Office of Energy Projects

May 2026

Texas Gas Transmission, LLC **Docket No. CP26-16-000**

Carnation Project

Environmental Assessment

NEPA Unique ID: EAXX-019-20-000-1767610234.

Washington, DC 20426

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas Branch 5
Texas Gas Transmission, LLC
Carnation Project
Docket No. CP26-16-000

TO THE INTERESTED PARTY:

The staff of the Federal Energy Regulatory Commission (FERC or Commission) has prepared an environmental assessment (EA) for the Carnation Project (Project), proposed by Texas Gas Transmission, LLC (Texas Gas), in the above-referenced docket.[1] Texas Gas requests authorization to modify, construct, and operate natural gas facilities in Hamilton County, Ohio, including one new 14,189-horsepower compressor unit and ancillary facilities at the existing Crosby-Harrison Compressor Station, and two new single-run regulators and associated aboveground piping at the New Haven Regulators Facility.

Any person wishing to comment on the EA may do so. To ensure consideration of your comments on the proposal prior to making a decision on the Project, it is important that the Commission receive your comments **on or before 5:00pm Eastern Time on June 10, 2026**. Instructions for filing comments are provided on page 2.

FERC is the lead federal agency for authorizing interstate natural gas transmission facilities under the Natural Gas Act of 1938 (NGA) and the lead federal agency for preparation of the EA. The EA assesses the potential environmental effects of the Project in accordance with the requirements of the National Environmental Policy Act (NEPA)[2] and the Commission's implementing regulations.[3] The principal purposes of the EA are to: identify and assess the potential effects on the natural and human environment; describe and evaluate reasonable alternatives; identify and recommend mitigation measures; and facilitate public involvement in the environmental review process. The EA concludes that approval of the proposed project would not constitute a major federal action significantly affecting the quality of the human environment.

The Commission mailed a copy of the *Notice of Availability* of the EA to federal, state, and local government representatives and agencies; elected officials; Native American tribes; environmental and public interest groups; potentially affected landowners and other interested individuals and groups; and newspapers and libraries in the project area. The EA is only

[1] For tracking purposes under the National Environmental Policy Act, the unique identification number for documents relating to this environmental review is EAXX-019-20-000-1767610234.
[2] National Environmental Policy Act of 1969, as amended (Public Law [Pub. L.] 91-190. 42 U.S.C. 4321–4347, as amended by Pub. L. 94-52, July 3, 1975; Pub. L. 94-83, August 9, 1975; Pub. L. 97-258, §4(b), September 13, 1982; Pub. L. 118-5, June 3, 2023; Pub. L. 119-21, July 4, 2025).
[3] 18 Code of Federal Regulations (CFR) 380.

available in electronic format. It may be viewed and downloaded from the FERC's website (www.ferc.gov), on the natural gas environmental documents page (https://www.ferc.gov/industries-data/natural-gas/environment/environmental-documents). In addition, the EA may be accessed by using the eLibrary link on the FERC's website. Click on the eLibrary link (https://elibrary.ferc.gov/eLibrary/search), select "General Search" and enter the docket number in the "Docket Number" field, excluding the last three digits (i.e. CP26-16). Be sure you have selected an appropriate date range. For assistance, please contact the FERC Online Support at FercOnlineSupport@ferc.gov or toll free at (866) 208-3676, or for TTY, contact (202) 502-8659.

The EA is not a decision document. It presents Commission staff's independent analysis of the environmental issues for the Commission to consider when addressing the merits of all issues in this proceeding. Under section 7(c) of the NGA, the Commission determines whether interstate natural gas transportation facilities are in the public convenience and necessity and, if so, grants a Certificate of Public Convenience and Necessity to construct and operate them. The Commission bases its decisions on both economic issues, including need, and environmental effects.

Your comments should focus on the EA's disclosure and discussion of potential environmental effects, reasonable alternatives, and measures to avoid or lessen environmental effects. The more specific your comments, the more useful they will be. For your convenience, there are three methods you can use to file your comments to the Commission. The Commission encourages electronic filing of comments and has staff available to assist you at (866) 208-3676 or FercOnlineSupport@ferc.gov. Please carefully follow these instructions so that your comments are properly recorded

(1) You can file your comments electronically using the eComment feature on the Commission's website (www.ferc.gov) under the link to FERC Online. This is an easy method for submitting brief, text-only comments on a project;

(2) You can also file your comments electronically using the eFiling feature on the Commission's website (www.ferc.gov) under the link to FERC Online. With eFiling, you can provide comments in a variety of formats by attaching them as a file with your submission. New eFiling users must first create an account by clicking on "eRegister." You must select the type of filing you are making. If you are filing a comment on a particular project, please select "Comment on a Filing"; or

(3) You can file a paper copy of your comments by mailing them to the Commission. Be sure to reference the project docket number (CP26-16-000) on your letter. Submissions sent via the U.S. Postal Service must be addressed to: Debbie-Anne A. Reese, Secretary, Federal Energy Regulatory Commission, 888 First Street NE, Room 1A, Washington, DC 20426. Submissions sent via any other carrier must be addressed to: Debbie-Anne A. Reese, Secretary, Federal Energy Regulatory Commission, 12225 Wilkins Avenue, Rockville, Maryland 20852.

Filing environmental comments will not give you intervenor status, but you do not need intervenor status to have your comments considered. Only intervenors have the right to seek rehearing or judicial review of the Commission's decision. At this point in this proceeding, the timeframe for filing timely intervention requests has expired. Any person seeking to become a party to the proceeding must file a motion to intervene out-of-time pursuant to Rule 214(b)(3) and (d) of the Commission's Rules of Practice and Procedures (18 CFR 385.214(b)(3) and (d)) and show good cause why the time limitation should be waived. Motions to intervene are more fully described at https://www.ferc.gov/how-intervene.

For public inquiries and assistance with making filings such as interventions, comments, or requests for rehearing, contact the Office of Public Participation at (202) 502-6595 or OPP@ferc.gov. Additional information about the project is available from the FERC website (www.ferc.gov) using the eLibrary link. The eLibrary link also provides access to the texts of all formal documents issued by the Commission, such as orders, notices, and rulemakings.

In addition, the Commission offers a free service called eSubscription which allows you to keep track of all formal issuances and submittals in specific dockets. This can reduce the amount of time you spend researching proceedings by automatically providing you with notification of these filings, document summaries, and direct links to the documents. Go to https://www.ferc.gov/ferc-online/overview to register for eSubscription.

Commission Staff Page Limit and Deadline Certifications

I certify that Commission staff has considered the factors mandated by the National Environmental Policy Act and that this environmental document represents a good-faith effort to disclose the most important considerations required by NEPA within the statutory page limit (42 U.S.C. § 4436a(e)) and the statutory deadline (42 U.S.C. § 4336a(g)). This certification reflects staff's expert judgment that the analysis contained within this environmental document is an accurate representation of the potential environmental effects of the proposed action and the analysis is substantially complete. In staff's judgement, any considerations addressed briefly or left unaddressed would not meaningfully inform the assessment of environmental effects.

