
TM-GSI-B	40	175.00	7,000.00	50.00	2,000.00	9,000.00
						70,150.00
ANCHORS						
TA-1S-2	170	200.00	34,000.00	100.00	17,000.00	51,000.00
TA-EXT (7 foot)	85	50.00	4,250.00	20.00	1,700.00	5,950.00
						56,950.00
CONDUCTOR						
795 "Drake" ACSR	75.24	1,750.00	131,670.00	1,750.00	131,670.00	263,340.00
3/8" EHS	50.16	750.00	37,620.00	400.00	20,064.00	57,684.00
795 Splice	16	250.00	4,000.00	80.00	1,280.00	5,280.00
3/8" Splice	4	250.00	1,000.00	65.00	260.00	1,260.00
TM-DPR	15	300.00	4,500.00	250.00	3,750.00	8,250.00
						335,814.00
GROUNDS						
TM-9A	114	150.00	17,100.00	50.00	5,700.00	22,800.00
						22,800.00
MISCELLANEOUS						
TM-101	18	150.00	2,700.00	150.00	2,700.00	5,400.00
TM-PA	12	125.00	1,500.00	100.00	1,200.00	2,700.00
Soil Reclamation	51	750.00	38,250.00	-	-	38,250.00
						46,350.00
SUBTOTALS		**Labor**	**621,140.00**	**Materials**	**647,524.00**	**1,268,664.00**
RETIREMENT (8000 ft)						
Poles	48	600.00	28,800.00		-	28,800.00
Pole Top Assemblies	24	750.00	18,000.00		-	18,000.00
Conductor (Conductor & Shield)	80	750.00	60,000.00		-	60,000.00
SUBTOTALS		**Labor**	**106,800.00**	**Materials**	**-**	**106,800.00**

UNITED STATES DEPARTMENT OF AGRICULTURE
RURAL UTILITIES SERVICE

FINANCIAL AND OPERATING REPORT
ELECTRIC DISTRIBUTION

INSTRUCTIONS - See help in the online application.

BORROWER DESIGNATION WY0025

PERIOD ENDED December, 2018 (Prepared with Audited Data)

BORROWER NAME Powder River Energy Corporation

This information is analyzed and used to determine the submitter's financial situation and feasibility for loans and guarantees. You are required by contract and applicable regulations to provide the information. The information provided is subject to the Freedom of Information Act (5 U.S.C. 552)

CERTIFICATION

We recognize that statements contained herein concern a matter within the jurisdiction of an agency of the United States and the making of a false, fictitious or fraudulent statement may render the maker subject to prosecution under Title 18, United States Code Section 1001.

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY PART 1788 OF 7 CFR CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1718 OF 7 CFR CHAPTER XVII

(check one of the following)

[X] All of the obligations under the RUS loan documents have been fulfilled in all material respects.

[ ] There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in Part D of this report.

Michael Easley

4/17/2019
DATE

PART A. STATEMENT OF OPERATIONS

ITEM	YEAR-TO-DATE			THIS MONTH
	LAST YEAR (*a*)	THIS YEAR (*b*)	BUDGET (*c*)	(*d*)
1. Operating Revenue and Patronage Capital	191,161,757	180,051,356	185,891,722	15,849,760
2. Power Production Expense				
3. Cost of Purchased Power	150,153,057	139,808,705	145,804,024	12,612,006
4. Transmission Expense	1,659,524	1,528,401	1,683,505	145,312
5. Regional Market Expense				
6. Distribution Expense - Operation	6,532,629	6,656,962	6,522,701	471,902
7. Distribution Expense - Maintenance	4,562,225	4,195,620	4,335,168	234,389
8. Customer Accounts Expense	2,449,307	2,456,009	2,580,801	216,904
9. Customer Service and Informational Expense	66,354	53,020	121,425	5,597
10. Sales Expense	3,409	4,955	14,004	1,082
11. Administrative and General Expense	6,355,030	6,170,748	6,992,751	856,698
12. Total Operation & Maintenance Expense (*2 thru 11*)	171,781,535	160,874,420	168,054,379	14,543,890
13. Depreciation and Amortization Expense	11,067,147	10,745,460	9,704,010	721,735
14. Tax Expense - Property & Gross Receipts	457,872	467,121	465,732	35,300
15. Tax Expense - Other	65,947	95,591	68,533	8,832
16. Interest on Long-Term Debt	6,185,953	6,230,814	6,037,902	544,974
17. Interest Charged to Construction - Credit				
18. Interest Expense - Other	434,033	446,054	346,800	175,845
19. Other Deductions	276,470	265,008	195,972	34,640
20. Total Cost of Electric Service (*12 thru 19*)	190,268,957	179,124,468	184,873,328	16,065,216
21. Patronage Capital & Operating Margins (*1 minus 20*)	892,800	926,888	1,018,394	(215,456)
22. Non Operating Margins - Interest	1,815,711	2,223,095	1,790,000	247,394
23. Allowance for Funds Used During Construction				
24. Income (Loss) from Equity Investments				
25. Non Operating Margins - Other	2,714,393	25,350	(17,617)	122,744
26. Generation and Transmission Capital Credits	6,976,828	19,782,308	6,000,000	19,782,308
27. Other Capital Credits and Patronage Dividends	249,301	255,108	207,000	
28. Extraordinary Items				
29. Patronage Capital or Margins (*21 thru 28*)	12,649,033	23,212,749	8,997,777	19,936,990

UNITED STATES DEPARTMENT OF AGRICULTURE
RURAL UTILITIES SERVICE

FINANCIAL AND OPERATING REPORT
ELECTRIC DISTRIBUTION

INSTRUCTIONS - See help in the online application.

BORROWER DESIGNATION: WY0025

PERIOD ENDED: December, 2018

PART B. DATA ON TRANSMISSION AND DISTRIBUTION PLANT

ITEM	YEAR-TO-DATE LAST YEAR (a)	YEAR-TO-DATE THIS YEAR (b)	ITEM	YEAR-TO-DATE LAST YEAR (a)	YEAR-TO-DATE THIS YEAR (b)
1. New Services Connected	391	346	5. Miles Transmission	713.16	713.16
2. Services Retired	171	108	6. Miles Distribution – Overhead	10,023.37	10,030.82
3. Total Services in Place	33,571	33,809	7. Miles Distribution - Underground	654.65	659.13
4. Idle Services (*Exclude Seasonals*)	6,808	6,866	**8. Total Miles Energized *(5 + 6 + 7)***	11,391.18	11,403.11

PART C. BALANCE SHEET

ASSETS AND OTHER DEBITS		LIABILITIES AND OTHER CREDITS	
1. Total Utility Plant in Service	386,436,130	30. Memberships	0
2. Construction Work in Progress	11,213,457	31. Patronage Capital	202,221,044
3. Total Utility Plant *(1 + 2)*	397,649,587	32. Operating Margins - Prior Years	0
4. Accum. Provision for Depreciation and Amort.	188,122,993	33. Operating Margins - Current Year	20,962,158
5. Net Utility Plant *(3 - 4)*	209,526,594	34. Non-Operating Margins	2,250,590
6. Non-Utility Property (Net)	111,669	35. Other Margins and Equities	8,633,168
7. Investments in Subsidiary Companies	0	**36. Total Margins & Equities *(30 thru 35)***	234,066,960
8. Invest. in Assoc. Org. - Patronage Capital	145,703,045	37. Long-Term Debt - RUS (Net)	34,082,198
9. Invest. in Assoc. Org. - Other - General Funds	0	38. Long-Term Debt - FFB - RUS Guaranteed	142,088,812
10. Invest. in Assoc. Org. - Other - Nongeneral Funds	2,676,734	39. Long-Term Debt - Other - RUS Guaranteed	0
11. Investments in Economic Development Projects	0	40. Long-Term Debt Other (Net)	6,775,030
12. Other Investments	885,097	41. Long-Term Debt - RUS - Econ. Devel. (Net)	0
13. Special Funds	27,873,145	42. Payments – Unapplied	27,043,776
14. Total Other Property & Investments *(6 thru 13)*	177,249,690	**43. Total Long-Term Debt *(37 thru 41 - 42)***	155,902,264
15. Cash - General Funds	7,836,206	44. Obligations Under Capital Leases - Noncurrent	12,992
16. Cash - Construction Funds - Trustee	400	45. Accumulated Operating Provisions and Asset Retirement Obligations	2,496,692
17. Special Deposits	0	**46. Total Other Noncurrent Liabilities *(44 + 45)***	2,509,684
18. Temporary Investments	51,041,939	47. Notes Payable	0
19. Notes Receivable (Net)	0	48. Accounts Payable	15,008,392
20. Accounts Receivable - Sales of Energy (Net)	15,637,992	49. Consumers Deposits	16,782,274
21. Accounts Receivable - Other (Net)	761,845		
22. Renewable Energy Credits	0	50. Current Maturities Long-Term Debt	6,778,296
23. Materials and Supplies - Electric & Other	6,319,586	51. Current Maturities Long-Term Debt - Economic Development	0
24. Prepayments	351,136	52. Current Maturities Capital Leases	0
25. Other Current and Accrued Assets	145,343	53. Other Current and Accrued Liabilities	3,856,885
26. Total Current and Accrued Assets *(15 thru 25)*	82,094,447	**54. Total Current & Accrued Liabilities *(47 thru 53)***	42,425,847
27. Regulatory Assets	0	55. Regulatory Liabilities	5,502,810
28. Other Deferred Debits	255,134	56. Other Deferred Credits	28,718,300
29. Total Assets and Other Debits *(5+14+26 thru 28)*	469,125,865	**57. Total Liabilities and Other Credits *(36 + 43 + 46 + 54 thru 56)***	469,125,865

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART D. NOTES TO FINANCIAL STATEMENTS

1.

The Cooperative has a non-contributory defined benefit pension plan for its employees. The plan is administered by the National Rural Electric Cooperative Association (NRECA) through a trustee. The Cooperative makes annual contributions to the plan equal to the amounts accrued for pension expense. In the multi-employer plan, which is available to all members of the NRECA, the accumulated benefits and plan assets are not determined or allocated separately by the individual employers. It is a funded plan and pension cost for the year ended December 31, 2018 is $2,739,231.

2.

The Cooperative has a 401(k) savings plan for its employees. The Cooperative's 401(k) contribution for the year ended December 31, 2018 was $589,267.

3.

The Cooperative has a postretirement benefit plan for its employees that will provide health insurance coverage for quasi-retired employees, defined as reaching age 62 or completed 31 years of cooperative service, has completed a minimum of 8 years of continuous service with the Cooperative, and was hired before November 1, 2016. The benefit will be allocated to an employee's Health Reimbursement Arrangement (HRA) and will be calculated based upon the company's average monthly medical insurance plan liability at the actual date of retirement multiplied by either 36 months or the number of months until the retiree reaches age sixty-five. The Cooperative has elected to pay as you go and not fund this benefit. The total liability recognized on the balance sheet as of December 31, 2018 is $2,414,541.

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
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PART D. NOTES TO FINANCIAL STATEMENTS

4.

The Cooperative, with the approval of RUS and its Board of Directors, adopted a Revenue Deferral Plan in 2009, deferring a cumulative amount of $7,520,000 through 2012. In 2013, $4,500,000 of the revenue was recognized. In 2014, the Cooperative deferred $4,200,000, and in 2015 deferred $2,050,000. In 2016, $8,375,000 was recognized. In 2017, the Cooperative deferred $1,400,000. The balance of $2,295,000 is funded by PRECorp's cushion of credit account

5. Tier YTD: 4.73

6. Margins and equities as a percentage of assets: 49.89%

7.

The Cooperative evaluates the components of the annual test for maintenance of its tax-exempt status under Section 501(c)(12) of the Internal Revenue Code of 1986, as amended. This process includes an analysis of whether the position the Cooperative takes with regard to a particular item of income would meet the definition of an uncertain tax position under FASB Interpretation No. 48, *Accounting for Uncertainty in Income Taxes.*

Part A: Statement of Operations

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART D. NOTES TO FINANCIAL STATEMENTS

Line 19 - Other Deductions:	$265,008
Misc Amort - MT Mine Acquisition:	$5,144
Misc Amort – Tri-State G&T Purchase$4,942	
Scholarships from Unclaimed Capital Credits:$28,500	
Donations from Unclaimed Capital Credits: $25,500	
Donations:	$27,923
Donations – Econ Dev Grant:	$13,750
Donations - PRECorp Foundation:	$40,279
Donations – CFC Integrity Fund:	$2,664
Other Deductions:	$15,287
Other Deductions - Work Order Abandonment:	$65,160
Economic Development – App Developer:	$14,062
Economic Development – Legal Fees:	$400
Economic Development – Creative Marketing:$8,212	
Economic Development – PRECorp Labor:	$3,185

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
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PART D. NOTES TO FINANCIAL STATEMENTS

Interest on Economic Development Loan:	$10,000
Part C: Assets and Other Debits	
Line 6 - Non-Utility Property:$111,670	
Leased Building - Western States (net):$99,815	
Leased Building – Newcastle Fire (net):$11,855	
Line 13 - Special Funds:	$27,873,145
Special Fund - CBM Cost of Retirement:	$19,274,306
Special Fund - CBM Risk Management Fund:	$7,152,265
Special Fund - Basin Economic Development Fund:	$1,070,879
Special Fund - Energy Conservation Loans:	$293,544
Special Fund - Deferred Compensation & 401K:	$82,151

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART D. NOTES TO FINANCIAL STATEMENTS

Line 25 - Other Current and Accrued Assets:	$145,343
Interest & Dividends Receivable - Short Term Investments:	$143,790
Interest & Dividends Receivable - Basin Economic Development Loan:	$1,553
Line 28 - Other Deferred Debits:	$255,135
Preliminary Survey & Investment:	$182,666
Transportation Expense Clearing:	$2,026
Miscellaneous Deferred Debit:	$2,005
Windy Ridge Lease:	$30,000
Miscellaneous Deferred Debit – PV Grant:	$(1,715)
Miscellaneous Deferred Debit – Alliance Pmt TE:	$2,655
Miscellaneous Deferred Debit - Restitution/Damage:	$4,692
Miscellaneous Deferred Debit- Heat Rate Credit:	$32,806
Part C: Liabilities and Other Credits	

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART D. NOTES TO FINANCIAL STATEMENTS

Line 44 - Obligations under Capital Leases – Noncurrent:	$12,992
Obligations under Capital Leases - Pitney Bowes:	$12,992
Line 45 - Accum Operating Prov & Asset Retirement Obligations:	$2,496,692
Pension Plan:	$2,414,541
Deferred 401k:	$82,151
Line 50 - Current Maturities Long Term Debt:	$6,778,296
RUS:	$2,419,376
FFB:	$3,728,733
CoBank:	$630,187
Line 53 - Other Current & Accrued Liabilities:	$3,856,885

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART D. NOTES TO FINANCIAL STATEMENTS

Accrued Property Tax:	$589,297
Accrued Taxes - Federal Unemployment:	$105
Accrued State Sales Tax:	$452,021
Accrued State Use Tax:	$200
Accrued Taxes - Franchise:	$65,870
Accrued Taxes - Montana Wholesale Energy:$4,254	
Accrued Interest - Long Term Debt:$20,469	
Interest Accrued - Deposits:$54,639	
Interest Accrued - Basin Economic Development Loans:$833	
Accrued Liability - Employee Leave:$1,907,647	
Accrued Liability - Lineman Scholarship:$167	
Accrued Liability - Section 125 FSA:$5,482	
Accrued Liability – Teamshare:	$355,464
Accrued Payroll:	$258,026
Accrued Liability - Employee Earned HRA:	$1,725
Accrued Liability – Med Insurance Claims:	$140,686

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART D. NOTES TO FINANCIAL STATEMENTS

Line 55 - Regulatory Liabilities: $5,502,810

Other Regulatory Liabilities: $3,207,810

Regulatory Liability - Deferred Revenue: $2,295,000

Plan provides for the following recognition

2019 $895,000

2020 $1,400,000

Line 56 - Other Deferred Credits: $28,718,300

Customer Advance for Construction: $904,283

Cust Advance for Construction - Risk Management Fund CBM: $7,152,264

Customer Advance for Construction - Uranium Deposits: $715,852

Customer Advance for Construction - Oneok:$187,056

Other Deferred Credits: $300

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART D. NOTES TO FINANCIAL STATEMENTS

CBM Cost of Retirement:	$19,244,470
Deferred Credit – W.S. Deposits:$1,200	
Deferred Credit - Prepaid Demand – NON-CBM:	$41,938
Deferred Credit - Prepaid Demand – CBM:	$88,179
Other Deferred Credits – AR Credit Balance:	$382,758

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART D. CERTIFICATION LOAN DEFAULT NOTES

UNITED STATES DEPARTMENT OF AGRICULTURE
RURAL UTILITIES SERVICE

FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION

INSTRUCTIONS - See help in the online application.