Gertrude Fernandez Johnson, Director
Division of Gas – Environment and
Engineering

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Technical Abbreviations and Acronyms

APE	Area of Potential Effect
CFR	Code of Federal Regulations
CH_4	methane
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
Commission	Federal Energy Regulatory Commission
dB	decibels
dBA	decibels on the A-weighted scale
DOT	Department of Transportation
EA	environmental assessment
EI	Environmental Inspector
FEMA	U.S. Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
GHG	greenhouse gas
HAP	hazardous air pollutant
IPaC	Information for Planning and Consultation
L_{dn}	day-night sound level
L_{eq}	equivalent sound level
MBTA	Migratory Bird Treaty Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NGA	Natural Gas Act
N_2O	nitrous oxide
NO_x	Nitrogen oxides
NO_2	nitrogen dioxide
Notice of Scoping	*Notice of Scoping Period Requesting Comments on Environmental Issues for the Carnation Project*
NRHP	National Register of Historic Places
NSA	noise-sensitive area
ODNR	Ohio Department of Natural Resources
OEP	Office of Energy Projects
Plan	*Upland Erosion Control, Revegetation, and Maintenance Plan*
PM	particulate matter
$PM_{2.5}$	particulate matter smaller than 2.5 microns
PM_{10}	particulate matter smaller than 10 microns
Procedures	*Wetland and Waterbody Construction and Mitigation Procedures*
Project	Carnation Project
SWPPP	Project-specific Stormwater Pollution Prevention Plan
PSD	Prevention of Significant Deterioration

SHPO	State Historic Preservation Officer
SIL	Significant impact level
SO_2	sulfur dioxide
SPRPP	Spill Prevention, Response and Procedures Plan
Texas Gas	Texas Gas Transmission, LLC
tpy	tons per year
U.S.	United States
USGS	United States Geological Survey
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compounds

SECTION A – PROPOSED ACTION

A.1 INTRODUCTION

The staff of the Federal Energy Regulatory Commission (Commission or FERC) has prepared this environmental assessment (EA) to assess the environmental effects of the Carnation Project (Project), proposed by Texas Gas Transmission, LLC (Texas Gas). On October 31, 2025, pursuant to Sections 7(c) of the Natural Gas Act (NGA) and Part 157 of the Commission's regulations, Texas Gas filed an application with the Commission in Docket No. CP26-16-000 seeking authorization to modify, construct, operate, and maintain natural gas compression facilities in Hamilton County, Ohio.

A.2 PURPOSE AND NEED

Texas Gas states that the purpose of the Project is to increase the capacity of Texas Gas's interstate natural gas transmission system by about 170,000 dekatherms per day. According to Texas Gas, the Project is needed to help ensure a dependable natural gas supply for Southwest Ohio during periods of peak demand and constrained transportation capacity.

A.3 SCOPE OF THIS ENVIRONMENTAL ASSESSMENT

The topics addressed in this EA include geology; soils; water resources and wetlands; vegetation and wildlife; land use and visual resources; cultural resources; air quality; noise; reliability and safety; and cumulative effects, including climate change. Section B of the EA describes the affected environment as it currently exists, discusses the environmental consequences of the proposed Project, identifies measures proposed by Texas Gas to reduce effects, and presents our[4] additional recommended mitigation measures. Section C of the EA evaluates alternatives to the proposed action. In section D of the EA, we summarize our conclusions and recommendations to the Commission to incorporate certain mandatory environmental conditions in any Certificate it may issue to Texas Gas for the proposed Project.

As the lead federal agency for the Project, the FERC is required to comply with Section 7 of the Endangered Species Act, as amended, and Section 106 of the National Historic Preservation Act. We have considered these statutes in the preparation of this EA. The FERC will use this document to consider the likely environmental effects that could result if it authorizes the Project. In addition to the FERC, other federal, state, and local agencies may use this EA in approving or issuing any permits necessary for all or part of the proposed Project. Permits, approvals, and regulatory consultations for the Project are discussed in section A.10.

A.4 PUBLIC REVIEW AND COMMENTS

On December 3, 2025, the Commission issued a *Notice of Scoping Period Requesting Comments on Environmental Issues for the Carnation Project* (Notice of Scoping). The Notice of Scoping was sent to affected landowners; federal, state, and local government agencies;

[4] "We," "us," and "our" refer to the Commission's environmental and engineering staff of the Office of Energy Projects.

elected officials; Native American Tribes; environmental and public interest groups; other interested parties; and local libraries and newspapers. Publication of the Notice of Scoping established a 30-day public comment period for submission of comments, concerns, and issues related to the environmental aspects of the Project. The public scoping period closed on January 2, 2026. All comments received by the Commission are part of the public record for the Project and are available for viewing on the FERC website (www.FERC.gov), using the eLibrary link.

In response to the Notice of Scoping, we received comments from Our Children's Trust. Our Children's Trust expressed concern that the Project would enable fossil fuel air pollution and threaten children's health and welfare.[5] Our Children's Trust's comments raise general concerns about fossil fuel use and its effects, but do not raise any issues specific to the effects of constructing and operating Project. Accordingly, Our Children's Trust's comments are beyond the scope of this analysis.

A.5 PROPOSED FACILITIES

The Project involves the construction and operation of the following facilities/equipment at the existing Crosby-Harrison Compressor Station in Hamilton County, Ohio:

- one new 14,189-horsepower compressor unit;
- one discharge filter separator;
- one emergency generator;
- one unit blowdown silencer;
- one electrical building;
- one storage building; and
- associated piping and controls, and other auxiliary facilities.

At the New Haven Regulators Facility, also in Hamilton County, Texas Gas proposes to construct and operate:

- two new single-run regulators;
- 20 feet of aboveground piping;
- 150 feet below ground piping; and
- associated controls.

The general locations of the project facilities are shown in Figures A-1, A-2, and A-3**.**

[5] Our Children's Trust December 4, 2025, Comment, FERC eLibrary Accession No. 20251204-5139.