BORROWER DESIGNATION: WY0025

PERIOD ENDED: December, 2018

PART E. CHANGES IN UTILITY PLANT

PLANT ITEM	BALANCE BEGINNING OF YEAR (a)	ADDITIONS (b)	RETIREMENTS (c)	ADJUSTMENTS AND TRANSFERS (d)	BALANCE END OF YEAR (e)
1. Distribution Plant	268,602,386	5,082,967	1,205,237		272,480,116
2. General Plant	26,720,376	1,553,654	530,131		27,743,899
3. Headquarters Plant	10,121,882	133,806			10,255,688
4. Intangibles	368,367				368,367
5. Transmission Plant	75,417,537	88,417	1,750		75,504,204
6. Regional Transmission and Market Operation Plant	0				0
7. All Other Utility Plant	93,941			(10,086)	83,855
8. Total Utility Plant in Service (*1 thru 7*)	381,324,489	6,858,844	1,737,118	(10,086)	386,436,129
9. Construction Work in Progress	7,546,815	3,666,643			11,213,458
10. Total Utility Plant (*8 + 9*)	388,871,304	10,525,487	1,737,118	(10,086)	397,649,587

PART F. MATERIALS AND SUPPLIES

ITEM	BALANCE BEGINNING OF YEAR (a)	PURCHASED (b)	SALVAGED (c)	USED (NET) (d)	SOLD (e)	ADJUSTMENT (f)	BALANCE END OF YEAR (g)
1. Electric	6,524,406	1,511,072	84,402	1,741,382	31,420	(34,534)	6,312,544
2. Other	7,403			361			7,042

PART G. SERVICE INTERRUPTIONS

ITEM	AVERAGE MINUTES PER CONSUMER BY CAUSE				
	POWER SUPPLIER (a)	MAJOR EVENT (b)	PLANNED (c)	ALL OTHER (d)	TOTAL (e)
1. Present Year	11.260		10.490	147.180	168.930
2. Five-Year Average	15.482		20.522	186.168	222.172

PART H. EMPLOYEE-HOUR AND PAYROLL STATISTICS

1. Number of Full Time Employees	125	4. Payroll - Expensed	6,717,881
2. Employee - Hours Worked - Regular Time	268,617	5. Payroll – Capitalized	2,693,826
3. Employee - Hours Worked - Overtime	12,592	6. Payroll - Other	2,434,033

PART I. PATRONAGE CAPITAL

ITEM	DESCRIPTION	THIS YEAR (a)	CUMULATIVE (b)
1. Capital Credits - Distributions	a. General Retirements	8,617,320	82,473,796
	b. Special Retirements	419,918	6,929,389
	c. Total Retirements (*a + b*)	9,037,238	89,403,185
2. Capital Credits - Received	a. Cash Received From Retirement of Patronage Capital by Suppliers of Electric Power	6,172,149	
	b. Cash Received From Retirement of Patronage Capital by Lenders for Credit Extended to the Electric System	76,245	
	c. Total Cash Received (*a + b*)	6,248,394	

PART J. DUE FROM CONSUMERS FOR ELECTRIC SERVICE

1. Amount Due Over 60 Days	$ 43,418	2. Amount Written Off During Year	$ 82,550

ENERGY EFFICIENCY AND CONSERVATION LOAN PROGRAM

1. Anticipated Loan Delinquency %		4. Anticipated Loan Default %	
2. Actual Loan Delinquency %		5. Actual Loan Default %	
3. Total Loan Delinquency Dollars YTD	$	6. Total Loan Default Dollars YTD	$

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application	PERIOD ENDED December, 2018

PART K. kWh PURCHASED AND TOTAL COST

No	ITEM	SUPPLIER CODE	RENEWABLE ENERGY PROGRAM NAME	RENEWABLE FUEL TYPE	kWh PURCHASED	TOTAL COST	AVERAGE COST (Cents/kWh)	INCLUDED IN TOTAL COST - FUEL COST ADJUSTMENT	INCLUDED IN TOTAL COST - WHEELING AND OTHER CHARGES
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
1	Members 1st Power Cooperative (WY)	800602			2,175,921,808	137,878,373	6.34		126,331
2	Members 1st Power Cooperative (WY)	800602	WAPA	Hydro	82,023,812	1,876,986	2.29		
3	Black Hills Electric Coop, Inc (SD0013)	1769			743,336	53,223	7.16		
4	*Residential Renewable Supplier	700200	Small Power Production	Solar - photvoltaic	9,191	123	1.34		
	Total				2,258,698,147	139,808,705	6.19		126,331

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application	PERIOD ENDED December, 2018

PART K. kWh PURCHASED AND TOTAL COST

No	Comments
1	
2	
3	
4	Small Power Production - Solar - Photovoltaic refers to the kWh that Powder River Energy Corporation bought from consumers on the Small Power Production rate. The consumer has solar power production facilities.

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART L. LONG-TERM LEASES

No	NAME OF LESSOR (a)	TYPE OF PROPERTY (b)	RENTAL THIS YEAR (c)
	TOTAL		

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART M. ANNUAL MEETING AND BOARD DATA

1. Date of Last Annual Meeting	2. Total Number of Members	3. Number of Members Present at Meeting	4. Was Quorum Present?
8/25/2018	12,287	223	Y
5. Number of Members Voting by Proxy or Mail	**6. Total Number of Board Members**	**7. Total Amount of Fees and Expenses for Board Members**	**8. Does Manager Have Written Contract?**
163	10	$ 161,233	Y

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION**	BORROWER DESIGNATION WY0025
INSTRUCTIONS - See help in the online application.	PERIOD ENDED December, 2018

PART N. LONG-TERM DEBT AND DEBT SERVICE REQUIREMENTS

No	ITEM	BALANCE END OF YEAR (a)	INTEREST (Billed This Year) (b)	PRINCIPAL (Billed This Year) (c)	TOTAL (Billed This Year) (d)
1	Rural Utilities Service (Excludes RUS - Economic Development Loans)	34,082,198	1,747,633	2,384,104	4,131,737
2	National Rural Utilities Cooperative Finance Corporation	0	12,147	537,598	549,745
3	CoBank, ACB	5,775,030	263,656	1,378,325	1,641,981
4	Federal Financing Bank	142,088,812	4,207,100	3,427,901	7,635,001
5	RUS - Economic Development Loans				
6	Payments Unapplied	27,043,776			
7	Principal Payments Received from Ultimate Recipients of IRP Loans				
8	Principal Payments Received from Ultimate Recipients of REDL Loans				
9	Principal Payments Received from Ultimate Recipients of EE Loans				
10	Basin Economic Development Loan	1,000,000	10,000		10,000
11	Obligations - Capital Lease	12,992	278	8,498	8,776
	TOTAL	155,915,256	6,240,814	7,736,426	13,977,240

UNITED STATES DEPARTMENT OF AGRICULTURE
RURAL UTILITIES SERVICE

FINANCIAL AND OPERATING REPORT
ELECTRIC DISTRIBUTION

INSTRUCTIONS - See help in the online application.

BORROWER DESIGNATION: WY0025

PERIOD ENDED: December, 2018

PART O. POWER REQUIREMENTS DATABASE - ANNUAL SUMMARY

CLASSIFICATION	CONSUMER SALES & REVENUE DATA	DECEMBER (a)	AVERAGE NO. CONSUMERS SERVED (b)	TOTAL YEAR TO DATE (c)
1. Residential Sales (excluding seasonal)	a. No. Consumers Served	15,172	15,077	
	b. kWh Sold			209,292,895
	c. Revenue			23,269,479
2. Residential Sales - Seasonal	a. No. Consumers Served	3,350	3,384	
	b. kWh Sold			9,587,320
	c. Revenue			1,893,530
3. Irrigation Sales	a. No. Consumers Served	241	237	
	b. kWh Sold			4,168,911
	c. Revenue			551,292
4. Comm. and Ind. 1000 KVA or Less	a. No. Consumers Served	8,093	8,016	
	b. kWh Sold			661,275,583
	c. Revenue			64,414,157
5. Comm. and Ind. Over 1000 KVA	a. No. Consumers Served	57	58	
	b. kWh Sold			1,295,709,609
	c. Revenue			86,343,419
6. Public Street & Highway Lighting	a. No. Consumers Served	28	28	
	b. kWh Sold			903,582
	c. Revenue			97,437
7. Other Sales to Public Authorities	a. No. Consumers Served			
	b. kWh Sold			
	c. Revenue			
8. Sales for Resale - RUS Borrowers	a. No. Consumers Served	2	2	
	b. kWh Sold			1,118,209
	c. Revenue			70,853
9. Sales for Resale - Other	a. No. Consumers Served			
	b. kWh Sold			
	c. Revenue			
10. Total No. of Consumers (*lines 1a thru 9a*)		26,943	26,802	
11. Total kWh Sold (*lines 1b thru 9b*)				2,182,056,109
12. Total Revenue Received From Sales of Electric Energy (*lines 1c thru 9c*)				176,640,167
13. Transmission Revenue				
14. Other Electric Revenue				3,411,190
15. kWh - Own Use				2,607,139
16. Total kWh Purchased				2,258,698,147
17. Total kWh Generated				
18. Cost of Purchases and Generation				141,337,106
19. Interchange - kWh - Net				
20. Peak - Sum All kW Input (Metered) Non-coincident___ Coincident X				343,535

UNITED STATES DEPARTMENT OF AGRICULTURE
RURAL UTILITIES SERVICE

FINANCIAL AND OPERATING REPORT
ELECTRIC DISTRIBUTION

INSTRUCTIONS - See help in the online application.

BORROWER DESIGNATION WY0025

PERIOD ENDED December, 2018

PART P. ENERGY EFFICIENCY PROGRAMS

CLASSIFICATION	ADDED THIS YEAR			TOTAL TO DATE		
	No. of Consumers *(a)*	Amount Invested *(b)*	Estimated MMBTU Savings *(c)*	No. of Consumers *(d)*	Amount Invested *(e)*	Estimated MMBTU Savings *(f)*
1. Residential Sales (excluding seasonal)	6	11,297	9	95	108,038	686
2. Residential Sales - Seasonal						
3. Irrigation Sales						
4. Comm. and Ind. 1000 KVA or Less						
5. Comm. and Ind. Over 1000 KVA						
6. Public Street and Highway Lighting						
7. Other Sales to Public Authorities						
8. Sales for Resale – RUS Borrowers						
9. Sales for Resale – Other						
10. Total	6	11,297	9	95	108,038	686

UNITED STATES DEPARTMENT OF AGRICULTURE
RURAL UTILITIES SERVICE

FINANCIAL AND OPERATING REPORT
ELECTRIC DISTRIBUTION
INVESTMENTS, LOAN GUARANTEES AND LOANS

BORROWER DESIGNATION
WY0025

PERIOD ENDED
December, 2018

INSTRUCTIONS - Reporting of investments is required by 7 CFR 1717, Subpart N. Investment categories reported on this Part correspond to Balance Sheet items in Part C. Identify all investments in Rural Development with an 'X' in column (e). Both 'Included' and 'Excluded' Investments must be reported. See help in the online application.

PART Q. SECTION I. INVESTMENTS (See Instructions for definitions of Income or Loss)

No	DESCRIPTION (a)	INCLUDED ($) (b)	EXCLUDED ($) (c)	INCOME OR LOSS ($) (d)	RURAL DEVELOPMENT (e)
1	**Non-Utility Property (NET)**				
	HD - Supply		99,815		
	Newcastle Fire		11,855		
	Totals		111,670		
2	**Investments in Associated Organizations**				
	Basin Electric Capital Credits Membership		111,082,995		
	NRUCFC Capital Credits, Membership, CTCs, MCS		2,973,537		
	Members 1st Power Cooperative		26,760,162		
	Range Telephone Capital Credits	297,753			
	Black Hills Electric Capital Credits	55,034			
	Clearwave Investments	1,000			
	Arkansas Electric Capital Credits	1,796			
	NRTC Capital Credits Membership	1,453			
	NISC Capital Credits, Membership	130,155			
	Johnson Co Coop Capital Credits	1,863			
	NRECA Membership	10			
	CoBank Capital Credits	303,138			
	Federated Insurance Capital Credits	745,186			
	Big Horn Coop Capital Credits	30			
	Tri State Electric Capital Credits		6,025,667		
	Totals	1,537,418	146,842,361		
4	**Other Investments**				
	Line Extension	871,786			
	Energy Conservation Loans	13,311			X
	Totals	885,097			
5	**Special Funds**				
	COR Fund	1,674,306	17,600,000		
	Risk Management Fund	7,152,264			
	Basin Economic Development Fund	420,879	650,000		
	Home Efficiency Loan Program Fund	43,544	250,000		
	Deferred Compensation		82,151		
	Totals	9,290,993	18,582,151		
6	**Cash - General**				
	Sundance State Bank	199,801	837,947		
	Sundance State Bank Insured Cash Sweep		6,594,801		
	Moorcroft - Pinnacle		3,510		
	Newcastle - 1st State		3,144		
	Hulett-Summit		3,333		
	Upton-1st Tier		5,996		
	Gillette - 1st Nat'l Bank		198,064		
	Working Funds		(10,390)		
	Totals	199,801	7,636,405		
8	**Temporary Investments**				
	Rushmore Electric		20,016		
	CP Investment	51,021,923			
	Totals	51,021,923	20,016		
9	**Accounts and Notes Receivable - NET**				
	A/R - Other	761,845			
	Totals	761,845			
11	TOTAL INVESTMENTS (1 thru 10)	63,697,077	173,192,603		

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION INVESTMENTS, LOAN GUARANTEES AND LOANS**	BORROWER DESIGNATION WY0025 PERIOD ENDED December, 2018

INSTRUCTIONS - Reporting of investments is required by 7 CFR 1717, Subpart N. Investment categories reported on this Part correspond to Balance Sheet items in Part C. Identify all investments in Rural Development with an 'X' in column (e). Both 'Included' and 'Excluded' Investments must be reported. See help in the online application.

PART Q. SECTION II. LOAN GUARANTEES

No	ORGANIZATION (a)	MATURITY DATE (b)	ORIGINAL AMOUNT ($) (c)	LOAN BALANCE ($) (d)	RURAL DEVELOPMENT (e)
	TOTAL				
	TOTAL (Included Loan Guarantees Only)				

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL UTILITIES SERVICE **FINANCIAL AND OPERATING REPORT ELECTRIC DISTRIBUTION INVESTMENTS, LOAN GUARANTEES AND LOANS**	BORROWER DESIGNATION WY0025 PERIOD ENDED December, 2018

INSTRUCTIONS - Reporting of investments is required by 7 CFR 1717, Subpart N. Investment categories reported on this Part correspond to Balance Sheet items in Part C. Identify all investments in Rural Development with an 'X' in column (e). Both 'Included' and 'Excluded' Investments must be reported. See help in the online application.

SECTION III. RATIO

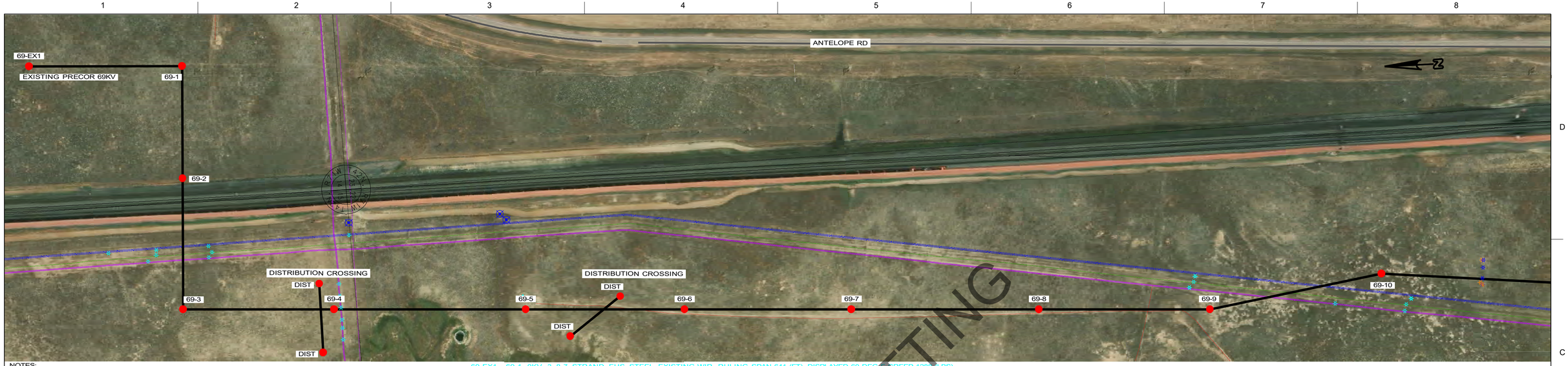
RATIO OF INVESTMENTS AND LOAN GUARANTEES TO UTILITY PLANT [Total of Included Investments (Section I, 11b) and Loan Guarantees - Loan Balance (Section II, 5d) to Total Utility Plant (Line 3, Part C) of this report]	16.02 %

SECTION IV. LOANS

No	ORGANIZATION (a)	MATURITY DATE (b)	ORIGINAL AMOUNT ($) (c)	LOAN BALANCE ($) (d)	RURAL DEVELOPMENT (e)
1	Employees, Officers, Directors		835	199	
2	Energy Resources Conservation Loans		22,445	13,311	
	TOTAL		23,280	13,510	

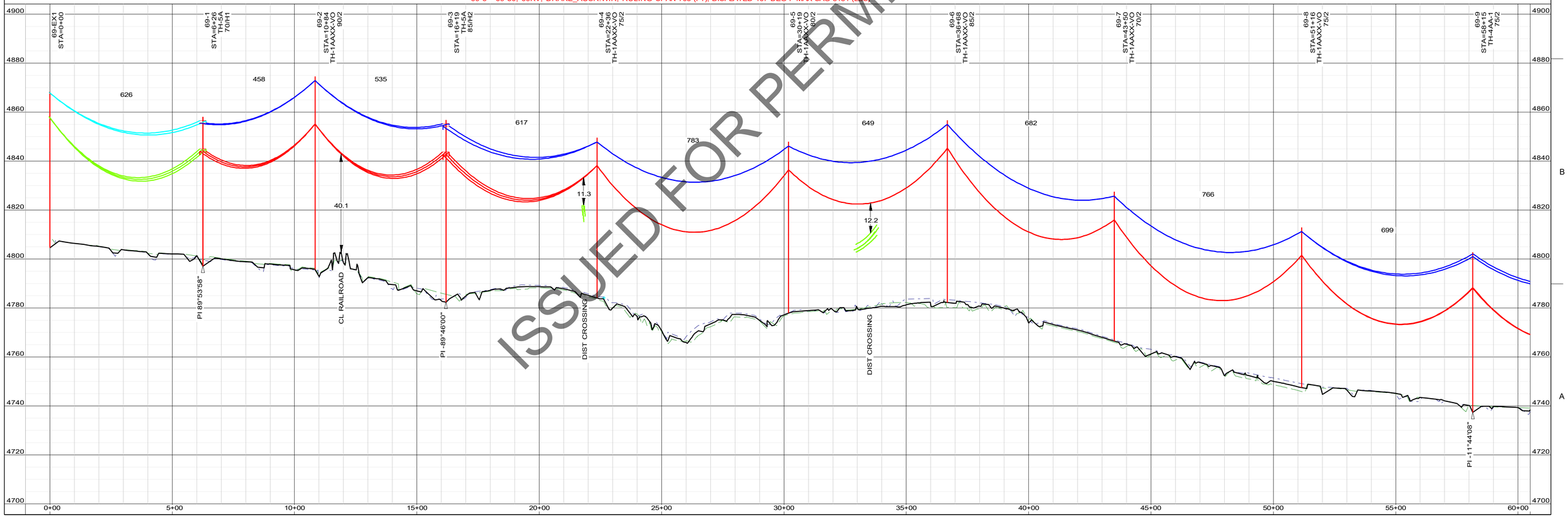
PLS-CADD DRAWIN

Exhibit 5 10014-200-CA-19



NOTES:
1) ALL STRUCTURES ARE TO BE SET AT 10% OF THE TOTAL POLE LENGTH PLUS 2FT UNLESS NOTED OTHERWISE.