Figure A-1 Project Overview and Facilities Location

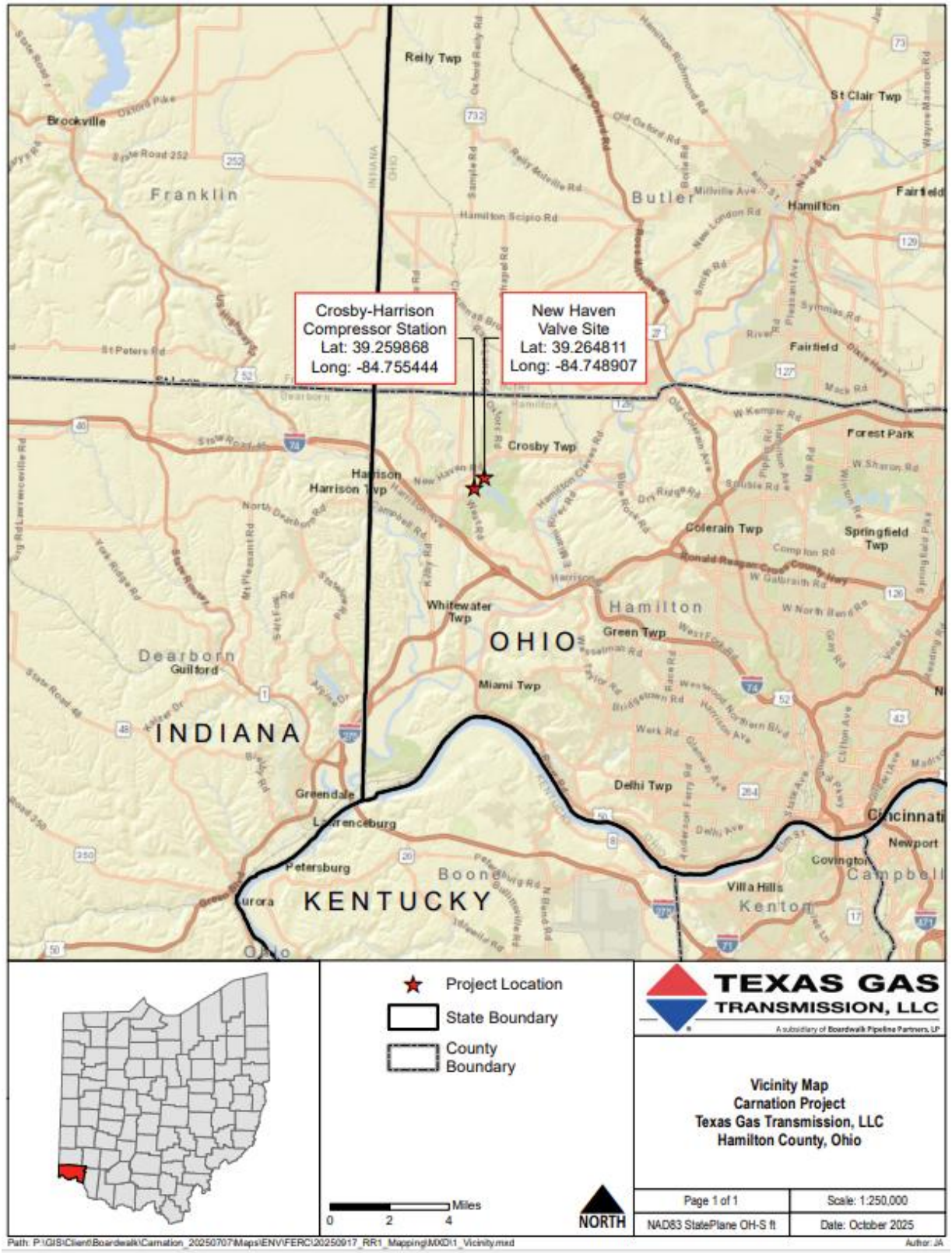


Figure A-2 Project Aerial Map of Crosby-Harrison Compressor Station

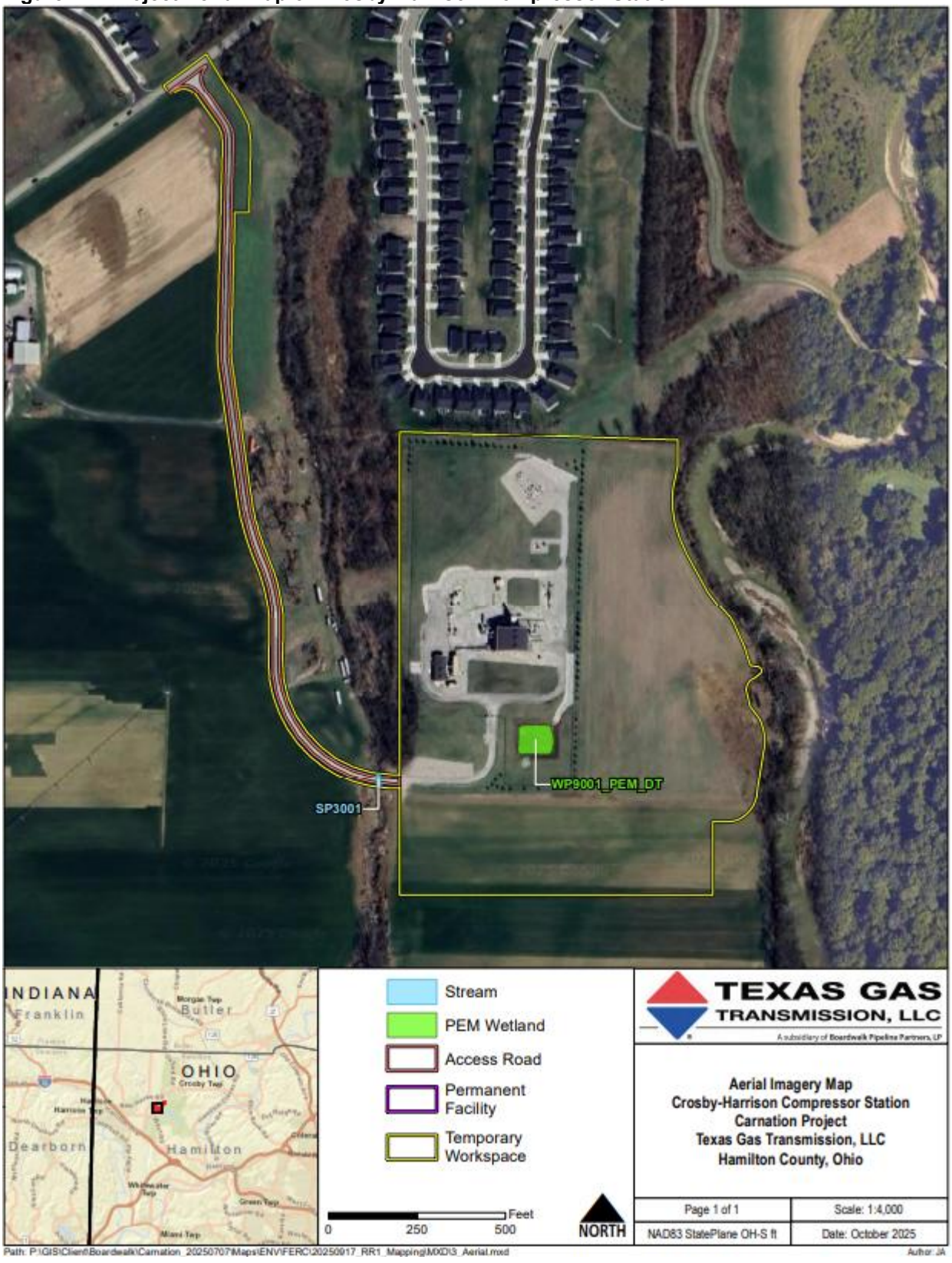
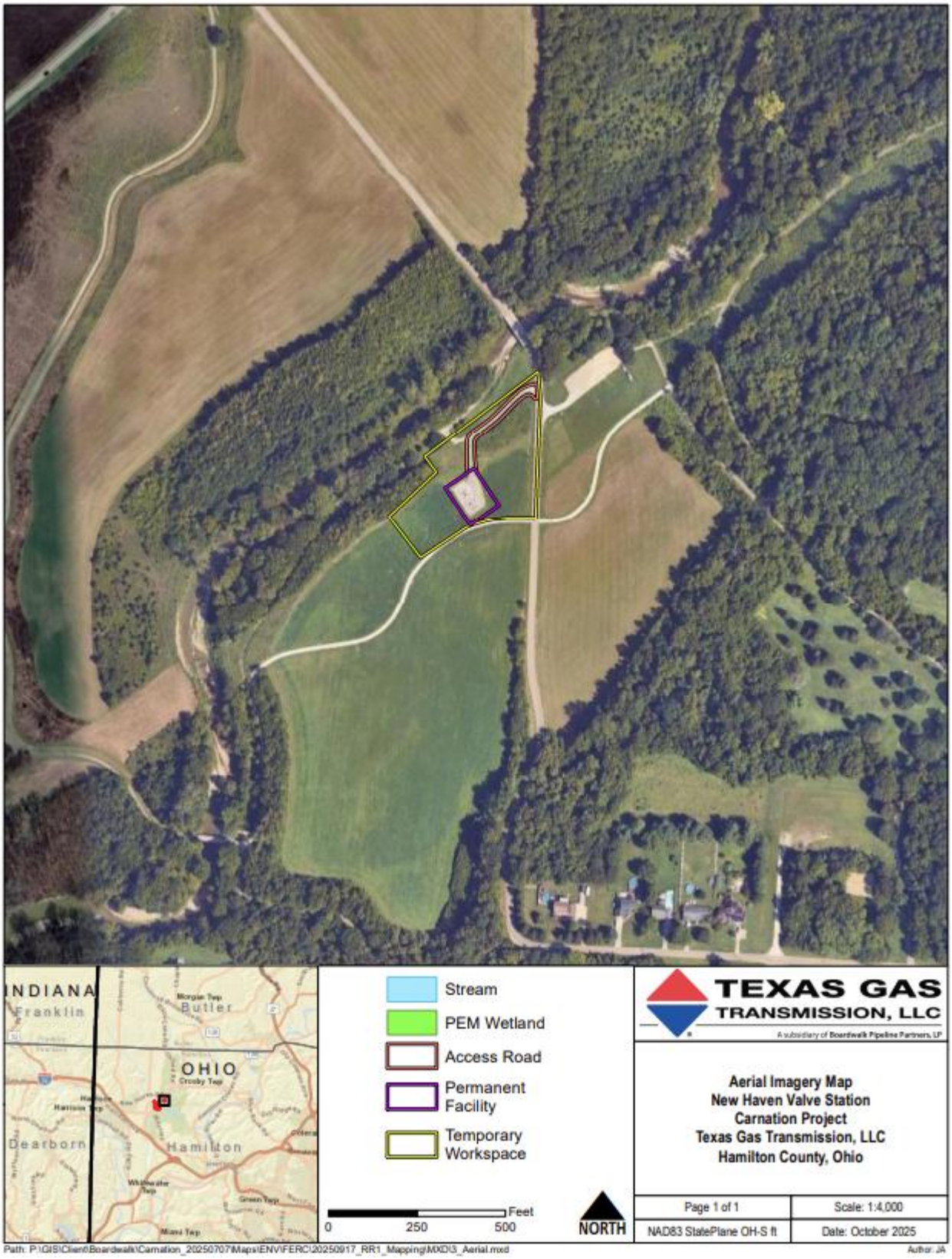