69-EX1 - 69-1, 0KV, 3_8-7_STRAND_EHS_STEEL_EXISTING.WIR, RULING SPAN 641 (FT), DISPLAYED 60 DEG F CREEP 1283 (LBS)
69-EX1 - 69-1, 0KV, 3_8-7_STRAND_EHS_STEEL_EXISTING.WIR, RULING SPAN 615 (FT), DISPLAYED 60 DEG F CREEP 1288 (LBS)
69-EX1 - 69-1, 69KV, DRAKE_ACSR_EXISTING.WIR, RULING SPAN 628 (FT), DISPLAYED 167 DEG F CREEP 2924 (LBS)
69-1 - 69-3, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 504 (FT), DISPLAYED 60 DEG F INITIAL 1177 (LBS)
69-1 - 69-3, 69KV, DRAKE_ACSR.WIR, RULING SPAN 500 (FT), DISPLAYED 167 DEG F MAX SAG 2548 (LBS)
69-3 - 69-30, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 703 (FT), DISPLAYED 60 DEG F INITIAL 1343 (LBS)
69-3 - 69-30, 69KV, DRAKE_ACSR.WIR, RULING SPAN 703 (FT), DISPLAYED 167 DEG F MAX SAG 3184 (LBS)



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A	4/26/2019	ISSUED FOR PERMITTING

PROJECT MANAGER	J. CARLSON
PROJECT ENGINEER	-
DESIGN ENGINEER	Z. HOLMES
CAD TECHNICIAN	Z. JANSEN
WORK ORDER	-
PROJECT NUMBER	10124612

POWDER RIVER ENERGY CORP
SUNDANCE, WYOMING

RENO - TECKLA
69 KV TRANSMISSION LINE

PLAN & PROFILES

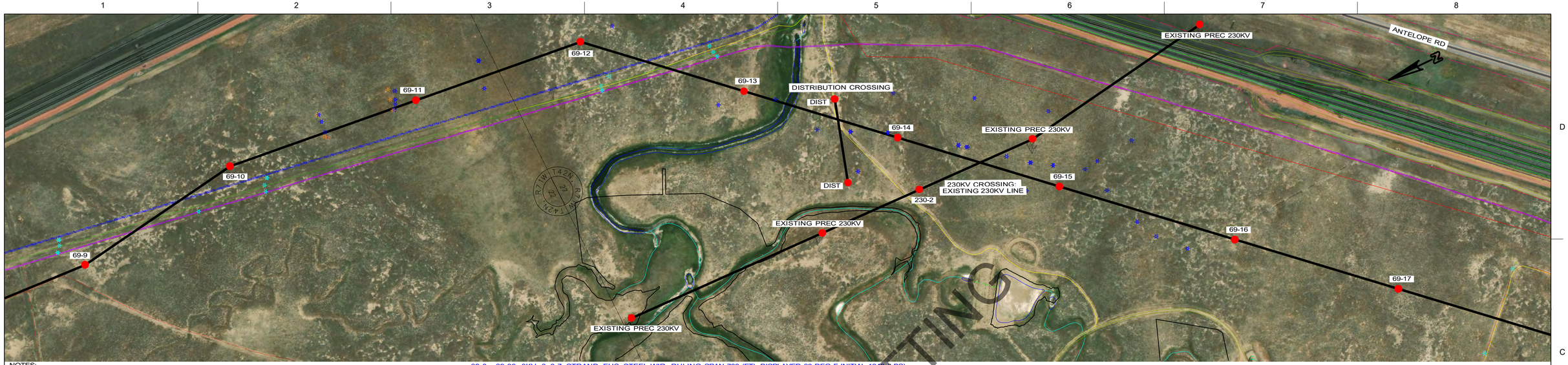
0 1" 2"

SCALE H:1"=200` V:1"=20`

SHEET PP-1

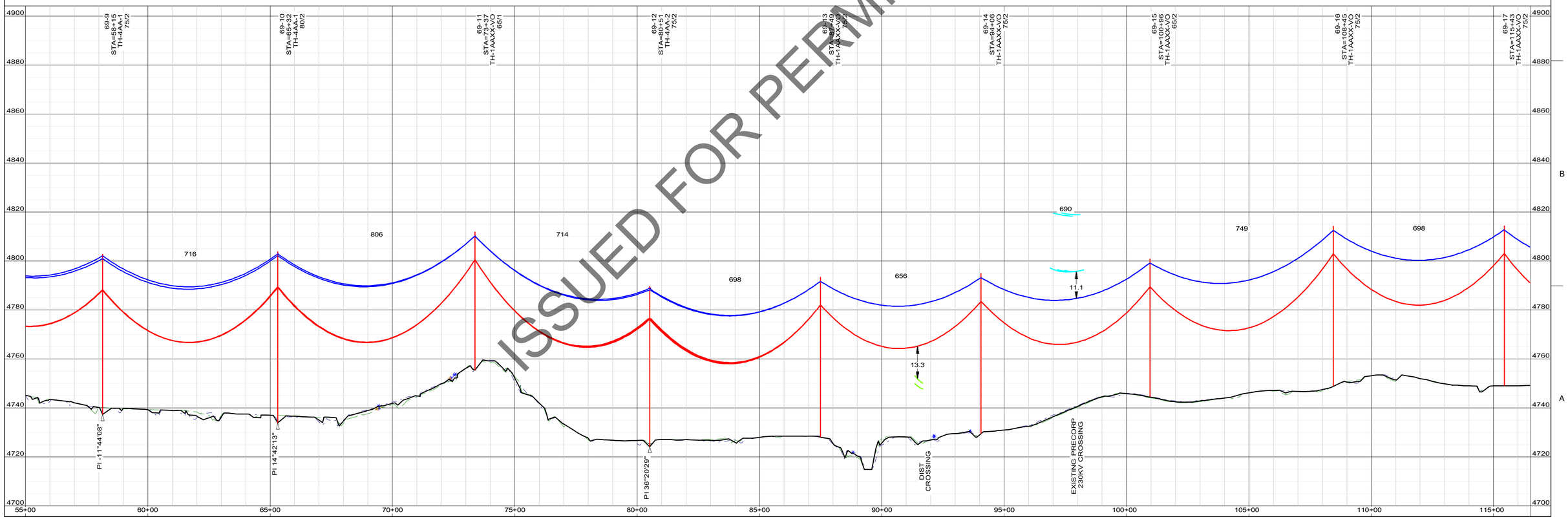
PLS-CADD DRAWIN

Exhibit 5 10014-200-CA-19



NOTES:
1) ALL STRUCTURES ARE TO BE SET AT 10% OF THE TOTAL POLE LENGTH PLUS 2FT UNLESS NOTED OTHERWISE.

69-3 - 69-30, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 703 (FT), DISPLAYED 60 DEG F INITIAL 1343 (LBS)
69-3 - 69-30, 69KV, DRAKE_ACSR.WIR, RULING SPAN 703 (FT), DISPLAYED 167 DEG F MAX SAG 3184 (LBS)



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A	4/26/2019	ISSUED FOR PERMITTING

PROJECT MANAGER	J. CARLSON
PROJECT ENGINEER	-
DESIGN ENGINEER	Z. HOLMES
CAD TECHNICIAN	Z. JANSEN
WORK ORDER	-
PROJECT NUMBER	10124612

POWDER RIVER ENERGY CORP
SUNDANCE, WYOMING

RENO - TECKLA
69 KV TRANSMISSION LINE

PLAN & PROFILES

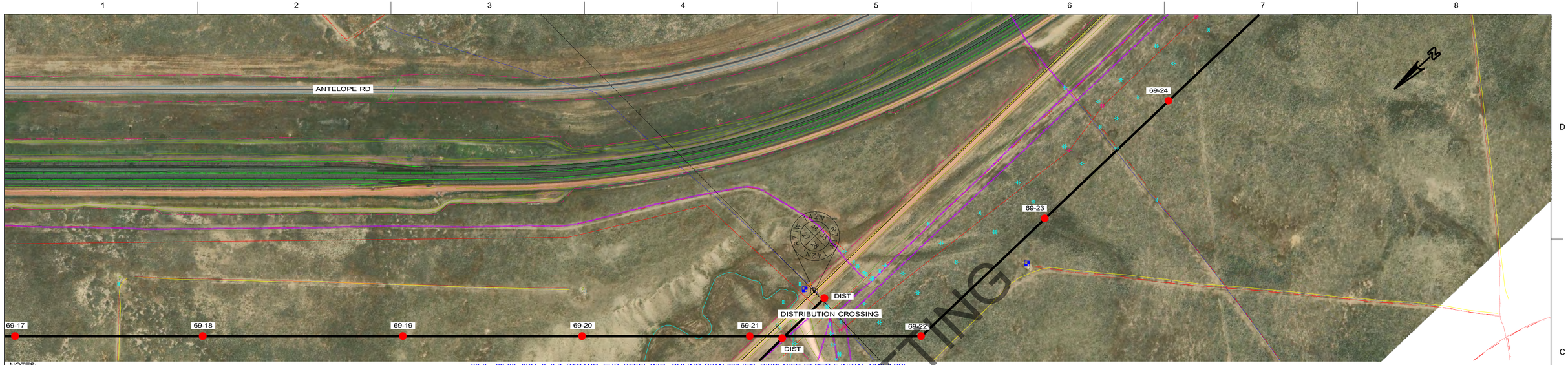
0 1" 2"

SCALE H:1"=200` V:1"=20`

SHEET
PP-2

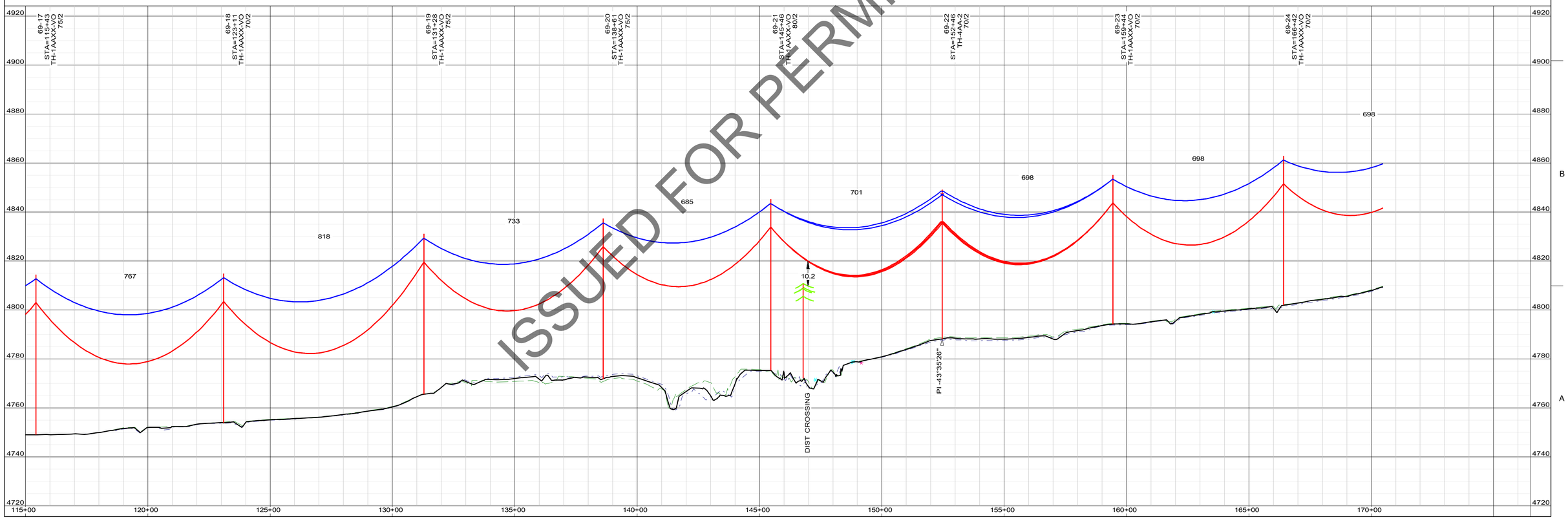
PLS-CADD DRAWING

Exhibit 5 10014-200-CA-19



NOTES:
1) ALL STRUCTURES ARE TO BE SET AT 10% OF THE TOTAL POLE LENGTH PLUS 2FT UNLESS NOTED OTHERWISE.

69-3 - 69-30, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 703 (FT), DISPLAYED 60 DEG F INITIAL 1349 (LBS)
69-3 - 69-30, 69KV, DRAKE_ACSR.WIR, RULING SPAN 703 (FT), DISPLAYED 167 DEG F MAX SAG 3184 (LBS)



ISSUE	DATE	DESCRIPTION
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A	4/26/2019	ISSUED FOR PERMITTING

PROJECT MANAGER	J. CARLSON
PROJECT ENGINEER	-
DESIGN ENGINEER	Z. HOLMES
CAD TECHNICIAN	Z. JANSEN
WORK ORDER	-
PROJECT NUMBER	10124612

POWDER RIVER ENERGY CORP
SUNDANCE, WYOMING

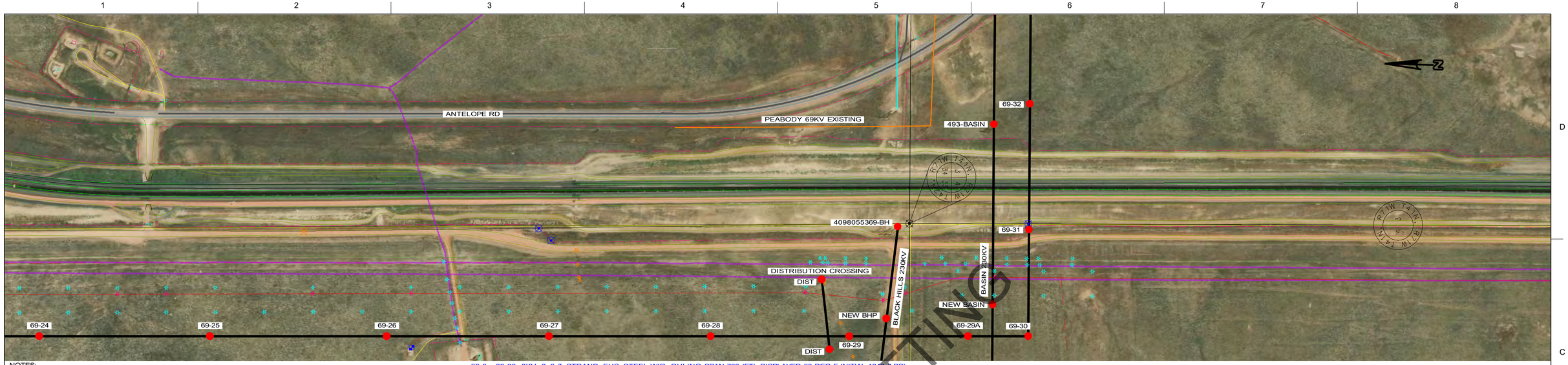
RENO - TECKLA
69 KV TRANSMISSION LINE

PLAN & PROFILES

0 1" 2"

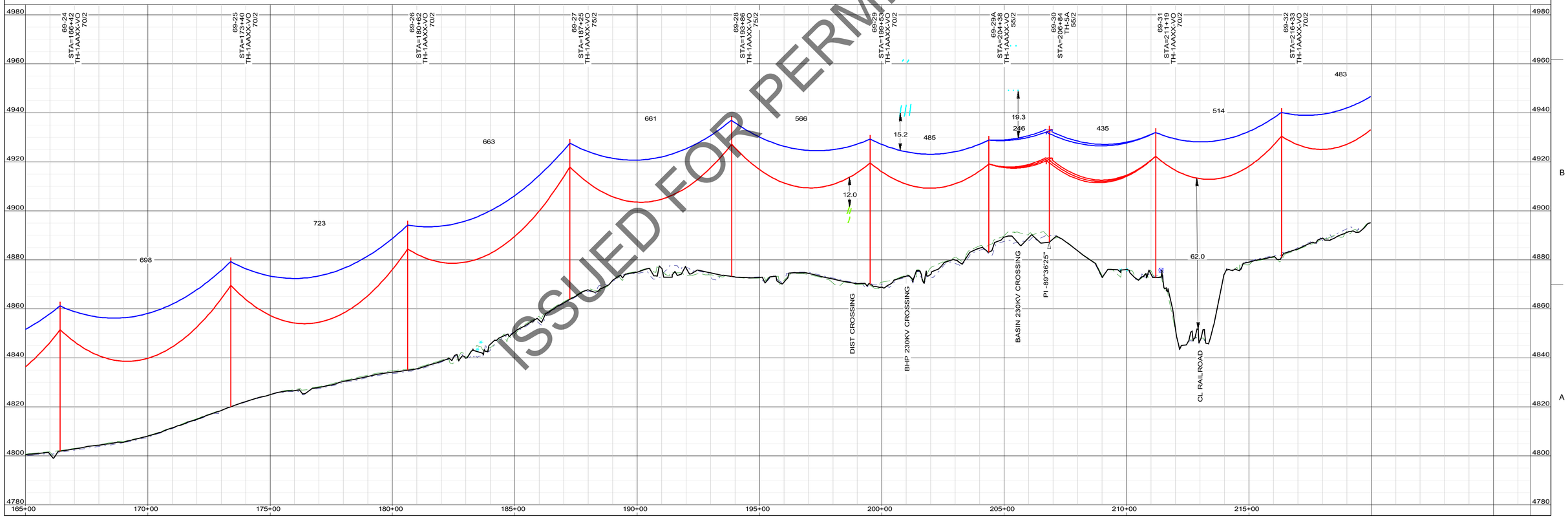
SCALE H:1"=200` V:1"=20`

SHEET PP-3



NOTES:
1) ALL STRUCTURES ARE TO BE SET AT 10% OF THE TOTAL POLE LENGTH PLUS 2FT UNLESS NOTED OTHERWISE.