Figure A-3 Project Aerial Map of New Haven Valve Station



A.6 LAND REQUIREMENTS

Constructing the Project would require the use of about 32.1 acres of land.[6] Of these 32.1 acres, only 0.3 acre of land would be permanently used for operations. Existing access roads and public roads would be used to modify and construct the proposed facilities. Temporarily affected lands would be restored to the extent practical and allowed to revert to preconstruction conditions and uses.

At the Crosby-Harrison Compressor Station, Texas Gas would utilize the entirety of its existing 11.0-acre site plus 18.5 acres of additional temporary workspace abutting the site to the east and south.[7] In total, 28.5-acres of land would be required to modify, construct, and operate the compression facilities at the Crosby-Harrison Compressor Station. About one acre of land would be used for access roads. Modifications to the Crosby-Harrison Compressor Station would not result in the expansion of the existing fence line and would not require permanent use of additional lands.

At the New Haven Regulators Facility site, Texas Gas would require the use of about 2.4 acres of land including about 0.2 acre of land for access roads.[8] Following construction, Texas Gas would permanently maintain an additional 0.3 acre of land beyond the existing facility to maintain and operate the modified regulators.

A.7 CONSTRUCTION SCHEDULE AND WORKFORCE

Texas Gas plans to commence construction of the Project during the fourth quarter of 2026 pending receipt of necessary permits and authorizations. Construction is generally anticipated to occur Monday through Saturday between the hours of 7:00 a.m. and 7:00 p.m. for about 11 months. Additionally, Texas Gas may need to conduct construction activities beyond typical work hours, on Sundays, and on holidays depending on contractor schedule requirements. Nighttime construction activities may include welding bore utility piping, installing small bore piping, electrical and instrumental work, torquing of flanges, and hydrostatic testing. Texas Gas estimates that the Project would require about 100 workers during peak construction. Texas Gas estimates that 10 to 15 percent of the construction workers would consist of local residents.

A.8 CONSTRUCTION PROCEDURES

The Project would be designed, constructed, tested, operated, and maintained in accordance with the U.S. Department of Transportation (DOT) regulations in Title 42 CFR Part 192, *Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards,* and other applicable federal and state regulations. To avoid, reduce, and mitigate construction effects, Texas Gas would implement the FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) and *Wetland and Waterbody Construction and Mitigation Procedures*

[6] Texas Gas October 31, 2025, Application, Resource Report 1, page 3, FERC eLibrary Accession No. 20251031-5314.
[7] Texas Gas October 31, 2025, Application, Resource Report 8, page 4, FERC eLibrary Accession No. 20251031-5314.
[8] Texas Gas October 31, 2025, Application, Resource Report 8, page 4, FERC eLibrary Accession No. 20251031-5314.

(Procedures)[9]. In addition to the FERC Plan and Procedures, several other project-specific plans would be implemented to reduce environmental effects including Texas Gas' Stormwater Pollution Prevention Plan (SWPPP)[10], Spill Prevention, Response and Procedures Plan (SPRPP)[11], and Plan for the Unanticipated Discovery of Contaminated Environmental Media.[12]

Constructing the Project would involve clearing and grading, staking workspace boundaries, aboveground facility construction, pipeline installation via trenching, installation of aboveground piping, and restoration of temporarily affected lands. Following construction and prior to placing the facilities into service, all gas piping components would be hydrostatically tested. Cleared vegetation and excess soil would be disposed of or used on site or at an approved offsite location. Other excess materials generated during construction activities would be disposed of at appropriate facilities. All construction workspaces not otherwise occupied by the Project's permanent facility footprints would be restored in accordance with the FERC Plan and Procedures, and Texas Gas' Project-Specific Revegetation Plan.[13]

Texas Gas would conduct safety and environmental compliance training for its field construction personnel and contractor personnel prior to construction and as necessary during construction. The training would focus on compliance with all appliable environmental mitigation measures. Texas Gas would also employ at least one full-time environmental inspection (EI). The EI would have the authority to enforce permit conditions and ensure compliance with the FERC Plan and Procedures. In addition, FERC staff would maintain compliance oversight of the Project throughout construction and restoration.

A.9 NON-JURISDICTIONAL FACILITIES

Under Section 7 of the NGA, and as part of the decision regarding whether to approve facilities under its jurisdiction, the Commission is required to consider all factors bearing on the public convenience and necessity. Occasionally, proposed projects have associated facilities that do not come under the jurisdiction of the FERC. These non-jurisdictional facilities may be integral to the need for the proposed facilities, or they may be merely associated as minor components of jurisdictional facilities that would be constructed and operated as a result of authorization of the proposed facilities.

In its application, Texas Gas identified one non-jurisdictional facility associated with the Project. An electric transformer located within the Crosby-Harrison Compressor Station would need to be replaced with a larger transformer to accommodate the proposed facilities. The electric transformer replacement would be designed and installed in coordination with the local utility provider.

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[9] The FERC Plan and Procedures are a set of baseline construction and mitigation measures developed to minimize the potential environmental impacts of construction on upland areas, wetlands, and waterbodies. They can be viewed on the FERC Internet website at: http://www.ferc.gov/industries/gas/enviro/plan.pdf and http://www.ferc.gov/industries/gas/enviro/procedures.pdf

[10] Texas Gas October 31, 2025, Application, at Appendix 1B. eLibrary Accession No. 20251031-5314.

[11] Texas Gas October 31, 2025, Application, at Appendix 1B. eLibrary Accession No. 20251031-5314.

[12] Texas Gas October 31, 2025, Application, at Appendix 1B. eLibrary Accession No. 20251031-5314.

[13] Texas Gas October 31, 2025, Application, at Appendix 1B. eLibrary Accession No. 20251031-5314.

A.10 PERMITS, APPROVALS, AND REGULATORY CONSULTATIONS

Table A-1 lists the major federal, state, and local permits, approvals, and consultations for the Project activities and provides the current status of each. Texas Gas would be responsible for obtaining and abiding by all permits and approvals required for the Project regardless of whether they appear in the table.

Table A-1 Consultations, Permits, and Approvals

Agency	Permit/Approval	Status
Federal		
Federal Energy Regulatory Commission	Certificate of Public Convenience and Necessity and Authorization	Application filed October 2025.
U.S. Fish and Wildlife Service – Ohio Field Office	Endangered Species Act (16 U.S.C 1531-1544) Consultation and Migratory Bird Treaty Act (16 U.S.C. 703-712) Coordination	Correspondence concurring with the determinations received on November 18, 2025.
State		
Ohio State Historic Preservation Office (SHPO)	National Historic Preservation Act, Section 106 Consultation	SHPO concurred that the Project would have *no effect on historic properties* on February 13, 2026.
Ohio Department of Natural Resources Division of Wildlife	Rare, Threatened and Endangered Species Consultation	Correspondence received on November 25, 2025.
Ohio Environmental Protection Agency	National Pollutant Discharge Elimination System General Permit for Discharges of Hydrostatic Test Water	Application pending submittal.
	Clean Air Act, Minor Source Permit	Application submitted on October 31, 2025.

SECTION B – ENVIRONMENTAL ANALYSIS

This section of the EA describes the affected environment as it currently exists and discusses the environmental consequences of the proposed Project. The environmental consequences of constructing and operating the proposed pipelines would vary in duration and would include temporary, short-term, long-term, and permanent effects. Temporary effects generally occur during construction with the resource returning to a similar condition to that prior to construction, almost immediately following construction activities. Short-term effects could continue for up to 3 years following construction. Effects would be considered long-term if the resource required more than 3 years to recover. A permanent effect could occur because of any activity that modifies a resource to the extent that it would be affected for the life of the Project. When determining the significance of an effect, we consider the duration of the effect as well as the geographic, biological, and/or social context in which the effects would occur, and the intensity (e.g., severity) of the effect(s).

The analysis contained in this EA is based upon Texas Gas' application and supplemental filings. However, if the Project is approved and proceeds to the construction phase, it is not uncommon for a project proponent to require modifications (e.g., minor changes in workspace configurations). These changes are often identified by a company once on-the-ground implementation work is initiated. Any Project modifications would be subject to review and approval by the Commission and any other permitting/authorizing agencies with jurisdiction.

B.1 GEOLOGY

The Project would be located within the Interior Plains section of the Central Lowlands physiographic province (USGS, 2023). The Central Lowlands physiographic province is characterized by a low-relief surface formed by glacial till, outwash plains, and glacial-lake plains (USGS, 1995). It consists of both unconsolidated sand and gravel deposits of Quaternary age, and consolidated sandstone, limestone, and dolomite of Paleozoic age. In general, the topography across the Project area is flat with moderate sloping.

Mineral Resources

There are no oil and gas wells within one mile of the Project area. One sand and gravel quarry is located about a mile from the Crosby-Harrison Compressor Station Given the limited scope of the Project, we conclude that the Project would not affect mineral resources.

Geologic Hazards

Geologic hazards are conditions or phenomena that present a potential risk to life and/or property and are either naturally occurring or man-made. Examples of geological hazards include seismic risk and active faults, landslides (steep slopes and side slopes), karst topography and land subsidence, flash flooding, and mining hazards. Based on our review of the Project, we have determined that seismic risk and active faults, landslides, flash flooding, and subsidence are not likely to occur due to Project area specific conditions and these potential hazards are not addressed further.

Karst Terrain and Subsidence

Karst terrain results from the dissolution of highly soluble bedrock, such as limestone and dolomite. Land subsidence is the sinking of the earth's surface, either gradually or suddenly, due to subsurface movement of materials such as water or soil. Areas with karst terrain may be more susceptible to subsidence events, as are areas where there is aquifer system compaction, drainage of organic soils, underground mining, or thawing permafrost (Galloway et al., 2005).
The Project is located over interbedded limestone and shale and is approximately four miles from an area where known karst terrain exists (USGS, 2004). There are no documented sinkholes within one mile of the Project area (Applegate, 2003). In the event of an unanticipated discovery during construction, Texas Gas would implement best management practices and mitigation measures to reduce potential effects to karst.[14] Mitigation measures for karst areas would include conducting pre-construction surveys to identify sensitive features such as sinkholes and caves, fencing off or marking these features to prevent disturbance, and modifying construction techniques to minimize ground disturbance. Therefore, we conclude that the probability of the Project to be affected by a sudden surface collapse would not be significant.

B.2 SOILS

At the Crosby-Harrison compressor station most soils are upland soils derived from glacial sediments. While the lower parts of these soils may vary, many (e.g. Martinsville, Eldean) are mantled with loess-derived loams and silt loams. The New Haven Regulator Station lies on a floodplain (e.g. Genesee loam). All soils have moderate compaction potential and moderate or greater susceptibility to rutting. Most are considered prime farmland. Stony/rocky soils and soils with moderate shrink-swell activity may be encountered.

Constructing and operating the Project would temporarily and permanently affect soils. The use of lands to stage equipment and personnel could result in compaction and rutting, increased erosion potentials, and reduced revegetation rates. These effects could be exacerbated by wet weather and saturated soil conditions. Additionally, ground disturbance could result in the mixing of topsoil and subsoil and dust should excessive dry conditions persist. Prime farmland and soils supporting agricultural activities could also experience these soils effects. Agricultural effects are addressed in subsequent sections of this analysis.

To avoid, reduce, and mitigate effects on soils, Texas Gas would implement industry best management practices, monitor soil conditions, segregate soils, place construction mats within workspaces, and install erosion control devices. As needed, Texas Gas would also implement other measures described in our Plan including removing excess rock.

If contaminated media is discovered during construction, Texas Gas would implement its Plan for the Unanticipated Discovery of Contaminated Environmental Media and adhere to all applicable federal, state, and local regulations. The plan identifies the steps to be followed if contaminated sediments or soils, as identified by evidence of subsoil discoloration, odor, sheen, or other such indicators, are encountered during construction. During construction, accidental spills or leaks of fuels, lubricants, and coolants could contaminate soils. Texas Gas would follow

[14] See Texas Gas February 19, 2026, Supplemental Information, FERC eLibrary Accession No. 20260219-5113.

its SPRPP to ensure that spills are contained, cleaned up, and disposed of properly. Therefore, we conclude that the Project's effect on soils would not be significant.