69-3 - 69-30, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 703 (FT), DISPLAYED 60 DEG F INITIAL 1349 (LBS)
69-3 - 69-30, 69KV, DRAKE_ACSR.WIR, RULING SPAN 703 (FT), DISPLAYED 167 DEG F MAX SAG 3184 (LBS)
69-30 - 69-40, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 558 (FT), DISPLAYED 60 DEG F INITIAL 1223 (LBS)
69-30 - 69-40, 69KV, DRAKE_ACSR.WIR, RULING SPAN 558 (FT), DISPLAYED 167 DEG F MAX SAG 2739 (LBS)



ISSUE	DATE	DESCRIPTION
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A	4/26/2019	ISSUED FOR PERMITTING

PROJECT MANAGER	J. CARLSON
PROJECT ENGINEER	-
DESIGN ENGINEER	Z. HOLMES
CAD TECHNICIAN	Z. JANSEN
WORK ORDER	-
PROJECT NUMBER	10124612

POWDER RIVER ENERGY CORP
SUNDANCE, WYOMING

RENO - TECKLA
69 KV TRANSMISSION LINE

PLAN & PROFILES

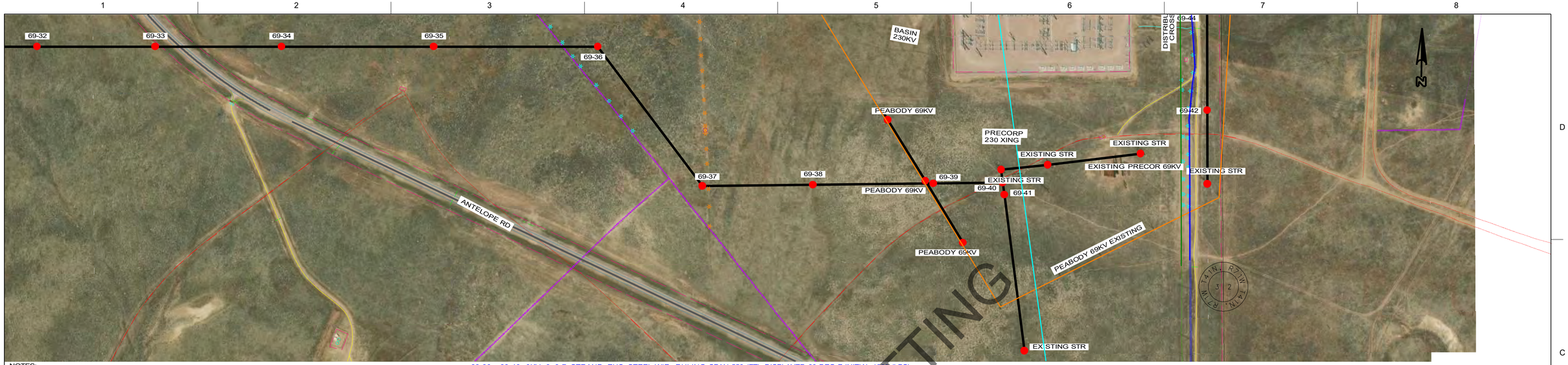
0 1" 2"

SCALE H:1"=200` V:1"=20`

SHEET PP-4

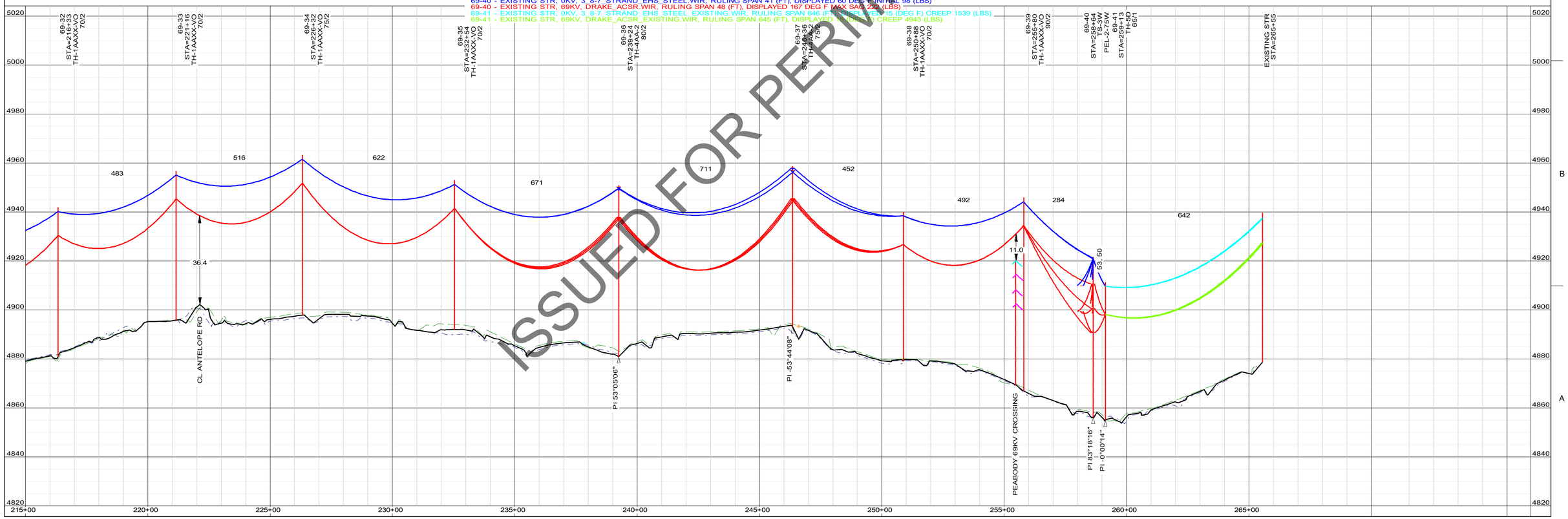
PLS-CADD DRAWING

Exhibit 5 10014-200-CA-19



NOTES:
1) ALL STRUCTURES ARE TO BE SET AT 10% OF THE TOTAL POLE LENGTH PLUS 2FT UNLESS NOTED OTHERWISE.

69-30 - 69-40, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 558 (FT), DISPLAYED 60 DEG F INITIAL 1228 (LBS)
69-30 - 69-40, 69KV, DRAKE_ACSR.WIR, RULING SPAN 558 (FT), DISPLAYED 167 DEG F MAX SAG 2739 (LBS)
69-40 - 69-41, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 49 (FT), DISPLAYED 60 DEG F INITIAL 98 (LBS)
69-40 - 69-41, 69KV, DRAKE_ACSR.WIR, RULING SPAN 44 (FT), DISPLAYED 167 DEG F MAX SAG 213 (LBS)
69-40 - EXISTING_STR, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 66 (FT), DISPLAYED 60 DEG F INITIAL 98 (LBS)
69-40 - 69-41, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 49 (FT), DISPLAYED 60 DEG F INITIAL 98 (LBS)
69-40 - EXISTING_STR, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 41 (FT), DISPLAYED 60 DEG F INITIAL 98 (LBS)
69-40 - EXISTING_STR, 69KV, DRAKE_ACSR.WIR, RULING SPAN 48 (FT), DISPLAYED 167 DEG F MAX SAG 233 (LBS)
69-41 - EXISTING_STR, 0KV, 3_8-7_STRAND_EHS_STEEL_EXISTING.WIR, RULING SPAN 646 (FT), DISPLAYED 15 (DEG F) CREEP 1539 (LBS)
69-41 - EXISTING_STR, 69KV, DRAKE_ACSR_EXISTING.WIR, RULING SPAN 645 (FT), DISPLAYED 15 (DEG F) CREEP 4943 (LBS)



ISSUE	DATE	DESCRIPTION
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A	4/26/2019	ISSUED FOR PERMITTING

PROJECT MANAGER	J. CARLSON
PROJECT ENGINEER	-
DESIGN ENGINEER	Z. HOLMES
CAD TECHNICIAN	Z. JANSEN
WORK ORDER	-
PROJECT NUMBER	10124612

POWDER RIVER ENERGY CORP
SUNDANCE, WYOMING

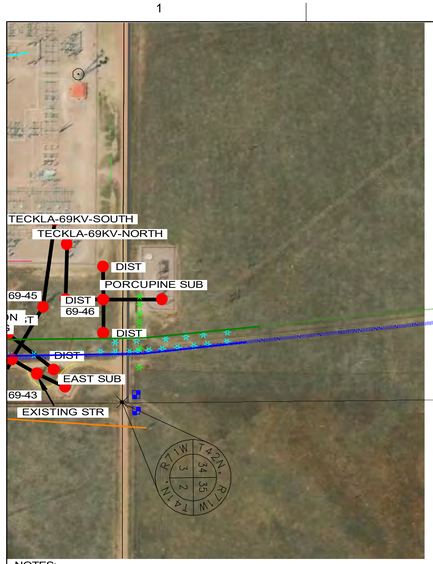
RENO - TECKLA
69 KV TRANSMISSION LINE

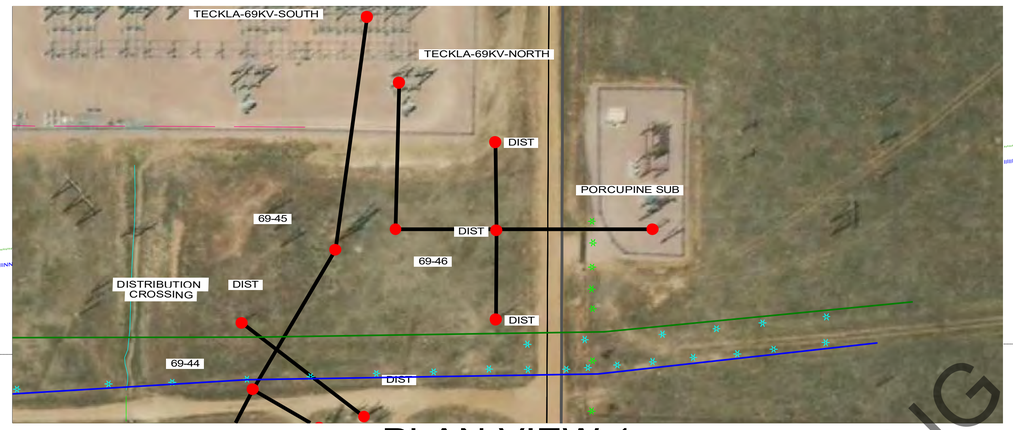
PLAN & PROFILES

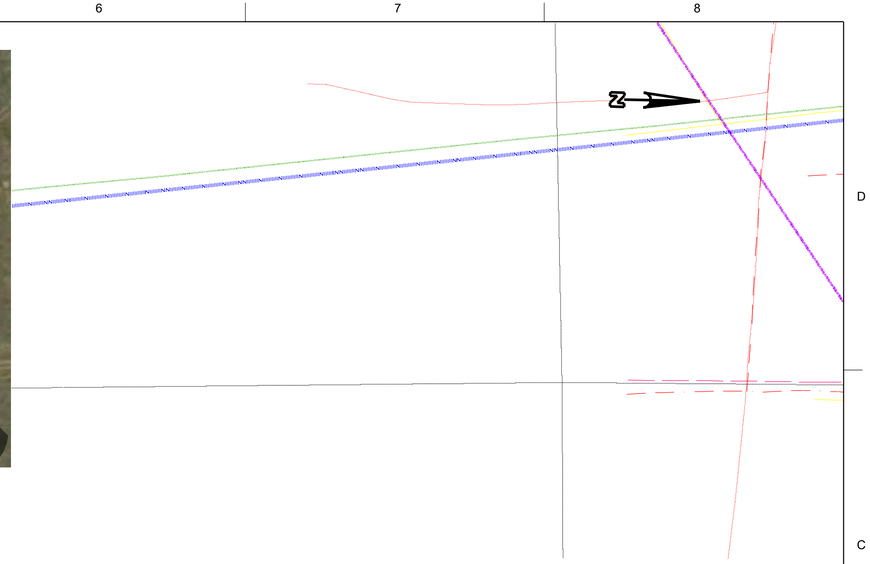
0 1" 2"

SCALE H:1"=200` V:1"=20`

SHEET PP-5







PLAN VIEW 1

NOTES:
1) ALL STRUCTURES ARE TO BE SET AT 10% OF THE TOTAL POLE LENGTH PLUS 2FT UNLESS NOTED OTHERWISE.

TECKLA-69KV-NORTH - 69-46, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 135 (FT), DISPLAYED 60 DEG F INITIAL 219 (LBS)
TECKLA-69KV-NORTH - 69-46, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 156 (FT), DISPLAYED 60 DEG F INITIAL 218 (LBS)
TECKLA-69KV-NORTH - 69-46, 69KV, DRAKE_ACSR.WIR, RULING SPAN 149 (FT), DISPLAYED 167 DEG F MAX SAG 567 (LBS)
69-46 - PORCUPINE SUB, 0KV, 3_8-7_STRAND_EHS_STEEL_EXISTING.WIR, RULING SPAN 226 (FT), DISPLAYED 60 DEG F INITIAL 876 (LBS)
69-46 - PORCUPINE SUB, 0KV, 3_8-7_STRAND_EHS_STEEL_EXISTING.WIR, RULING SPAN 276 (FT), DISPLAYED 60 DEG F INITIAL 877 (LBS)
69-46 - PORCUPINE SUB, 69KV, DRAKE_ACSR_EXISTING.WIR, RULING SPAN 252 (FT), DISPLAYED 167 DEG F MAX SAG 1504 (LBS)

ISSUE	DATE	DESCRIPTION
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
A	4/26/2019	ISSUED FOR PERMITTING

PROJECT MANAGER	J. CARLSON
PROJECT ENGINEER	-
DESIGN ENGINEER	Z. HOLMES
CAD TECHNICIAN	Z. JANSEN
WORK ORDER	-
PROJECT NUMBER	10124612

POWDER RIVER ENERGY CORP
SUNDANCE, WYOMING

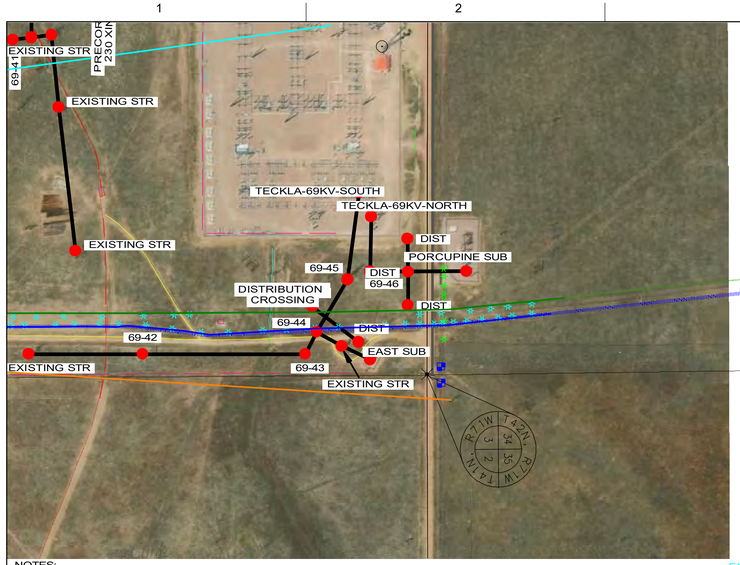
RENO - TECKLA
69 KV TRANSMISSION LINE

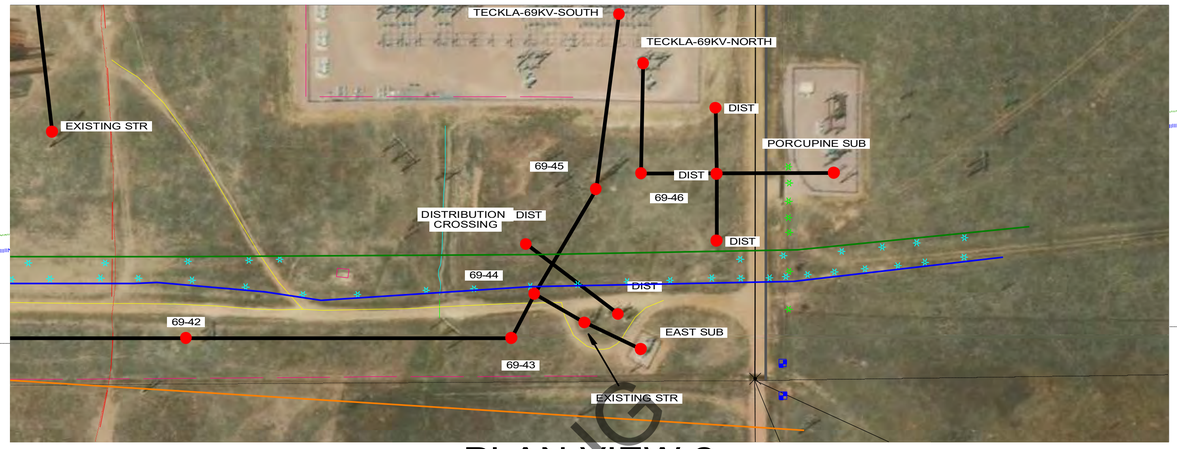
PLAN & PROFILES

0 1" 2"

SCALE H:1"=200` V:1"=20`

SHEET
PP-6





PLAN VIEW 2

NOTES:
1) ALL STRUCTURES ARE TO BE SET AT 10% OF THE TOTAL POLE LENGTH PLUS 2FT UNLESS NOTED OTHERWISE.

EXISTING STR - 69-42, 0KV, 3_8-7_STRAND_EHS_STEEL_EXISTING.WIR, RULING SPAN 309 (FT), DISPLAYED 15 (DEG F) CREEP 628 (LBS)
EXISTING STR - 69-42, 0KV, 3_8-7_STRAND_EHS_STEEL_EXISTING.WIR, RULING SPAN 283 (FT), DISPLAYED 15 (DEG F) CREEP 658 (LBS)
EXISTING STR - 69-42, 69KV, DRAKE_ACSR.EXISTING.WIR, RULING SPAN 296 (FT), DISPLAYED 15 (DEG F) CREEP 3908 (LBS)
69-42 - 69-43, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 421 (FT), DISPLAYED 60 DEG F INITIAL 1105 (LBS)
69-42 - 69-43, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 437 (FT), DISPLAYED 60 DEG F INITIAL 1104 (LBS)
69-42 - 69-43, 69KV, DRAKE_ACSR.WIR, RULING SPAN 429 (FT), DISPLAYED 167 DEG F MAX SAG 2281 (LBS)
69-43 - 69-44, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 56 (FT), DISPLAYED 60 DEG F INITIAL 159 (LBS)
69-43 - 69-44, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 73 (FT), DISPLAYED 60 DEG F INITIAL 158 (LBS)
69-43 - 69-44, 69KV, DRAKE_ACSR.WIR, RULING SPAN 59 (FT), DISPLAYED 167 DEG F MAX SAG 369 (LBS)
69-44 - EXISTING STR, 0KV, 3_8-7_STRAND_EHS_STEEL_EXISTING.WIR, RULING SPAN 73 (FT), DISPLAYED 15 (DEG F) CREEP 1295 (LBS)
69-44 - EXISTING STR, 0KV, 3_8-7_STRAND_EHS_STEEL_EXISTING.WIR, RULING SPAN 74 (FT), DISPLAYED 15 (DEG F) CREEP 972 (LBS)
69-44 - TECKLA-69KV-SOUTH, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 210 (FT), DISPLAYED 60 DEG F INITIAL 225 (LBS)
69-44 - TECKLA-69KV-SOUTH, 69KV, DRAKE_ACSR.WIR, RULING SPAN 202 (FT), DISPLAYED 167 DEG F MAX SAG 630 (LBS)
69-44 - EXISTING STR, 69KV, DRAKE_ACSR.EXISTING.WIR, RULING SPAN 66 (FT), DISPLAYED 15 (DEG F) CREEP 3957 (LBS)
69-44 - TECKLA-69KV-SOUTH, 0KV, 3_8-7_STRAND_EHS_STEEL.WIR, RULING SPAN 201 (FT), DISPLAYED 60 DEG F INITIAL 225 (LBS)

ISSUE	DATE	DESCRIPTION
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
-	-	-
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POWDER RIVER ENERGY CORP
SUNDANCE, WYOMING

RENO - TECKLA
69 KV TRANSMISSION LINE

PLAN & PROFILES

0 1" 2"
SCALE H:1"=200` V:1"=20`

SHEET
PP-7

POWDER RIVER ENERGY CORPORATION
PEABODY 69kV REROUTE
CULTURAL RESOURCE INVENTORY REPORT
CAMPBELL COUNTY, WYOMING
Task Order No. 2019-ANT-002
Work Order: 180333

Prepared for

Powder River Energy Corporation
P.O. Box 930
Sundance, Wyoming 82729

Date: May 23, 2018

ANTIQUUS

CULTURAL RESOURCE CONSULTING

For official use only: Disclosure of site locations is prohibited under 43CFR 7.18

PROJECT DESCRIPTION

At the request of Powder River Energy Corporation (PRECorp), Antiquus conducted a Class III inventory for two overhead power line rights-of-way (ROWs). PRECorp plans to relocate an existing 69kV line west to accommodate coal mining on Peabody's North Antelope/ Rochelle mine. The study area is located on Wyoming State Trust and private land in south central Campbell County, Wyoming. The ROWs cross parts of Sections 14, 15, 22, 27, 28 and 33 of T42N R71W and Section 3 T41N R71W. In total, the ROWs are approximately 6.3 miles (10 kilometers [km]) long (**Figure 1**). Of this, 1.87 miles (3 km) of ROW in Section 28 42N R71W was not inventoried because PRECorp could not obtain the landowner's permission to conduct a cultural resource inventory of their property. In total, 4.43 miles (7.13km) was inventoried for cultural resources. Coordinate locations in NAD 1983 of the ROWs are provided in Appendix 1. A 100-foot ROW encompassing about 54 acres was inventoried for cultural resources. No cultural resources were found

The area of potential effects (APE) is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist. The APE is influenced by the geographic area, the scale and nature of the undertaking, and the effects (physical, visual, auditory, atmospheric). In defining the APE of the current undertaking, one must consider the direct physical effects and visual effects. All the significant sites in the sections crossed by the ROWs have been mitigated to address adverse effects to these properties. The visual APE of these properties has been impacted by various infrastructure developments including; the Matheson road, a rail line, coal bed methane wells, overhead power lines, numerous gas and oil pipelines, oil wells and reservoir construction. The ROWs comprise about 76 acres. Assuming a working ROW of 60 feet, about 45.8 acres will be lightly disturbed by overland travel associated with the construction of the line. Impacts will be limited to the movement of trucks for field crews and the movement of medium-weight machinery used to install poles, install hardware on the poles, and layout and string the phase lines.