B.3 WATER RESOURCES AND WETLANDS

Groundwater

According to the U.S. Environmental Protection Agency (USEPA), the Project area is underlain by the Great Miami Buried Valley Aquifer, which is designated as a sole source aquifer (USEPA, 2025a). A sole source aquifer supplies 50 percent or more of the drinking water for an area and for which there are no reasonably available alternative sources should the aquifer become contaminated. The Great Miami Buried Valley Aquifer is composed of highly permeable deposits of sand and gravel that reach thicknesses of 200 feet with a maximum capacity of 1.5 trillion gallons of groundwater (MCD, 2025).

There is one water well located within the Crosby-Harrison Compressor Station fence line that is owned and utilized by Texas Gas. No other wells, springs, or wellhead protection areas occur within one mile of Project workspaces.

Constructing and operating the proposed facilities would require shallow excavations that are unlikely to affect underlying groundwater. Additionally, the construction of new aboveground facilities and the loss of permeable land would be relatively minor and would not measurably affect groundwater infiltration. Inadvertent releases of construction vehicle and equipment fluids could adversely affect groundwater; however, Texas Gas would have in-place numerous measures as outlined in its SPRPP to prevent and contain accidental spills of any material that may contaminate soils and groundwater, and to ensure that inadvertent spills of fuels, lubricants, or coolants are contained, cleaned up, and disposed of in an appropriate manner.

The Haven Park West Mobile Home Park is located 0.4-mile northeast of the New Haven Regulators and has recorded violations of its individual National Pollutant Discharge Elimination System permit waste discharge limit in nine of the previous 13 quarters, including the last eight consecutive quarters. Waste exceedances included oxygen, nitrogen, and total dissolved solids (USEPA, 2025c). Surface water discharged with these pollutants could leach into groundwater and result in contamination. If unidentified groundwater contamination is encountered during construction of the Project, Texas Gas would adhere to its Plan for Unanticipated Discovery of Contaminated Environmental Media.[15] The plan identifies steps to be followed if contaminated groundwater, as identified by evidence of odor, sheen, or other such indicators, is encountered during construction.

Based on the scope of the Project and due to the maximum construction depth being less than the anticipated groundwater depth, we conclude that with the implementation of appropriate mitigation measures as described above, the Project's effects on groundwater would not be significant.

[15] Texas Gas October 31, 2025, Application, at Appendix 1B, FERC eLibrary Accession No. 20251031-5314.

Water Use

Hydrostatic testing of the proposed facilities would require the use of about 40,000 gallons of water.[16] This water would be obtained from a municipal source or the existing Texas Gas owned well at the Crosby-Harrison Compressor Station. Texas Gas does not plan to use hydrostatic test water additives. Following the completion of testing, Texas Gas would discharge the water into a well-vegetated upland area and would pass the water through an energy-dissipation and/or filtration device to reduce potential for scouring and erosion. Texas Gas would also use a 500-gallon water truck, as needed, for dust suppression.[17] Given the limited amount of water required for hydrostatic testing and dust suppression, we conclude that the Project would not have a significant effect on water use and availability in the Project area.

Surface Water Resources and Wetlands

The existing access road leading to the Crosby-Harrison Compressor Station spans one minor waterbody. No modifications to the access road bridge and culvert are proposed. Additionally, a 0.2-acre stormwater pond is located within the boundaries of the Crosby-Harrison Compressor Station. This pond has also been delineated as a palustrine emergent wetland.[18] This pond would be avoided during construction. Further, to ensure Project-related activities do not adversely affect these waterbodies, Texas Gas would implement measures described in our Plan and Procedures which include the installation of erosion control devices and silt fence. Therefore, based on the scope of the Project, we conclude that the Project would not significantly affect surface water resources and wetlands.

B.4 VEGETATION AND WILDLIFE

Vegetation

Vegetation in the Project area consists of agricultural crops (soybeans), maintained grasses (Kentucky bluegrass and tall fescue), and ornamental trees. Constructing and operating the Project would result in the temporary and permanently clearing of vegetation. During construction, workspaces would be devoid of vegetation; however, once construction is complete, temporarily affected lands would be restored and revegetated. The installation of new aboveground facilities would result in the permanent loss of a minor amount of vegetation.

Texas Gas identified eight plant species classified as noxious or invasive within the Project area including: Johnson grass, musk thistle, curly dock, buckhorn, poison-hemlock, amur honeysuckle, Japanese stiltgrass, and Morrow's honeysuckle. Texas Gas plans to implement its Exotic and Invasive Species Control Plan to control the spread of invasive plant species[19] which includes the monitoring and selective spot treatment of existing noxious weeds.

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[16] Texas Gas October 31, 2025, Application, Resource Report 2, page 10, FERC eLibrary Accession No. 20251031-5314.
[17] Texas Gas October 31, 2025, Application, Resource Report 2, page 10, FERC eLibrary Accession No. 20251031-5314.
[18] Texas Gas October 31, 2025, Application, Resource Report 2, page 12, FERC eLibrary Accession No. 20251031-5314.
[19] Texas Gas October 31, 2025, Application, at Appendix 1B. eLibrary Accession No. 20251031-5314.

Given the limited scope of the Project, Texas Gas' implementation of the FERC's Plan, its Revegetation Plan, and minimization measures to prevent the spread of invasive species, we conclude that the Project's effects on vegetation would be minor and not significant.

Wildlife

As described previously, construction activities would occur within the fenced boundaries of existing facilities and on lands adjacent to these facilities. Wildlife occurring in these areas is accustomed to and tolerant of energy infrastructure, agricultural operations, and other disturbances.

Constructing the Project would disturb the surrounding environment, temporarily increasing the rates of stress, injury, and mortality experienced by wildlife. However, because wildlife occurring in the Project area is accustomed to disturbance and can seek shelter in nearby habitats, we conclude that constructing and operating the Project would not significantly affect wildlife.

Migratory Birds

Migratory birds are protected under the Migratory Bird Treaty Act (MBTA) (16 U.S Code 703-711); bald and golden eagles are additionally protected under the Bald and Golden Eagle Protection Act (16 U.SC. 668-668d). Executive Order 13186 (66 FR 3853) directs federal agencies to identify where unintentional take is likely to have a measurable negative effect on migratory bird populations and to avoid or minimize adverse effects on migratory birds through enhanced collaboration with the U.S. Fish and Wildlife Service (USFWS). On March 30, 2011, the USFWS and the Commission entered into a Memorandum of Understanding that focuses on avoiding, minimizing, or mitigating adverse effects on migratory birds and strengthening migratory bird conservation through enhanced collaboration.

Constructing the Project has the potential to affect birds protected under the MBTA, including bald and golden eagles. General effects on migratory birds from construction and operation of the Project would be similar to those described for wildlife. Individuals potentially present in the Project area during construction may temporarily relocate to similar adjacent areas due to increased noise but are expected to return. Additionally, the Project may result in the mortality of eggs and/or young immature birds that are not able to avoid active construction.