Recognizing that the APE is dynamic, the federal agency, in consultation with the State Historic Preservation Office (SHPO) will establish the final APE. If Traditional Cultural Property (TCP) areas are discovered, socio-cultural effects are re-considered, effects on culturally sensitive natural resources emerge, or indirect or secondary effects (erosion, public use) are determined. Determination of the APE is based on the best information available about proposed impacts associated with continued long-term maintenance of the power line, and the best available data for archaeological and historic property locations at the time of the writing of this report

The study area is approximately 12 miles southeast of Wright, Wyoming and can be found on the Teckla (1971) and Teckla Southwest (1971). Antiquus holds a permit from the state of Wyoming (expires April 27, 2020) to conduct cultural resource inventories on state trust lands. Gregory S. Newberry served as Principal Investigator. Mr. Newberry conducted the fieldwork over two days beginning on May 15, 2018.

Typical topography and vegetation
Looking northeast long ROW from southwest corner of Section 27 T42N R71W
Greg Newberry 5/16/19 Unaltered photo

Figure 2

ENVIRONMENTAL SETTING

The study areas encompass parts of the Gray Creek and Porcupine Creek drainages as well as the uplands flanking these drainages. Topographic relief is low. The underlying bedrock is the Eocene age Wasatch Formation. The formation consists of alluvial mudstone and sandstone. In most places mudstone of overbank flood plain origin predominates and makes up about two thirds of the unit. Cross bedded sandstone that becomes finer grained upwards is interpreted as channel deposits of meandering to anastomosed streams and makes up much of the remainder of the unit. Minor constituents include coarse conglomerate the Moncrief and Kingsbury Members of the Wasatch Formation deposited in alluvial fans along the western margin of the basin and carbonaceous shales and thick coal beds deposited in extensive long-lived low-lying swamps.

Sediments on the ridges are colluvial, or residual in origin and consist of shallow to moderately deep sandy silts that range in color from light brown to brown. Deep, light brown to yellowish brown alluviums are present on the floodplains and terraces of Gray and Porcupine Creeks.
Both Gray and Porcupine Creek are moderately sinuous. Their floodplains are relatively narrow, and they are moderately incised within their channels. Stream flow is either southeast or south. Terrace development is minimal along Gray Creek, but well-developed terraces are associated with Porcupine Creek. Vegetation consist of a

sagebrush steppe composed of a variety of short grasses, plains prickly pear cactus, forbs and wildflowers. The study area is used to pasture livestock. Elevations range from 4,700 feet to 4,815 feet above sea level.

The built environment consists of fence lines, two track roads, numerous overhead powerlines, a rail line, a reservoir, coal bed methane wells, the Matheson road and numerous gas and oil pipelines.

BACKGROUND RESEARCH

A files search (# 208 20190521) were conducted through the Wyoming State Historic Preservation Office (SHPO) and revealed approximately 38 previous inventories in the sections crossed by the ROWs. Only five of these postdates 2009 and are therefore considered valid. These postdating 2009 are listed in Table 1. The information in Table 1 is incomplete because the WYOTrack system failed to download the complete list of previous work in the sections crossed by the ROWS. The information on the number of previous inventories and some of the information in the table was extracted from the attribute tables associated with the appropriate shape files and the WYOTrack map.

Table 1. Previous Cultural Resource Inventories Conducted in the Project Area

SHPO #	Consultant	Company	Type of Inventory
12-233-0	Unknown	Unknown	Oil wells ?
14-344-0	Unknown	Unknown	Seismic lines
WY 2014 684	Western Archaeological Services	Charger Resources LLC	Oil well and access
WY 2014 685	Western Archaeological Services	Charger Resources LLC	Oil well and access
WY 2018 309	Unknown	Anschult Corporation	Oil well and access

Twenty-nine sites have been reported in the sections crossed by the ROWs. Twenty-seven are prehistoric, one is historic, and one is listed as unknown. Five of these; 48CA3218, 48CA1420/3219, 48CA3606, 48CA3607 and 48CA3612 are considered significant (see **Figure 1**). All are prehistoric habitations located on terraces of Porcupine Creek. Geomagnetic surveys and excavations were conducted by GCM Services in 2006 at all of these properties. This work served to mitigate any adverse effects to the sites and no further work was considered necessary. However, GMC Services did recommend that if, in the future, geophysical remote sensing improved that the sites should be resurveyed to search for any deeply buried cultural components.

An examination of the GLO plats of T42N R71W and 41N R71Wdid not reveal the presence of any historic properties or features within the APE at the time when the township was initially surveyed.

METHODS

The proposed ROWs are shown as solid black lines on the project map (Figure 1). The dotted line represent that part of the ROWs that were not inventoried The ROWs were

inventoried using two sinuous transects, with each transect extending 50 feet off the staked center line. Ground visibility was generally poor (<40%) (Figure 3). In areas of lower ground visibility, the walking pace was deliberately slowed, and an effort was made to examine areas where visibility was highest. These included areas of deflation, the crests and upper slopes of ridges, rodent back dirt, cattle trails, and game trails. Weather on the days of the inventory was fair. Air temperature ranged from the low 50's on to the low 40's. Wind on both days was moderate and from the southeast. The sky was partially cloudy to overcast. Approximately 54 acres were inventoried for cultural resources.

Typical Ground Visibility. G. Newberry 5-16-19 Unaltered photograph
Figure 3

RESULTS

The ROWs cross 48CA1420/3219. No cultural materials associated with this site were found in the ROWs. No cultural properties were found by this study.

SUMMARY AND RECOMMENDATIONS

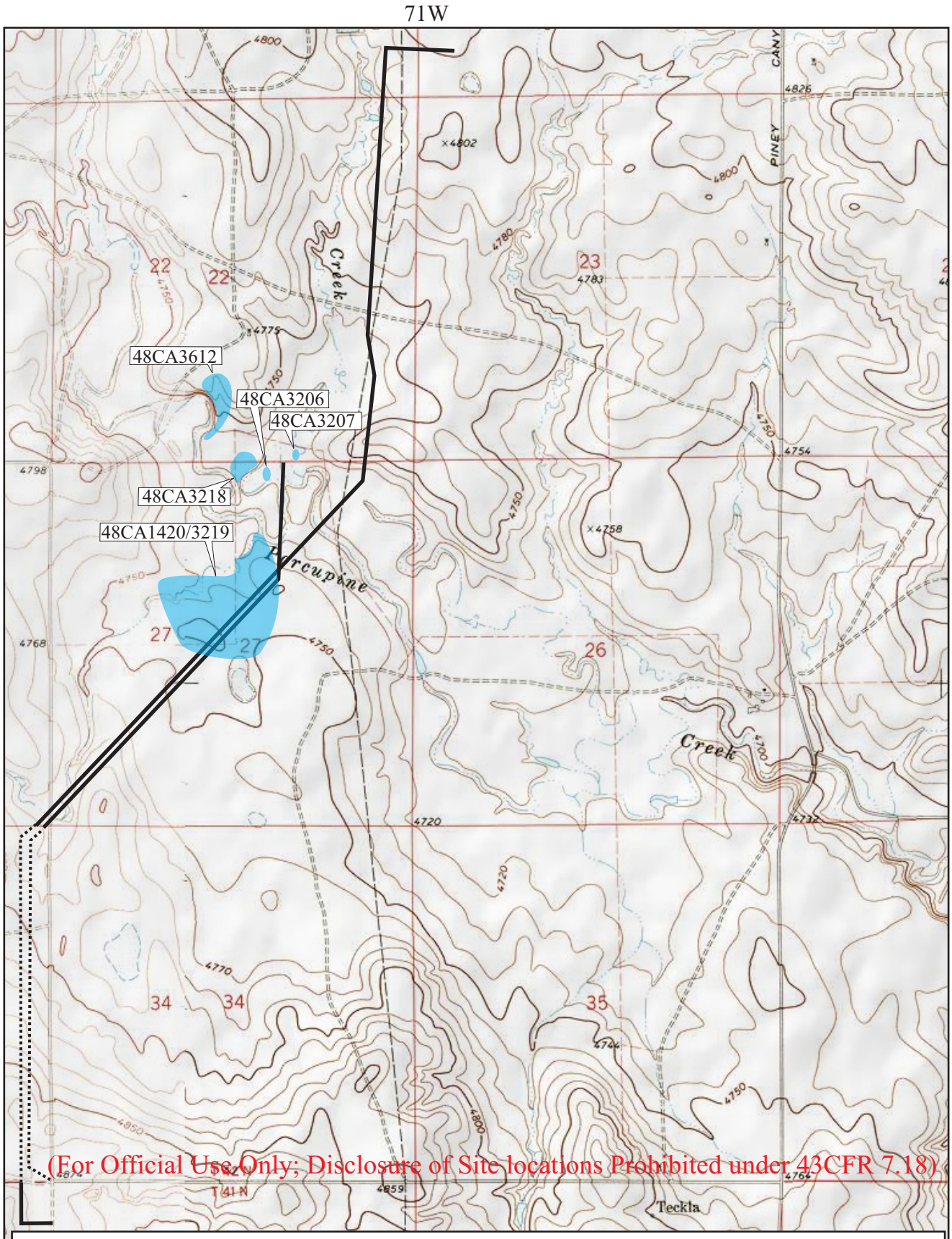
Previous work in the sections crossed by the ROWs suggests a relatively high potential for significant cultural properties on the terraces of Porcupine Creek. However, this area has been inventoried on at least three different occasions. As a result of this work the

potential for discovering a previously unreported property is considered very low. No buried A horizons were observed in the cut banks or terraces associated with Gray or Porcupine Creek. An examination of the terraces associated with Porcupine Creek did not reveal any evidence of buried cultural materials . Antiquus is confident that the results of this inventory are accurate.

Appendix 1

New Lines Universal Transverse Mercator Coordinates (North American Datum 83)

DESC.	Northing	Easting	Northing	Easting
Begin long segment	4828472	470900		
PI	4828488	470607		
PI	4827208	470493		
PI	4826986	470531		
PI	4826535	470460		
Begin skip	4824956	468943		
End skip	4823458	468940		
PI	4823309	468937		
End long segment	4823303	469078		
Begin short segment	4826638	470123		
PI	4826117	470099		
End south segment	4824946	468976		



Powder River Energy Corporation Peabody 69kV Reroute

Scale:

0 ¼ ½ ¾ 1 Mile

1: 24000

Legend:

Inventoried ROW

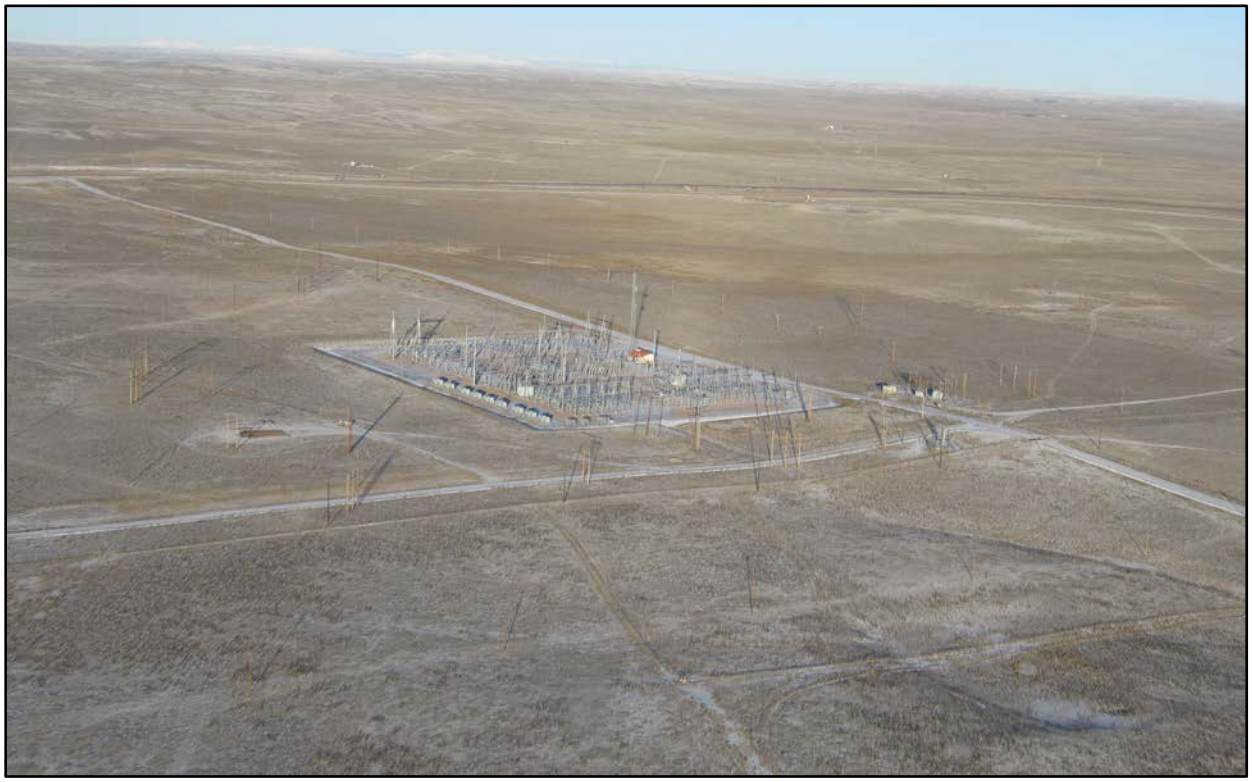
Known eligible site

Figure 1

POWDER RIVER ENERGY CORPORATION

CLEARANCE SURVEY FOR THREATENED & ENDANGERED SPECIES, AND OTHER WILDLIFE SPECIES OF CONCERN

Peabody 69 kV Reroute
(CWP 2017-20 WO# 180333)



Submitted to:

Powder River Energy Corporation
P.O. Box 930
Sundance, WY 82729

Prepared by:

Great Plains Wildlife Consulting, Inc.
70 Upper Prairie Dog Road
Banner, WY 82832

April 2019

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TABLES AND FIGURES

BACKGROUND AND INTRODUCTION

Powder River Energy Corporation (PRECorp) intends to move an existing 69 kV High-Voltage Distribution (HVD) overhead power line to a new location spanning private, State of Wyoming (State), and U.S. Forest Service (USFS) lands in Campbell County, Wyoming (see *Project Description*, below). The proposed project is referred to as the Peabody 69 kV Reroute and is located approximately 12.2 miles southeast of the town of Wright. Construction is anticipated to begin in May 2019 and to be completed by the end of December 2019.

Federal funds are to be used to finance this project; therefore, the U.S. Fish and Wildlife Service (Service) requires surveys for vertebrate species of concern and their habitats prior to initiating construction activities. Wildlife species of concern include: those protected under the Endangered Species Act (ESA) or listed as candidate, proposed, or petitioned for listing under the ESA; raptors; other avian species listed on the Service's (2008) Birds of Conservation Concern (BCC) List; and species listed by the Wyoming Game and Fish Department (WGFD 2016a) as Species of Greatest Conservation Need (SGCN). Conducting such surveys also is in keeping with Executive Order 13186 (66 Federal Register [FR] 3853; January 17, 2001), which directs Federal executive departments and agencies taking actions that have, or are likely to have, a measurable negative impact on migratory bird populations to develop and implement Memoranda of Understanding with the Service that promote the conservation of populations of species of special interest and the habitats upon which they depend.

Information and data available from the Service, WGFD, and Bureau of Land Management (BLM) were compiled and used to supplement field surveys for vertebrate species of concern and their habitats conducted by Great Plains Wildlife Consulting, Inc. (GPWC). In addition to existing agency data, Peabody Energy's North Antelope Rochelle Mine (NARM) collaborated with GPWC by sharing long-term wildlife data collected in areas of overlap between the Peabody 69kV Reroute project and NARM's annual wildlife monitoring area. General habitat assessments for threatened and endangered (T&E) plant species also were performed during the wildlife clearance surveys. Survey results and compiled information for this project are summarized and included in this report.

PROJECT DESCRIPTION

A detailed description of the Peabody 69kV Reroute project was provided in PRECorp's full application package submitted for this project. The project will span portions of Sections 3-4, Township (T) 41 North (N): Range (R) 71 West (W), and Sections 14-15, 22-23, 26-28, and 33-34, T42N:R71W (Figure 1).

The project will entail rerouting approximately 3.11 miles of 69kV HVD overhead power line to an existing utility corridor located approximately 0.14 to 1.0 mile west of the line's current alignment (Figure 1). The new 69kV HVD overhead power line will be approximately 4.78 miles long, and will have similar H-frame construction as the existing 69kV line. Following construction of the new power line, the existing 69 kV power line will be retired (removed), for a net increase of approximately 1.67 miles of overhead power line in the project area. In addition to its alignment within an existing overhead power line corridor, the majority of the new overhead power line also will be parallel to one or more county roads, as well as a railroad heavily used by local coal mines (Figure 2).