Although the provisions of the MBTA are applicable throughout the entire year, most migratory bird nesting activity in the region occurs between May 15 and August 15. Texas Gas anticipates conducting vegetative and tree clearing outside the migratory bird nesting season.[20] However, some clearing may occur during the nesting season. Nighttime effects due to construction noise and light are not anticipated.

Bald and golden eagles are protected under both the MBTA and the Bald and Golden Eagle Protection Act. Based on the Ohio Department of Natural Resources (ODNR) occurrence

[20] Texas Gas February 5, 2026, Data Response, eLibrary Accession No 20260219-5113.

data, there are no nesting bald eagles confirmed in the vicinity of the Project. The closest confirmed bald eagle nesting site occurs about 3 miles southwest of the Project area. In the event that a bald eagle is encountered during construction, Texas Gas would consult with the USFWS.[21]

Based on the limited scope of the Project, the duration of Project construction, and the absence of bald eagle and its nests in the vicinity of the Project workspace, we conclude that although individual birds or bird habitats could be affected by the Project, we do not expect population-level impacts on migratory birds or significant measurable negative impacts on any migratory bird species or their habitat.

Federally Listed Threatened and Endangered Species

Federal agencies are required under Section 7 of the Endangered Species Act to ensure that any actions authorized, funded, or carried out by the agency would not jeopardize the continued existence of a federally listed endangered or threatened species, or result in the destruction or adverse modification of the designated critical habitat of a federally listed species. As the lead federal agency authorizing the Project, the FERC is required to consult with the USFWS to determine whether federally listed endangered or threatened species or designated critical habitat are found in the vicinity of the Project, and to evaluate the proposed action's potential effects on those species and/or critical habitats.

Federally listed species with the potential to occur in the Project area include the Indiana bat (*Myotis sodalist*, endangered), northern long-eared bat (*Myotis septentrionalis*, endangered), tricolored bat (*Perimyotis subflavus*, proposed endangered), whooping crane (*Grus americana*, experimental population, non-essential), American burying beetle (*Nicrophorus americanus*, threatened), and monarch butterfly (*Danaus plexippus*, proposed threatened).

Texas Gas, acting as FERC's non-federal representative for the purpose of complying with Section 7(a)(2) of the ESA, initiated informal consultation with the USFWS on October 13, 2025, for the Indiana bat. On February 11, 2026, the USFWS concurred with Texas Gas' determination that the Project *may affect but is not likely to adversely affect* the Indiana bat.[22] The USFWS' Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key ran by Texas Gas on August 7, 2025, resulted in determinations of *no effect* for both the northern long-eared bat and tricolored bat.[23] In its February 11, 2026, correspondence with Texas Gas, the USFWS also concurred with the *no effect* determinations. Texas Gas completed the USFWS Determination Key for the American Burying Beetle which determined that the Project *may affect* the American burying beetle.[24] On September 18, 2025, the USFWS indicated that the Project is consistent with the activities analyzed in its October 15, 2020, Programmatic Biological Opinion and is excepted from incidental take. Furthermore, the Project *may affect but is not likely to jeopardize the continued existence* of the whooping crane and monarch butterfly.

[21] Texas Gas February 5, 2026, Data Response, eLibrary Accession No 20260219-5113.
[22] Texas Gas February 5, 2026, Data Response, Attachment 1, eLibrary Accession No 20260219-5113.
[23] Texas Gas October 31, 2025, Application, at Appendix 3B. eLibrary Accession No. 20251031-5314.
[24] Texas Gas October 31, 2025, Application, at Appendix 3B. eLibrary Accession No. 20251031-5314.

No further consultation is needed for the whooping crane and monarch butterfly. Consultation under Section 7 of the ESA is complete.

State-Listed Species

Several state-listed species may be located in the Project area. State protected species that are not also federally protected and addressed above include the cave salamander, American bittern, barn owl, and bat buffer. However, based on our review of the Project and due to insufficient habitat, we conclude that no effects to the cave salamander, American bitten, barn owl, and bat buffer are expected.

B.5 LAND USE AND VISUAL RESOURCES

Land Use

Lands affected by the Project are used for industrial, agricultural, and recreational purposes. Adjacent lands are also used for residential and natural/recreational purposes. At the Crosby-Harrison Compressor Station, ground disturbance and the installation of new aboveground facilities would all occur within the fenced boundaries of the existing industrial site. To support this work, adjacent agricultural lands would be used for equipment and materials storage and staging. At the New Havens Regulators site, ground disturbance and the installation of new aboveground facilities and piping would occur within and adjacent to the existing industrial site. Adjacent lands are used for agricultural (hayfield) and recreational purposes. Table B-1 is a summary of land use acreages affected by construction and operation of the Project.

Lands within the fenced boundaries of the Crosby-Harrison Compressor Station and the New Havens Regulators site are considered industrial. Although, portions of these sites consist of maintained herbaceous landscapes, these lands are used to support the operation of natural gas transmission infrastructure. Agricultural lands affected by the Project were used in the past to produce soybeans, but are now primarily hayfields, and are often left fallow. The fallow lands abutting the New Havens Regulators site also support recreational activities. The New Havens Regulators site is located within a locally designated scenic area, the Miami Whitewater Forest Park, managed by Great Parks of Hamilton County. The Miami Whitewater Forest Park offers numerous recreational activities including camping, hiking, bird watching, disc golf, golf, and access to kayaking/paddling. The Shaker Trace Loop Trail, which is a 7.7-mile-long multi-use (walk, run, bike, horseback riding) trail that provides access to nearby natural areas and an associated parking lot is located adjacent to the New Havens Regulators site. The Vistas at Westhaven residential subdivision which consists of over 100 single family homes abuts the Crosby-Harrison Compressor Station site. Nine residences are located within 150 feet of the compressor station fenceline, and the closest residential property to the compressor station construction workspace would be about 41 feet.[25] We note the existing compressor station predates the adjacent housing development.

[25] Texas Gas October 31, 2025 Application, Resource Report 8 at pg 8-6.

Constructing and operating the Project would temporarily affect land uses at and near the Crosby-Harrison Compressor Station. Industrial lands within the fenced boundaries of the site would be unaffected as they support existing station operations. The agricultural lands abutting the site and used for equipment and materials storage and staging would be temporarily unavailable for use during construction. However, this disruption to land use would likely be minor based on a review of aerial imagery which indicates that these lands have been fallow for several years. Construction activities would be noticeable to residents within the Vistas at Westhaven residential subdivision due to the general disturbance caused by an increase in vehicle traffic and construction equipment use, increased noise, and dust. Noise and dust are addressed further in subsequent sections of this analysis. These effects would be felt acutely by the nearest residences and would dissipate with distance. Residents would likely find these effects inconvenient and an annoyance; however, these effects would be temporary and would largely cease following construction. Constructing and operating the proposed facilities at the Crosby-Harrison Compressor Station would not result in any permanent changes to land use.

Constructing and operating the Project would temporarily and permanently affect land use at the New Havens Regulators site. The existing site would be expanded resulting in the permanent conversion of fallow agricultural land to industrial land. The site would be expanded by 0.3 acre to accommodate the expanded fenceline.[26] Construction activities including increased vehicle traffic and equipment use (and the resulting air and noise emissions), and ground disturbance at the site would likely be considered by recreational users of the Shaker Trace Trail and other nearby recreational resources as an adverse effect and some may forgo use of the area during construction. Construction activities could also deter equestrian use of the area. Individually or combined, these effects would likely decrease the quality of the individual user experience. However, these effects would be temporary and would cease once construction is complete. To avoid, reduce, and mitigate the Project's temporary effects on recreational users of the Project area, Texas Gas has stated that it is working with Hamilton County officials to identify measures to minimize effects on visitors during construction.