The new power line ROW will be approximately 100 feet wide (50 feet on either side of the centerline). The construction design will consist of wooden poles in a standard H-frame configuration used for 69kV HVD overhead power lines. Pole and hardware designs will meet or exceed current guidelines and recommendations outlined by the Avian Power Line Interaction Committee (APLIC 2006, 2012). Those standards are preferred by the Service to minimize the potential for avian electrocutions and collisions, respectively.

Equipment and vehicular access to the project area will be confined to existing roads and the project's ROW corridors. Where existing roads do not provide adequate access, vehicles will travel along the most direct route to minimize surface disturbance. No new road construction will occur. Furthermore, PRECorp does not permit project related vehicles or equipment operations on water-saturated ground or unpaved roads in the ROWs for safety purposes and to minimize surface damage due to the creation of rutted roads.

Project activities will occur on private, State, and USFS surfaces in a mixed sagebrush-grassland mosaic. Short-term surface disturbance will occur during power line construction and removal, and will consist primarily of overland travel along existing roads and two-tracks, and within the project ROWs. Long-term disturbance will be limited to the area around each new pole base plus occasional overland travel within the ROWs to maintain and service the new line.

As indicated, vegetation will typically be impacted within only a 3-foot diameter area at each pole site during the auguring process to set or remove poles. Most of that disturbance will consist of dirt overlay from auguring rather than actual vegetation removal. Short-term surface disturbance will impact approximately 95.5 linear, non-contiguous acres within the ROWs during construction and removal of the power lines. Long-term surface disturbance will affect a maximum of approximately 8.7 non-contiguous acres in the new ROW (Table 1).

Construction is currently anticipated to begin in May 2019 and conclude at the end of December. The construction process consists of a series of brief (approximately 6-8 hours, total) disturbances at each pole location as crews drive along the ROW corridors to distribute materials, frame structures, set poles, string the new lines, and remove the existing power lines.

SURVEY AREA

The Peabody 69 kV Reroute project is located approximately 12.2 to 15.2 miles southeast of Wright, Wyoming, depending on the portion of the project. The new power line ROW will cross the paved Antelope County Road and run nearly parallel to portions of that paved road, as well as the gravel Matheson County Road and the railroad (Figure 2). The wildlife survey area for the project encompasses approximately 13.4 square miles (mi^2) and includes the proposed and retired ROWs and a surrounding 1.0-mile perimeter (Figure 1). That area encompasses all or portions of: Sections 2-5 and 9-11, T41N:R71W and Sections 10-11, 13-16, 21-29, and 32-35, T42N:R71W. Surface access was available throughout most of the wildlife survey area for this project. In areas where confirmation of access was not directly received, data from previously approved wildlife surveys in the project area or data provided by NARM were used.

The wildlife survey area lies in the west-central portion of the USFS Thunder Basin National Grassland. Elevations range from approximately 4,700 feet to 4,961 feet above sea level, with the lowest elevations in the central portion of the wildlife survey area along Porcupine Creek. The topography in the survey area ranges from relatively flat to gently rolling, with the majority of lands comprised of sagebrush-grassland or grassland habitats.

The Wright area averages approximately 14 inches of precipitation and 57 inches of snow annually (Western Regional Climate Center, no date [n.d.]). Precipitation is typically greatest from April through June; snowfall is greatest from March through April. The 25-year (1991-

2016) average minimum and maximum temperatures are 12.7 and 85.8 degrees Fahrenheit, respectively. Average monthly temperatures are generally lowest in January and highest in July.

The Peabody 69kV Reroute wildlife survey area is comprised of mixed habitats with approximately 68% sagebrush, 28% grassland, 2% disturbance, 1% wetlands, and less than 1% other (e.g., introduced upland vegetation [shrubs] and riparian). As indicated, the area is dominated by shrublands and upland grasslands. Shrubland communities comprised largely of Wyoming big sagebrush (*Artemisia tridentata wyomingensis*) are present throughout the area. Grasslands are found scattered throughout the wildlife survey area, particularly in Section 2, T41N:R71W. Grasses observed in the wildlife survey area included crested wheatgrass (*Agropyron cristatum*) and blue grama (*Bouteloua gracilis*).

All or a portion of six black-tailed prairie dog (*Cynomys ludovicianus*) colonies occur within or overlap the wildlife survey area (Figure 1). Three (combined total of approximately 33 non-contiguous acres) of the six colonies were occupied during surveys conducted from January through April 2019, with the remaining three colonies (combined total of approximately 39 non-contiguous acres) unoccupied. Active colonies ranged in size from 0.8 to 22.5 acres. Few forbs are present in the wildlife survey area; they consist of both native and introduced species. Herbaceous cover varies considerably depending on the density of the vegetation, land use, and terrain (i.e., slope).

Shrubland habitats are common throughout the wildlife survey area, with sparse to moderately dense sagebrush stands in some areas. Shrub height ranges from 6 to 24 inches in most areas. Grass cover in the area ranges from relatively short and sparse to tall and dense; bare ground comprises less than 10% of the area. Grass height ranges from approximately 6 to 24 inches throughout the area. Grass cover is shortest in the active prairie dog colonies, with the tallest grass stands occurring along the drainages. Disturbed areas are present in localized areas, particularly in the southeastern portion of the wildlife survey area where active surface coal mining is occurring.

The entire wildlife survey area is drained by Porcupine Creek, which flows from northwest to southeast through the central portion of the wildlife survey area (Figure 1). Gray Creek, a major tributary of Porcupine Creek, flows from north to south in the northern part of the survey area. Several unnamed drainages also occur throughout the area. All drainages are

intermittent or ephemeral; both Porcupine Creek and Gray Creek contained water during the early April 2019 field survey conducted for the Peabody 69kV Reroute project.

Multiple man-made impoundments are present throughout the wildlife survey area, with most containing water during surveys conducted from January through early April 2019. A few of the small reservoirs have adjacent areas of wetland habitats.

Current land uses within the wildlife survey area include livestock grazing and energy development (i.e., coal mining and oil and gas). The area has been heavily impacted by infrastructure (i.e., roads, overhead power lines, electrical substations) supporting these energy extraction activities (Figure 2). The wildlife survey area is bisected from north to south by the railroad, with the paved Antelope County Road, gravel Matheson County Road, and additional gravel and two-track roads transecting the area.

METHODS

The entire Peabody 69 kV Reroute project and its associated wildlife survey area both are located within the NARM permit area. Wildlife surveys at NARM have been conducted from the early 1980s through 2019, resulting in an extensive wildlife database for the project area.

Prior to initiating the clearance surveys, PRECorp provided GPWC with the spatial files of the project footprint. Maps were then generated and known wildlife information was compiled for the wildlife survey area after reviewing NARM, Service, BLM, and WGFD records of known and potential wildlife occurrences in the area. The Service's interactive Information Planning and Conservation System (IPaC) also was accessed during this preparation. This web-based system allows project proponents to access a list of potentially affected species of concern within the project area to help avoid, minimize, and mitigate impacts that may result from project activities. The IPaC report (Service 2019) for the Peabody 69 kV Reroute wildlife survey area includes all listed T&E species and candidate species for ESA listing. In addition, the Service (2008) BCC List was reviewed for species likely to occur in the project area. The BCC List is divided into 37 Bird Conservation Region (BCR) lists for ecologically distinct regions of North America that host specific bird communities, habitats, and resource management issues. All of northeastern Wyoming, including the Peabody 69 kV Reroute wildlife survey area, lies within the designated area for the BCR 17 (Badlands and Prairies) list.

GPWC biologists (see Qualifications) conducted wildlife clearance surveys from early January through early April 2019 to document the presence or absence of various vertebrate species or wildlife features of interest such as federally listed species, bald eagle (*Haliaeetus leucocephalus*) winter roosts, greater sage-grouse (*Centrocercus urophasianus*) (hereafter, sage-grouse) leks, raptor nests, black-tailed prairie dog colonies, and other species of management concern within the wildlife survey area. Ground surveys to search for bald eagle winter roosts were conducted following current Service recommendations, which call for following current BLM survey protocols (BLM 2017a). Bald eagle winter roost surveys in winter 2018/2019 were conducted on January 9, January 30, and February 18, 2019. Search efforts encompassed the wildlife survey area and were conducted from 30 minutes before sunrise to 1 hour after sunrise or from 1 hour before sunset to 30 minutes after sunset. A biologist conducted the surveys by slowly driving through the area and used binoculars and/or a spotting scope to spot perched bald eagles and prey or carcasses that might attract them. All potential roosting habitats within the wildlife survey area was examined.

One search for sage-grouse leks was conducted in appropriate habitats within the wildlife survey area on March 28, 2019. The search began 30 minutes before sunrise and continued until 1 hour after sunrise (WGFD 2012a). Biologists searched for displaying grouse while slowly driving through the area, concentrating efforts in suitable lek habitat (level to rolling sagebrush-grassland). Frequent stops were also made at vantage points to scan and listen for strutting birds.

Surveys for nesting raptors were conducted throughout the wildlife survey area on March 28 and April 8, 2019. All previously identified nest sites (intact and former) were checked from vantage points using binoculars and a spotting scope to determine whether or not raptors were occupying them. Biologists also watched for new nests while traveling through the area. During all field work, guidelines recommended by Rosenfield et al. (2007) were followed to prevent nest abandonment and injury to eggs or young.

During all surveys, biologists also conducted a general assessment to identify any unique or high-value habitats that could support federally listed species (including T&E plant species) or other species of concern. New prairie dog colonies or known changes in previously identified colony boundaries were mapped by walking the outer perimeter of intact burrows and automatically recording waypoints at 10-meter intervals using a hand-held Global Positioning System (GPS) receiver. All wildlife features and species observed during the surveys were

recorded, including notes on the species, number of individuals, sex and age (if possible), habitat, activity, and location (Universal Transverse Mercator North American Datum 1983, Zone 13 North). Broad habitat descriptions throughout the wildlife survey area also were recorded.

RESULTS

Federally Listed Species

The northern long-eared bat (*Myotis septentrionalis*; threatened) and Ute ladies'-tresses (*Spiranthes diluvialis*; threatened) were the only species associated with the ESA listing process identified for the Peabody 69kV Reroute project through the Service's (2019) IPaC report generated for the proposed project. This includes federally listed T&E, candidate, proposed, or petitioned species. No critical habitats for any federally listed species have been designated by the Service (2019) in the wildlife survey area.

No northern long-eared bat populations are known to occur within the Peabody 69kV Reroute wildlife survey area; no long-eared bat populations have been documented within Campbell County. The closest known occurrence of this species occurs in dense woodland habitats in Crook County near Sundance, Wyoming (ICF 2013). No substantial woodlands are located in the wildlife survey area and prominent rocky features are limited throughout the area. Vegetation communities in the wildlife survey area are dominated by sagebrush-grassland habitats, and no known underground cavities or caves exist in the area. Numerous small water bodies (creeks and impoundments) and moist drainages, which represent potential foraging habitat where insects tend to concentrate, are present in the area. Based on recent findings related to the occurrence of white-nose syndrome, the Service's 4(d) Rule and its allowed exceptions do not apply to activities associated with this project. However, no disturbance of potential bat roosting habitat (e.g., woodlands and underground features such as caves and adits) are expected for this project. The closest confirmed occurrence of white-nose syndrome occurs at least 65 miles east of the Peabody 69 kV Reroute project in Custer County, South Dakota and the closest known suspected occurrence of white-nose syndrome is located at least 74 miles to the southeast in Goshen County, Wyoming (White-Nose Syndrome Response Team 2018).

No populations of Ute ladies'-tresses are known to exist within the Peabody 69 kV Reroute wildlife survey area or elsewhere in Campbell County. The closest known population of

this orchid is located along a tributary of Antelope Creek in northwestern Converse County, at least 4 miles from the project site (Heidel 2007). Bottomland habitats and primary drainages within the wildlife survey area may have some potential to support Ute ladies'-tresses, though soil conditions and vegetation cover in much of the area are not typical of suitable habitat for this species. Furthermore, the proposed project will not disturb any drainages or bottomland habitats within the wildlife survey area that could serve as potential habitat for Ute ladies'-tresses.

Raptors

All raptor species are protected under the Migratory Bird Treaty Act (MBTA) (Service n.d.-a); eagles receive additional protection under the Bald and Golden Eagle Protection Act (Service n.d.-b). These laws afford special protections for raptors by safeguarding individuals as well as nests, eggs, and young.

Based on raptor nest data obtained prior to the clearance surveys, 27 raptor nest locations have been identified within the wildlife survey area (Figure 1, Table 2). No new nests were found during the March 28 and April 8, 2019 clearance surveys and no obvious pairs of nesting raptors were seen. Only 8 of the 27 known raptor nest sites were physically intact as of April 8, 2019, though the nesting material itself is no longer present on one platform structure. All eight nest sites were unoccupied during the March and April 2019 surveys. Nests within the wildlife survey area are found in and on a variety of substrates, including prairie dog burrows, tree windbreaks, artificial nesting platforms, creek banks, and power poles (H-frame and distribution poles).

Raptors seen in the wildlife survey area during surveys conducted from January through April 2019 included golden eagles (*Aquila chrysaetos*) and red-tailed hawks (*Buteo jamaicensis*). On January 9, 2019, three golden eagles were observed perched on different H-frame power poles in sagebrush-grassland; one each in NWSE Section 27 and SESE Section 32, T42N:R71W, and one in NESE Section 3, T41N:R71W. On January 30, one golden eagle was seen perched on a standard distribution power pole in grassland in SWSW Section 34, T42N:R71W. On that same date, three additional golden eagles were observed perched on H-frame power poles in eastern Section 34, T42N:R71W. Two red-tailed hawks were seen in NWNE Section 34, T42N:R71W during surveys conducted in early April 2019.

No intact raptor nests will be physically impacted by the Peabody 69 kV Reroute project (Figure 1). The eight intact nest sites range from less than 0.1 mile to approximately 0.7 mile to the ROW for either the retire or proposed power line (Table 2). Six of those eight nest sites are located within the current Service (2019) recommended buffer distances (0.25 mile to 1.0 mile for the respective species) between occupied raptor nests and one of the target ROWs. As noted, none of the intact nest sites were occupied as of April 8, 2019. At least one of the ROWs also is completely or partially in view of most of the intact raptor nest sites (Table 2).

No known bald eagle nests or winter roost sites exist within the wildlife survey area, and no bald eagles were observed during the winter 2018/2019 roost surveys. No roosting or nesting habitat (mature trees) occurs within the wildlife survey area. Reliable food resources such as fish, black-tailed prairie dog colonies, sheep, etc. also are absent or extremely limited within the wildlife survey area.

Other Vertebrate Species of Concern

In addition to raptors, the MBTA protects all native, migratory, nongame birds and their nests. As noted, certain avian species are considered to be of special conservation concern by the Service (2008). These concerns may be related to population declines, small range or population sizes due to natural or human-caused factors, threats to habitat, or other factors. As previously mentioned, the Peabody 69 kV Reroute wildlife survey area is within BCR 17: Badlands and Prairies (Service 2008), which lists 28 avian species of conservation concern. The Service's (2019) IPaC report generated for the proposed project did not identify any avian species of concern that might occur in the wildlife survey area and, thus, be potentially affected by the project.

One hundred (100) avian species are grouped into various levels of conservation need in Wyoming's Partners In Flight (PIF) Bird Conservation Plan (Nicholoff 2003). Level I species need "conservation action," Level II species require "continued monitoring," and Level III species are of Local Interest.

The WGFD's (2016a) most recent list of SGCN includes 192 vertebrate species. However, that list includes numerous fish species and no fisheries will be affected by the proposed project. Within the list of SGCN, species are separated into tier levels based on a number of considerations, including regional and global population concerns, as well as the

ecological, logistical, and economical benefits or constraints of implementing conservation actions for each species. Tier I species are designated as being the 'highest priority', Tier II being of 'moderate priority', and Tier III are the 'lowest priority.'

Three vertebrate wildlife species of interest were observed in the Peabody 69 kV Reroute wildlife survey area during surveys conducted from early January through early April 2019 (Table 3). Numerous other avian species identified on the BCR 17, PIF, and SGCN lists are known to occur in the wildlife survey area. However, due to the project timing, clearance surveys were conducted before most species migrated back to the area. As discussed above, black-tailed prairie dogs were recorded in three colonies and golden eagles were documented on numerous occasions within the wildlife survey area. One mountain plover (*Charadrius montanus*) was seen foraging in a prairie dog colony in SWSE Section 3, T41N:R71W on March 28.

On October 2, 2015 (80 FR 59858), the Service announced its determination that listing the sage-grouse as a federally endangered or threatened species under the ESA was not warranted. The Service also indicated in its determination that another status review would be conducted for the species in 5 years (2020). However, following the October 2015 determination, the sage-grouse was no longer considered a candidate species and, therefore, continues to be managed at the State level (i.e., by the WGFD).

No Core Population or Connectivity areas for sage-grouse overlap the Peabody 69 kV Reroute wildlife survey area (WGFD 2015a, State of Wyoming 2015). WGFD records (2018) indicate that no known sage-grouse leks occur within the wildlife survey area. In addition, no sage-grouse leks were discovered and no sage-grouse were observed during surveys conducted from early January through early April 2019, including a targeted lek search in late March. The closest known sage-grouse lek (Black Thunder) is approximately 4.0 miles to the northeast. The WGFD (2018) has classified the Black Thunder lek as unoccupied – destroyed. Habitats within the wildlife survey area are suitable to support sage-grouse throughout most of the year. Moist draws and impoundments throughout the area could provide brood-rearing and late summer habitat, and areas of taller sagebrush could potentially support nesting sage-grouse. However, winter habitat is generally lacking throughout the wildlife survey area, with few areas present that host both topographic relief and particularly tall stands of sagebrush to provide refuge and forage during that time of the year.

No leks for the plains sharp-tailed grouse (*Tympanuchus phasianellus jamesi*) have been documented within 2.0 miles of the Peabody 69 kV Reroute project area (BLM 2017b). No grouse or their sign (e.g., feathers, droppings, tracks) were documented during any of the 2019 field surveys completed for the proposed project.

No WGFD (2008, 2010, 2012b, 2014, 2016b) big game crucial ranges, parturition areas, or migration routes overlap the Peabody 69 kV Reroute wildlife survey area. Additionally, no WGFD (2015b, 2015c) key nongame wildlife areas or habitat priority (crucial or enhancement) areas intersect or overlap the wildlife survey area.

In addition to those described above, several common vertebrate species were documented in the wildlife perimeter during surveys completed from early January through early April 2019. Mule deer (*Odocoileus hemionus*) and pronghorn (*Antilocapra americana*) were seen in small groups throughout the wildlife survey area. No predators or furbearers were recorded. The only herptile recorded was the boreal chorus frog (*Pseudacris maculata*). Numerous individuals were heard calling near a reservoir in SESE Section 15, T42N:R71W on April 8.

A few species of waterfowl were observed during the 2019 wildlife surveys; no wetland, bottomland, or water resource habitats would be disturbed by the proposed project. Species documented included the American wigeon (*Anas americana*), Canada goose (*Branta canadensis*), gadwall (*Mareca strepera*), and northern pintail (*Anas acuta*). Western meadowlarks (*Sturnella neglecta*) and horned larks (*Eremophila alpestris*) were prevalent throughout the area during the early spring surveys.

CONCLUSION

The Peabody 69 kV Reroute project has limited potential to cause negative impacts to federally listed species or other wildlife resources in the project area. For example, all new overhead power lines would be constructed using designs (H-frame construction) that meet or exceed current APLIC recommendations, thus minimizing any risks of avian electrocutions or collisions on those structures, and reducing maintenance needs (and associated disturbance activities). Incorporation of additional best management practices such as not driving on saturated roads, etc. will further minimize potential negative impacts to resources in the project area. Long-term disturbance will encompass approximately 8.7 linear non-contiguous acres and

will consist of the new overhead power line and its associated ROW corridor for periodic maintenance access. However, as noted, the location of the new power line within an existing infrastructure corridor will help consolidate disturbance in the project area. These efforts to co-locate infrastructure, along with several other factors, combine to either avoid or minimize potential direct and indirect impacts of the Peabody 69 kV Reroute project on federally listed species or other vertebrate species of concern. Those factors include:

- The absence of, and/or lack of potential disturbance to, federally listed species and/or their critical habitats within the wildlife survey area;
- The absence of candidate, proposed, or petitioned species under the ESA within the wildlife survey area;
- The limited presence and common nature of other vertebrate species of concern in the wildlife survey area;
- The location of the project area outside crucial habitats for current species of management concern;
- The lack of physical impacts to raptor nests in the wildlife survey area;
- The lack of disturbance to prairie dog colonies within the wildlife survey area;
- The location of all project-related surface disturbance in upland habitats;
- The use of construction designs that meet or exceed current APLIC (2006, 2012, 2015) recommendations;
- The limited nature of project-related disturbance (95.5 short-term linear acres; 8.7 long-term linear acres);
- The consolidation of the new power line in or near existing disturbance corridors (i.e., roads, a railroad, and existing overhead power line ROWs) to the extent possible, minimizing the overall impacts on surface disturbance and viewsheds in the area; and
- The commitment by PRECorp to conduct additional surveys, as needed, and honor timing stipulations associated with vertebrate species and wildlife features of concern (e.g., raptor nests) that could be affected.

Due to these factors, the Peabody 69 kV Reroute project will have no effect on T&E species or federal candidate, proposed, and petitioned species. Also, it will likely have no impact on other local vertebrate species of concern. Given the nature of the project and its location in an area with ongoing energy development and supporting infrastructure such as power lines, roads, and a railroad, overall impacts associated with the proposed project are expected to be minimal. As noted, if activities will overlap sensitive wildlife timelines (i.e., breeding season or winter roosting season), PRECorp will ensure that additional wildlife clearance surveys are conducted

prior to initiating any construction activities within species-specific buffer areas. The timing and location of project activities will be scheduled based on those survey results.

QUALIFICATIONS

Gwyn McKee is the President of and Principal Wildlife Biologist for Great Plains Wildlife Consulting, Inc. She earned B.S. and M.S. degrees in Wildlife Management/Ecology from the University of Missouri-Columbia, with several years of field experience as a professional biologist between degrees. She has more than 30 years of experience as a professional biologist, and has worked in several states spanning the Midwest, Great Plains, and Alaska. Since 1994, Gwyn's efforts have focused on the Powder River Basin of northeastern Wyoming and southeastern Montana, with regular work in western South Dakota during that period. Her work has involved a wide variety of wildlife mitigation planning and implementation, impact analyses and technical writing, NEPA document management and preparation, and inventories and systematic surveys for a wide variety of terrestrial and aquatic fauna (including federally listed and sensitive species) using approved agency protocols. She has authored and co-authored peer-reviewed professional journal articles, and occasionally serves as a peer review referee for professional journals or an invited speaker at professional meetings.

Nichole Rubeck is a wildlife biologist with GPWC and has worked with the team since 2009. She earned an M.S. degree in Fisheries and Wildlife from Michigan State University (2007) and a B.A. degree in Zoology from Ohio Wesleyan University (2003). Nichole assists with planning and conducting ground-based biological clearance surveys for special status species of the region, and writing various biological assessment reports and mitigation plans. Her experience in prairie habitats throughout Montana and Wyoming includes, but is not limited to: conducting monitoring for various avian species such as songbirds, mountain plovers, raptors, grouse, and waterfowl; performing avian nest clearance surveys prior to surface disturbance; conducting big game surveys; and implementing raptor mitigation measures. In addition, she has experience with small mammal and aquatic invertebrate surveys.

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Table 1. Calculation of disturbance associated with the proposed Peabody 69 kV Reroute project.

Proposed Action	Total Length (feet)	ROW Width (feet)	Potential Surface Disturbance within ROW Corridors (acres)	
			Short-term[1]	Long-term[2]
Construction and maintenance of new H-frame overhead power lines (4.78 miles)	25,219	100	57.9	8.7
Removal of existing H-frame overhead power lines (3.11 miles)	16,397	100	37.6	--
Total Disturbance			95.5	8.7

[1] Short-term surface disturbance within the ROWs will be caused primarily by overland vehicular traffic during transport of materials and line construction, and will be limited to the ROW width (100 feet) multiplied by the length of the line (also represented in feet) and then converted to acres (divided by a factor of 43,560 square feet [ft^2] per acre).

[2] Long-term surface disturbance associated with the new overhead power lines will consist of the bore site for each new power pole plus impacts associated with periodic overland travel in the ROW for line maintenance and repairs.
- Surface disturbance for each power pole bore hole is calculated using the area (7 ft^2) removed during augering for each new pole multiplied by a factor of 40 (the average number of poles needed for each mile of new line using H-frame construction [i.e., 20 poles/mile x 2 poles per site]). That product of 280 ft^2 of auger disturbance per mile is then multiplied by the length of the new line (in miles) and converted to acres (divided by a factor of 43,560 ft^2 per acre).
- The result for the total disturbance area across all bore holes is then added to the total surface disturbance associated with periodic overland maintenance travel, which is calculated as the average wheelbase (15 feet) of maintenance vehicles multiplied by the length of the new ROW (in feet) and converted to acres by dividing by a factor of 43,560 square feet per acre: total long-term disturbance = 280 ft^2 x new line length [4.78 miles]/43,560 + 15 feet x new ROW length (25,219)/43,560.

Table 2. Confirmed raptor nests within the Peabody 69 kV Reroute wildlife survey area.

Nest ID[1,2]	Substrate	UTM X	UTM Y	¼ ¼ Section, T(N):R(W)	2019 Status	2019 Condition[4]	Distance to nearest ROW[5]
		UTM NAD83[3], Zone 13 North					
BO8a	Prairie dog burrow	470782	4825748	NWSW 26, 42:71	Unoccupied	Good	0.05[6] (281 feet)
BO8b	Prairie dog burrow	470850	4825647	NWSW 26, 42:71	Unoccupied	Good	0.1[6] (515 feet)
BO8c	Prairie dog burrow	471465	4827163	NESW 23, 42:71	Unoccupied	Good	0.4
BO13	Prairie dog burrow	470522	4822039	SESE 3, 41:71	Former	---	---
FH9b4	Artificial nesting platform	472002	4827867	NENE 23, 42:71	Unoccupied	Good	0.7[6]
FH10a	Creek bank	471503	4822919	SENW 2, 41:71	Former	---	---
FH10c	H-frame poles	470655	4822327	NESE 3, 41:71	Former	---	---
FH10g	H-frame poles	470484	4822867	SENE 3, 41:71	Former	---	---
FH10h	Artificial nesting platform	470124	4822632	SWNE 3, 41:71	Unoccupied	Poor	0.3[6]
FH17b	Ground	471221	4830039	SESW 11, 42:71	Former	---	---
FH29c	Creek bank	469957	4829621	NWNE 15, 42:71	Former	---	---
FH29d	Ground	470238	4828327	SWSE 15, 42:71	Former	---	---
FH34a	Ground	468912	4823771	SESE 33, 42:71	Unoccupied	Fair	0.02[6] (95 feet)
FH34b	H-frame poles	468619	4823351	NWNE 4, 41:71	Former	---	---
GE13-1	Creek bank	469804	4826930	SESW 22, 42:71	Relocated	---	---
GE13-2	Creek bank	469456	4827649	SWNW 22, 42:71	Unoccupied	Poor	0.7
RTH6a/ GHO14d	Tree windbreak	471887	4823546	SWSE 35, 42:71	Former	---	---

Table 2. Continued.

Nest ID[1,2]	Substrate	UTM X	UTM Y	¼ ¼ Section, T(N):R(W)	2019 Status	2019 Condition[4]	Distance[5]
		UTM NAD83[3], Zone 13 North					
RTH6b/ GHO14c	Tree windbreak	471919	4823539	SWSE 35, 42:71	Former	---	---
SH8a/ GHO14a/ FH10d	Cottonwood	471756	4823298	NWNE 2, 41:71	Former	---	---
SH8b/ GHO14b/ RTH6c/ GE23-1	Tree windbreak	471836	4823501	SWSE 35, 42:71	Relocated	---	---
SH8d	Power pole	470837	4823414	SWSW 35, 42:71	Former	---	---
SH8e	Power pole	469265	4823482	SWSW 34, 42:71	Former	---	---
SH8f	Power pole	470840	4823963	NWSW 35, 42:71	Former	---	---
SH10a/ FH10e	Tree	468897	4823176	NENE 4, 41:71	Former	---	---
SH10b/ FH10f1	Artificial nesting platform	469433	4822961	SWNW 3, 41:71	Unoccupied	Fair	0.2[6]
SH26/ FH10j	Power pole	470040	4823555	SWSE 34, 42:71	Former	---	---
SH27	Power pole	470838	4828315	SWSW 14, 42:71	Former	---	---

[1] Nest ID represents raptor species using the nest, raptor nest territory, and raptor nest within the territory.

[2] BO = Burrowing owl; FH = Ferruginous hawk; GE = Golden eagle; GHO = Great horned owl; RTH = Red-tailed hawk; SH = Swainson's hawk.

[3] Universal Transverse Mercator (UTM), North American Datum (NAD); X = Easting coordinate, Y = Northing coordinate.

[4] Fair = Nest with vertical nest structure evident, but in need of minor repair following use or prior to next use.
Good = Nest with vertical nest structure and defined nest cup, needs only minor upkeep to be used.
Poor = Nest with little vertical nest structure evident, needs major repairs prior to next use.
Unknown = Nest is present but due to location (i.e., cavity) the condition cannot be determined.
--- = Nest no longer exists or no nest material was present.

[5] Distance to nearest ROW (retire or proposed) in miles.

[6] Retire or proposed ROW completely or partially in line-of-sight from nest site.

Table 3. Vertebrate wildlife species of interest[1] and their primary use habitats recorded within the Peabody 69 kV Reroute wildlife survey area[2] during surveys conducted from early January through early April 2019.

Species	Primary Use Habitat(s)
Black-tailed prairie dog[TII] (Cynomys ludovicianus)	Shortgrass Prairie
Golden eagle[3, LIII, TII] (*Aquila chrysaetos*)	Cliffs, Grasslands, Shrub-steppe, Riparian
Mountain plover[3, LI, TI] (*Charadrius montanus*)	Shortgrass Prairie, Sage-brush Grasslands

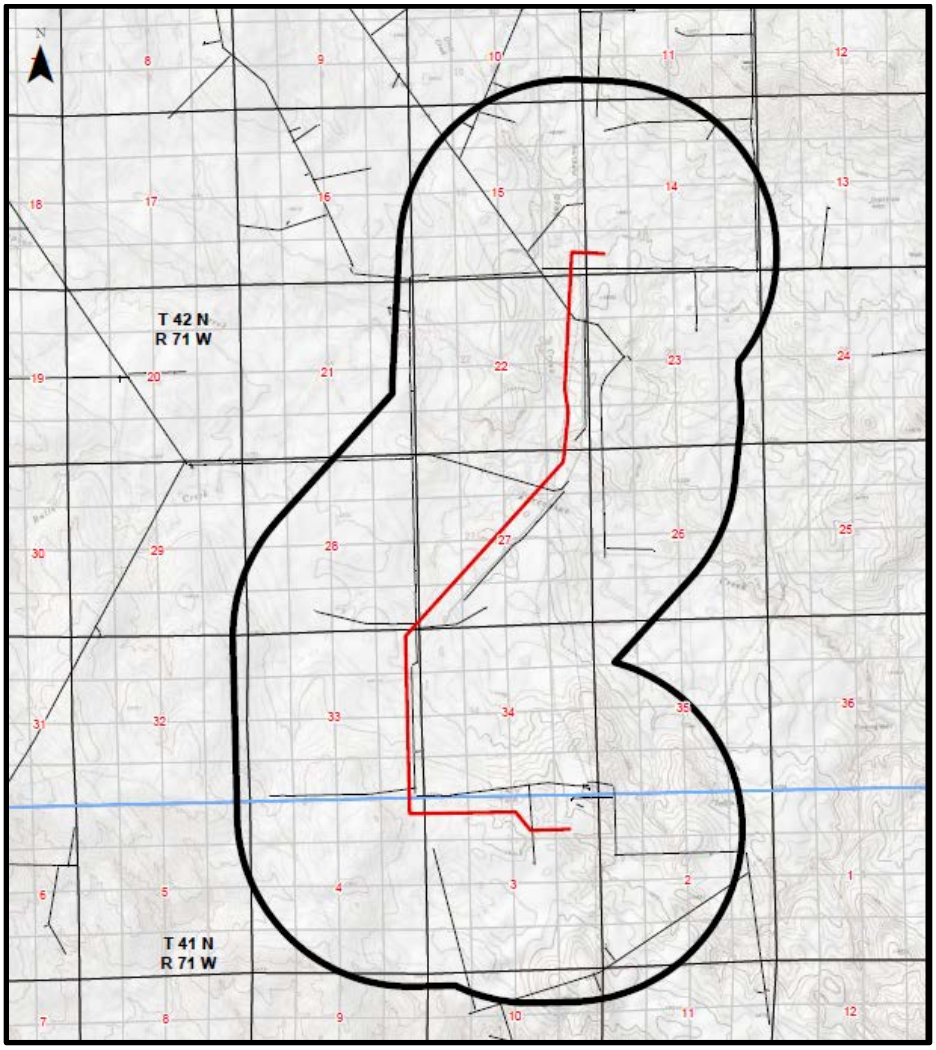
[1] Vertebrate wildlife species observed in the Peabody 69kV Reroute wildlife survey area during clearance surveys conducted from January 8 through April 8, 2019. Includes avian species identified in the Service's (2019) IPaC report for the proposed project, *Birds of Conservation Concern 2008* (Service 2008) list for Bird Conservation Region 17 (Badlands and Prairies), and Wyoming Partners in Flight (PIF, Nicholoff 2003) as well as all vertebrate species in the WGFD (2016a) list of Species of Greatest Conservation Need.

[2] The wildlife survey area extends for 1.0 mile beyond the proposed new and retired power line ROWs for the proposed project.

[3] Species on the Bird Conservation Region 17 (Badlands and Prairies) *Birds of Conservation Concern 2008* (Service 2008) list.
[LI, LIII] Species on the Wyoming Partners in Flight (PIF) list (Nicholoff, 2003). Level I (LI) indicates a clear need for conservation action. Level III (LIII) indicates a potential recommendation for conservation action for species of Local Interest.
[TI, TII] Species on the WGFD (2016a) list of Species of Greatest Conservation Need (available at https://wgfd.wyo.gov/WGFD/media/content/PDF/Habitat/SWAP/SGCN_2017List.pdf).
Tier I = Greatest priority. Tier II (TII) = Moderate priority.

Impacts of Project on Wyoming Game & Fish Department Managed Species

Peabody 69 kV HVD Reroute



Powder River Energy Corporation

POWDER RIVER ENERGY CORPORATION

April, 2019

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A. Clearance Survey for Threatened & Endangered Species, and Other Wildlife Species of Concern (GPW Consulting)

1.0 INTRODUCTION

1.1. Purpose and Need

The project will entail the construction of approximately 4.8 miles of new three-phase 69 kV High-voltage Distribution (HVD) power line, followed by the retirement of approximately 3.1 miles of similar HVD line. This project will result in a net addition of approximately 1.7 miles of HVD power line in the project area to accommodate the mining process. The project area is about 13.4 miles southeast of Wright, Campbell County, Wyoming. The proposed construction will occur on Forest Service, State and private lands. Powder River Energy Corporation (PRECorp) anticipates construction will commence in July, 2019 and will continue for approximately six (6) months.

The existing line, that will be rebuilt, extends across USFS leased surface by Peabody Mining. The mine anticipates removing the top-soil in this area within the next six months to accommodate mineral extraction.

The Peabody 69kV HVD Line move was not in PRECorp's Construction Work Plan (CWP), however the asset will be used as part of the security for PRECorp's AC 8 Loan with RUS. Any future maintenance would utilize RUS funding as well.

1.2. Project Area

PRECorp uses a buffer around the project of one-mile to conduct surveys and background checks. This buffer area is indicated on the map attached to the Clearance Survey for Threatened & Endangered Species, and Other Wildlife Species of Concern in Appendix A.

1.3. Background

The main purpose of interfacing with the Wyoming Game & Fish Department (WGFD) is so that PRECorp can seek opinions/advice regarding how projects may or may not interfere with wildlife or their habitat.

This section provides a summary of the information on which the Impacts of Project on Wyoming Game & Fish Department Managed Species is based. To initiate this project Great Plains Wildlife Consulting

was contracted to perform the wildlife surveys of this route. The following table provides more overall details of the project:

Company Initiating Project:	Powder River Energy Corporation
Company Primary Contact:	Tracy Jones, Manager of Land & Environmental Services
Project Name:	Peabody 69 kV HVD Line Reroute
Construction Work Plan (CWP):	2017-20
Amendment #:	Not Amended (740c Code = GF)
Location of Project:	T41 (N)-R71 (W) Sections 3, 4; T42 (N)-R71(N) Sections 14, 15, 22, 27, 28 and 33
County	Campbell (Wyoming)
Project Staff:	Tracy Jones, Manager of Land & Environmental Services; Joe Roth, Sr. Mgr. of Transmission and Substation Engineering; Gwyn McKee, Great-Plains Wildlife Consulting, contractor; Greg Newberry, Antiquus Cultural Resource Consulting, contractor.
Supplementary Wildlife Documentation (Appendix A)	Clearance Survey for Threatened & Endangered Species, and Other Wildlife Species of Concern; GPW Consulting
Current Land Use(s):	Livestock Grazing, Mining and Oil & Gas Extraction
Waterways on Site:	Run-off drainages into Horse Creek

2.0 PROJECT DESCRIPTION

This project consists of constructing a new power line using timber poles, timber cross arms, cable, anchors, auguring equipment, tamping equipment, nuts & bolts, insulators and insulator pins. After the new line is erected, the old line will be removed using the same equipment used to construct the new line. The project is broken into distinct sequences. These sequences are major project milestones which comprise, or make up the project. The project milestones are as follows:

- Material Staging & Lay-down
- Construction
- Retirement
- Demobilization
- Operation
- Maintenance

2.1. Project Area Sequencing

2.1.1. Material Staging & Lay-down

The material staging and lay-down consists of mobilizing the materials to the job site and laying out the poles and equipment where they will be placed in the ground during construction. Most likely, this task happens immediately before the construction activity starts. The materials will be delivered to the location via county access roads on flatbed trucks. The disturbance will consist of laying materials down on the ground and will last approximately 10 to 30 minutes per structure. There will be a total of 52 structures, so this activity is expected to last three to four days. The lay-down is usually done immediately before the construction is anticipated to begin.

2.1.2. Construction

The construction occurs in an orderly fashion. The first activity that occurs is the crews move from structure to structure to attach the pins, cross arms and insulators to the poles. This is soon followed by revisiting each structure location with an auger truck to bore two holes for the poles in the staked locations. Each site is visited again to pick the poles up with the auger truck and place them in the holes previously drilled. The soil tailings from the borings are tamped around the base of the poles with a pneumatic tamper powered by a portable air compressor. Any excess soil is compacted around the pole so that water runs away

from the base of the pole. The crew moves on to the next structure to be placed. This repetition occurs until all the structures are set in the ground. The cumulative visits and activity to each structure is estimated to take a total of about 60 to 120 minutes from start to finish for each location. The conductor is run from structure to structure using a truck for pulling and a bucket truck to secure the conductor to string the cable through the insulators properly. When the last structure has been strung, tension is placed on the conductor to 50% or less of the ultimate breaking strength of that particular cable. This reduces the cable swing and sag to prevent incidental faults. Each structure is visited one last time to tie off the conductor to the insulator strings mounted to the crossarms. The conductor stringing takes approximately 60 to 120 minutes per structure.

2.1.3. Retirement

The retirement of the old line occurs immediately following the construction and energization of the new line. Similar to construction, only in reverse, the crew first removes the tap wires, which de-energizes the line leaving a power line that is safe to work on. The crews remove the old conductor by moving from pole to pole to loosen or remove the conductor ties to the insulators. The conductor is then dropped to the ground and pulled from one location using a hydraulic reel similar to winding up a garden hose. This process is done very slowly to ensure the loose ends do not get tangled up or injure someone on the ground. After the conductor is removed, each pole is pulled, or plucked, from the ground by the bucket truck using large pinchers on the end of the boom. The pole is rotated on its side and laid on the ground. The pole is then stripped of any bolts, nuts, and loose wire or cross arms before being transported back into the warehouse. The void in the ground is filled with loose material around the base of the pole. In the event there is not enough loose material at the base of the pole to back fill the hole, loose material will be gathered from nearby to fill the hole. Collecting material from the area will ensure no non-indigenous or non-native materials will be introduced to the area due to human activity. This disturbed location is about 3-5’ in diameter when completed. The retirement process takes approximately 30-60 minutes per structure.

2.1.4. Demobilization

During the demobilization phase, the crews gather up all loose or excess materials and make sure nothing is left that was not there when they started the construction process. Additionally, if any ground destruction in the form of ruts or vegetation removal occurs, crews prepare the area for re-seeding. The demobilization takes about 10 minutes per pole unless habitat destruction occurs then additional preparation time is needed to reclaim those areas.

2.1.5. Operation & Maintenance

The operation of the line is relatively unnoticed after the poles are standing. Electricity is something that is not visible. The energy running through the cables does not need people in the field to operate.

The maintenance is virtually nonexistent as well for the first 10 years. The line maintenance program is set up, theoretically, to have a crew come around to each pole every 5-10 years to tighten hardware (nuts & bolts). This activity usually lasts for roughly 30 minutes per pole.

2.2. Mitigation and Monitoring

It is anticipated that construction on this project will commence in July 2019. Construction is estimated to continue through the end of December, 2019. If activities overlap sensitive wildlife timelines, PRECorp will ensure that additional wildlife clearance surveys are conducted prior to construction activities within species specific buffer areas. The timing and location of project activities will be scheduled centered on those survey results. No known bald eagle nests or winter roost sites have been documented in or within 1.0 mile of the projects right of ways. No raptor nests were documented within the survey area during the 2019 survey. Therefore, no intact raptor nests will be physically impacted by this project. PRECorp is committed to honoring timing stipulations and additional surveys for eagles and raptors will completed prior to construction as well as during construction as warranted. The new line being constructed is designed to meet or exceed current guidelines and recommendations outlined by the Avian Power Line Interaction Committee (APLIC, 2006). During the maintenance of this line, linemen are trained to report any wildlife impacts. If any negative wildlife impacts are anticipated, activity will halt immediately

until the next course of action is determined and notification made to the Wyoming Game and Fish Department.

3.0 ENVIRONMENTAL BASELINE

3.1. Existing Baseline Conditions

The existing baseline conditions include effects of past and ongoing human and natural factors in the immediate vicinity of the project area. As identified in section 1.2, this area is chiefly used for livestock grazing, mining and oil production activities. Farm machinery operation, vehicle usage, oil production equipment, human presence, existing power line operation, and domestic animals roaming make up the baseline conditions. Many gravel and two track roads transect the area. A three (3) track rail line also runs through the center of the survey area. Existing overhead transmission and distribution power lines also are present. The consistent and frequent use of railroad equipment and trains, mining equipment, farm machinery, oil production equipment, vehicle use and human presence in this area has either forced the wildlife to habituate or avoid the area during use.

3.1.1. Haying Operations

No appreciable hay productions occur within the one-mile buffer of the project. Only small sections of land are hayed during heavy moisture years when the grass grows tall.

3.1.2. Rural Residential

No rural residential building exist within the one-mile buffer of the project. There are a few outbuildings along with some stock wells services within the area.

3.2. WGFD Managed Wildlife Species

There are several species managed by the WGFD. The following are known to frequent this area:

Large Mammals: mule & white-tailed deer, coyote, mountain lion and pronghorn.

Small Mammals: bobcat, badger, raccoon, porcupine, fox, striped skunk and rabbits.

Upland Birds: sharp-tailed grouse, mourning dove, crow and Hungarian partridge.

Waterfowl: geese, duck

Non-game Species: raptor species (eagles, hawks, owls, etc.)

4.0 NATURAL HISTORY AND SPECIES OCCURRENCE

4.1 Large Mammals

This area has historically played home to various large mammal species. The location of this project is within mule deer unit #10, antelope unit #27 and mountain lion unit #24. These are not the only large mammal species managed by the WGFD, but they make up the largest quantities of large mammals in the area.

4.2 Small Mammals

Various small mammals also call this area home. Bobcat, badger, raccoon, porcupine, fox, skunk and rabbit are prevalent throughout this area.

4.3 Upland Birds

Mourning dove, crow and hungarian partridge make up the largest quantities of upland birds in the area. During the March 2019 survey no sign of sage grouse lekking areas were documented. The closest known sage-grouse lek is the Black Thunder lek approximately 4 miles to the northeast. The location of the project is outside of designated sage-grouse core areas and connectivity corridors. No plains sharp-tailed grouse leks have been documented within 2.0 miles of the project ROW. For more information on the grater sage-grouse the Clearance Survey for Threatened & Endangered Species and Other Wildlife Species of Concern is attached as Appendix A.

4.4 Waterfowl

Geese and duck may use this area on occasion. This mainly occurs immediately after run-off where water is abundant and pooled in low-lying areas.

4.5. Non-game, Rare, Protected or Endangered Species

There are currently two species that are candidate, proposed or listed as endangered species.

Species Common Name	Scientific Name	Status	Habitat
Ute Ladies-tresses	Spiranthes diluvialis	Threatened	Seasonally moist Soils and wet meadows of drainages below 7,000 ft. elevation
Northern long-eared Bat	Myotis septentrionalis	Threatened	Cracks, crevices, cavities and under the bark of live or dead trees, caves and mines

5.0 ANALYSIS OF EFFECT OF THE PROJECT

5.1 Direct Effects

The direct effects of this project include: driving vehicles on access roads, human presence, vegetation damage, topsoil disturbance, small mammal disturbance and sound disturbance. The proximity of the effects is isolated to the immediate area around where the power line will be erected. The specific definition of each effect is as follows:

- Driving vehicles on access roads: this effect may occasionally disturb wildlife that may be crossing over, traveling on or feeding on the access road by disrupting their current activity. The responses will most likely be annoying to the wildlife and could alarm them at times. This disruption does not typically have a fatal effect. Vehicles currently frequent these accesses year round. The existing wildlife has been habituated to this activity.
- Human presence: the human activity that occurs will most likely cause a startling or alarming response in any of the

wildlife species of concern here. This activity can vary from walking around to human conversations that occur during the project.

- Vegetation damage: the vegetation damage that could occur would happen with equipment movement, hole boring and repeat traffic over the undisturbed areas when work has to be done off the access roads. Any of these activities will damage vegetation. The most damage occurs during off-road travel with vehicles during wet conditions. This will be avoided when possible.
- Topsoil disturbance: the topsoil disturbance happens during the same activities that may damage the vegetation. Topsoil disturbance happens during the auguring process, trenching process and during equipment movement when the soil contour or surface-soil is altered.
- Small mammal disturbance: small mammal disturbance occurs if linemen come across any type of wildlife and that encounter alters the wildlife's activity or natural behavior. This may occur along this route with rodents, small game or birds. It is anticipated that raptors will be encountered. However, this intrusion should have a minimal impact on any of these species. Most of these coincidences will be alarming or annoying to wildlife as they are used to seeing varying types of activity now.
- Sound disturbance: sound disturbance will occur regularly from small human conversation to loud machinery. Every day that construction occurs, there will be linemen talking to each other, tools creating metal-on-metal sounds, trencher equipment operating and trucks making noise. The intensity of these noises ranges from normal conversation (60-70 dB) to the loudest of the noises which is the pneumatic impact tamper (85-95 dB) used to firm up the loose ground around the new pole (GC Audio, 2007). The longevity of the noises is directly proportional to the noise intensity. The linemen converse frequently to coordinate while the pneumatic tamper only

happens when the poles are being set. The tamping occurs for about 10 minutes per pole or 20 minutes per structure.

The duration (cumulatively) of these effects will last approximately four (4) months. The frequency of disturbances will be Monday through Friday between the hours of 7:00 a.m. and 6:00 p.m. during the construction period. The distribution of the disturbances will move along the line where the crews happen to be and typically will not occur along the entire length of the line at any one given time.

6.0 AVOIDANCE, MINIMIZATION AND CONSERVATION MEASURES

6.1. Standard Specifications

PRECorp follows suggestions and guidelines where available for environmental protection. In support of this objective, PRECorp developed its first Avian Protection Plan (APP) in 2005. Since that time PRECorp's Board of Directors has adopted a restructured APP in December, 2010. PRECorp follows construction standards that are RUS standard designs (RUS Bulletin 1728F-811, 1999).

PRECorp follows the National Electric Safety Code (NESC) rules. These rules are updated approximately every five years, but the latest version can be found at the following link: http://standards.ieee.org/about/nesc/ (NESC, 2019).

6.2. Non-contractual Obligations and Agreements

PRECorp does have non-contractual obligations with the USFWS (Law Enforcement) regarding avian protection and how the old antiquated system is to be retrofitted to make it raptor safe. These obligations surround what PRECorp is doing to minimize impacts on avian species. PRECorp has entered into a non-obligatory Avian Protection Plan to outline their commitments to avian species.

PRECorp has a commitment with the Wyoming Public Service Commission to adhere to the Wyoming Governor's Executive Order

#2015-4. This order lays out the guidelines to minimize impacts on the greater sage-grouse.

PRECorp has committed to use avoidance and rerouting of power lines to minimize impact on wildlife. PRECorp will reclaim any areas where vegetation is destroyed, causing premature erosion and degradation of topsoil.

7.0 WETLANDS AND RIPARIAN AREAS

Wetlands and riparian areas are scattered throughout the project area. Porcupine Creek is the main drainage within the survey area. This creek is classified as a stream in Campbell County, Wyoming. All traffic will access the construction of this line from existing roads. No traffic, foot or other, will cross any creek or reservoir. More information regarding riparian corridors and bottomland areas can found in Appendix A.

8.0 IMPACTS TO WGFD MANAGED WILDLIFE

8.1. Large Mammals

No additional impacts to large mammal or big-game species are anticipated. No WGFD big game crucial ranges, parturition areas or migration routes overlap the project area. These animals have become habituated to the consistent and frequent use of farm machinery, oil production and gravel pit activity as well as human presence in the area. The activity associated with building this line will indeed have some annoyances to the wildlife, but the overall impact is minimal to these animals.

8.2. Small Mammals

The northern long-eared bat is a year-round resident of northeastern Wyoming. This bat primarily inhabits forested regions, typically roosting in crevices and cavities of trees and under loose bark. They hibernate in caves and abandoned mine sites. This project is not located in the known and suspected occupancy range for this species. The project's ROW does not intersect with any feasible NLEB habitats and as such this project should have little to no impact on potential habitat for this species.

8.3. Upland Birds

The greater sage-grouse is not currently considered a candidate species. There are no sage-grouse leks located within 2.0 miles of the project ROW. The nearest sage-grouse lek is the Black Thunder lek. This lek is

approximately 4.0 miles to the northeast. No observation of grouse or their sign were documented with the survey area during the March 2019 survey. Little sagebrush habitat was documented within the area. For more information on the greater sage-grouse the Clearance Survey for Threatened & Endangered Species and Other Wildlife Species of Concern Report is attached as Appendix A.

8.4. Waterfowl

No impacts to waterfowl are anticipated due to the fact that most of these wetland habitats are intermittent in nature.

8.5. Non-game, Rare, Protected or Endangered Species

All or portions of six black-tailed prairie dog (BTPD) colonies were within or overlapped some portion of the survey areas. This species is considered a prey-base for many raptors and larger mammals.

There are known platform and native raptor nests shown in figure 1. No known bald eagle nests or winter roost sites exist within the project area. No active raptor nests were documented within the project area in March of 2019. PRECorp is committed to honoring timing stipulations and additional surveys for eagles and raptors. Surveys will be completed prior to construction as well as during construction as warranted. The new line being constructed is designed to meet or exceed current guidelines and recommendations outlined by the Avian Power Line Interaction Committee (APLIC, 2006). During the maintenance of this line, linemen are trained to report any wildlife impacts. If any negative wildlife impacts are anticipated, activity will halt immediately until the next course of action is determined and notification made to the WGFD.

9.0 ALTERNATIVES TO THE PROPOSED PROJECT

9.1. Proposed Route

This proposed route is using one of the least impactful path. In addition, it is the only route across the USFS. The USFS portion has been successfully amended where we used a “corridor”.

9.2. No-action Alternative

There is always a no-action alternative. This was not considered as Peabody owns the mineral rights on the leased USFS property. PRECorp is required to move the lines to allow them to recover those minerals.

10.0 REFERENCES

Avian Power Line Interaction Committee (APLIC). 2006. *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006.* Edison Electric Institute, APLIC, and the California Energy Commission. Washington, D.C. and Sacramento, CA.

Galen Carol Audio (GC Audio), (2007). *Decibel (Loudness) Comparison Chart*, Galen Carol Audio Website: http://www.gcaudio.com/resources/howtos/loudness.html

IEEE Standards Association, National Electrical Safety Code (NESC), (2019). *National electrical safety code.* IEEE Website. Retrieved from http://standards.ieee.org/about/nesc/

U.S. Department of Agriculture, Rural Development. (2000). *Electric Transmission Specifications and Drawings, 115 kV Through 230 kV line construction (1728F-811).* Washington, DC: Government Printing Office.

U.S. Department of the Interior, U.S. Fish & Wildlife Service (USFWS). (2003). *Endangered species act of 1973 as amended.* Washington, DC: Government Printing Office.

APPENDIX

Appendix A

Landowner Contact List

Peabody 69 kV Line Move

BTU Western Land Resources (Scott Durgin, President)

701 Market Street, STE. 700

St. Louis, MO 63101

Project Lead: Kendra Quick 307-685-6704

Bridle Bit Ranch Company & Jerry Dilts Family Limited Partnership I

Attn: Brandon J. Dilts

6546 State HWY 59 S.

Gillette, WY 82718

307-464-0652

Office of State Lands and Investments

122 West 25th Street, 3W

Herschler Building

Cheyenne, WY 82002-0600

Attn: Mardy Rapp

307-777-7331

United States Forest Service

2250 East Richards Street

Douglas, WY 82633

Attn: Cordie Lyons

307-358-7114

WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

wgfd.wyo.gov

April 29, 2019

WER 14224.00
Powder River Energy Corporation
Peabody 69 kV Line Move
Work Order No. 180333
Campbell County

Tracy Jones
Powder River Energy Corporation
221 Main Street
P.O. Box 930
Sundance, WY 82729

Dear Ms. Jones,

The staff of the Wyoming Game and Fish Department (Department) has reviewed the proposed Peabody 69 kV Line Move (Work Order No. 180333) located in Campbell County. We offer the following comments for your consideration.

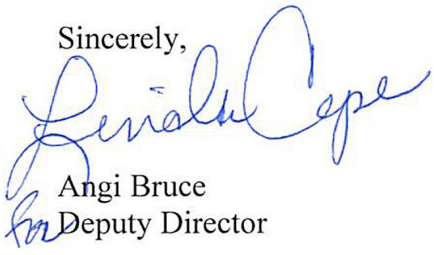
The proposed project involves the construction of 4.8 miles of new overhead line and the removal of 3.1 miles of existing overhead line between July and December 2019. The new line is located within one mile of several intact raptor nests; however, none have been documented as active this year. If any of these nests are found to be active, activity associated with both line construction and removal should be conducted outside of the species-specific seasonal and spatial buffers. We recommend consulting with the U.S. Fish and Wildlife Service regarding these buffers.

The new line is also located within potential mountain plover habitat, where mountain plover observations have occurred. We recommend minimizing surface occupancy during the breeding season (April – July) or habitat conversions within 0.25 mile of known breeding concentrations, and protecting nesting areas from land conversion or habitat destruction, as this species exhibits a high degree of fidelity to nesting territories.

Additionally, we recommend marking overhead power lines that cross perennial waters or other drainages where waterfowl use has been observed in order to increase visibility of the line and reduce potential avian collisions.

Thank you for the opportunity to comment. If you have any questions or concerns please contact Erika Peckham, Gillette Wildlife Biologist, at (307) 670-8164.

Sincerely,



Angi Bruce
Deputy Director

AB/aw/ml

cc: U.S. Fish and Wildlife Service
Erika Peckham, Wyoming Game and Fish Department
Dan Thiele, Wyoming Game and Fish Department
Chris Wichmann, Wyoming Department of Agriculture