Following construction, affected lands would be restored and revegetated and with the exception of 0.3 acre of land adjacent to the New Havens Regulators, pre-construction land use would resume.[27] We anticipate adverse effects to recreational users during construction activities; however, given the minor scope and temporary nature of project activities, we conclude such effects would not be significant.

[26] Texas Gas October 31, 2025 Application, Resource Report 1, pg 1-4.
[27] *Id.*

Table B-1 Summary of Land Use for the Project (acres)

Facility	Agricultural		Forest		Open Land		Industrial		Wetlands		Project Total	
	Const. [a]	Op. [b]	Const. [a]	Op. [b]	Const. [a]	Op. [b]	Const. [a]	Op. [b]	Const. [a]	Op. [b]	Const. [a]	Op. [b]
Crosby-Harrison Compressor Station												
Crosby-Harrison Compressor Station	14.74	0.00	0.30 [c]	0.00	8.65	0.00	4.61	0.00	0.18 [c]	0.00	**28.48**	**0.00**
Access Roads	0.00	0.00	0.00	0.00	0.21	0.00	0.85	0.00	0.00	0.00	**1.06**	**0.00**
Crosby-Harrison Compressor Station Subtotal	**14.74**	**0.00**	**0.30**	**0.00**	**8.86**	**0.00**	**5.46**	**0.00**	**0.18**	**0.00**	**29.54**	**0.00**
New Haven Regulators												
New Regulators and Associated Piping	0.00	0.00	0.00	0.00	2.16	0.13	0.26	0.16	0.00	0.00	**2.42**	**0.29**
Access Roads	0.00	0.00	0.00	0.00	0.08	0.00	0.09	0.00	0.00	0.00	**0.17**	**0.00**
New Haven Regulators Subtotal	**0.00**	**0.00**	**0.00**	**0.00**	**2.24**	**0.13**	**0.35**	**0.16**	**0.00**	**0.00**	**2.59**	**0.29**
Project Total	**14.74**	**0.00**	**0.30** [c]	**0.00**	**11.10**	**0.13**	**5.81**	**0.16**	**0.18** [c]	**0.00**	**32.13**	**0.29**

[a] Land affected during construction is inclusive of operational impacts (permanent).
[b] Land affected during operation consists only of new permanent impacts.
[c] Land use is within the Project workspace but will be avoided and not impacted during construction.
Source: Texas Gas October 31, 2025, Application, Resource Report 8, page 4, FERC eLibrary Accession No. 20251031-5314.

Visual Resources

Project-related activities would temporarily and permanently affect the visual character of the area. The use of construction vehicles and equipment and the construction activities themselves would be visible to residents of the Vistas at Westhaven subdivision and recreational users of the Shaker Trace Trail. These activities may also be visible to individuals traversing the area and recreational users in the vicinity of the Project. Construction effects would be temporary and thus their effects on visual resources would be temporary and relatively minor.

The new facilities at the New Havens Regulator site would be consistent with the existing facilities; however, we find the existing site does not comply with visual screening requirements of the Commission's regulations. The regulator site is within a locally designated scenic area and currently has no visual screening. Commission regulations at 18 CFR 380.15(e)(2) address the siting of facilities in officially designated parks, scenic, and recreational areas, noting that applicants should minimize visibility from areas of public view and preserve the character and existing environment of the area. Furthermore, 18 CFR 380.15(g)(5) requires aboveground facilities which are visible from public areas should be planted in trees and shrubs, or other appropriate landscaping to enhance the appearance of the facilities. To ensure visual effects are appropriately minimized in compliance with the Commission's siting regulations, **we recommend that any Commission Order approving the Project include a mandatory condition requiring Texas Gas to develop a visual screening plan in consultation with Great Parks of Hamilton County and file that plan for our review and approval, prior to construction** (see Section D, recommended condition no. 12).

New aboveground facilities and equipment at the Crosby-Harrison Compressor Station would be consistent with the visual character of the site and as a result the permanent effects to the visual character of the area would be minor. Additionally, Texas Gas would replace any damaged or removed trees along the compressor station's north side boundary facing the Vistas at Westhaven subdivision following the completion of construction activities to preserve the existing visual screening.

Given the minimal permanent effects to land use and with the implementation of our recommendation requiring a visual screening plan at the New Havens Regulator site, we conclude that construction and operating the Project would not result in a significant effect on these resources.

B.6 CULTURAL RESOURCES

Section 106 of the National Historic Preservation Act, as amended, requires the FERC to consider the effects of its undertakings on properties on or eligible for listing on the National Register of Historic Places (NRHP) and to afford the Advisory Council on Historic Preservation an opportunity to comment. Texas Gas, as a non-federal party, is assisting us in meeting our obligations under Section 106 and implementing regulations at 36 CFR Part 800.

Texas Gas completed Phase I cultural resources investigations for the Project and provided the results to the FERC and the Ohio State Historic Preservation Office (SHPO). The area of potential effects (APE) totals 32.1 acres[28], of which 29.5 acres were previously investigated and not re-surveyed for this Project.[29] The remaining 2.6 acres comprise the expansion of the existing New Haven Regulators site. As Project construction would be within or adjacent to existing facilities, the APE for visual effects was not investigated.

Previous investigations identified three archaeological sites within the APE; all were recommended not eligible for the NRHP.[30] Further investigations identified one archaeological site and two isolated finds.[31] These resources were recommended as not eligible for the NRHP by Texas Gas. In a letter dated February 13, 2026, the Ohio SHPO concurred that there would be no historic properties affected within the Project APE. We agree.

On October 31, 2025, Texas Gas contacted the following Native American Tribes, providing a Project description and mapping: Eastern Shawnee Tribe of Oklahoma, Miami Tribe of Oklahoma, Osage Nation, and the Seneca-Cayuga Nation. To date, no comments or responses have been received.

Texas Gas provided a Plan for the Unanticipated Discovery of Cultural Resources and Human Remains to address the unanticipated discovery of historic properties and human remains during construction. We requested a minor revision of the plan to include the contact

[28] Texas Gas October 31, 2025, Resource Report 4 at 4.2.1, FERC Accession No. 20251031-5314.
[29] Texas Gas October 31, 2025, Resource Report 4 at 4.2.2, FERC Accession No. 20251031-5314.
[30] *Ibid*
[31] Texas Gas December 15, 2025, Supplemental Cultural Resources Survey Report at 1, FERC Accession No. 20251215-5240.

information of the FERC archeologist. Texas Gas provided a revised plan which we find acceptable.[32]

FERC's compliance requirements with Section 106 for the Project have been completed.

B.7 AIR QUALITY

The term "air quality" refers to relative concentrations of pollutants in the ambient air. Air quality would be affected by construction and operation of the Project. This section summarizes federal and state air quality regulations that are applicable to the proposed facilities. This section also characterizes the existing air quality and discloses potential effects the facilities may have on air quality regionally and locally.

Federal and state air quality standards are designed to protect human health. The U.S. Environmental Protection Agency (USEPA) has developed National Ambient Air Quality Standards (NAAQS) for criteria air pollutants such as oxides of nitrogen (NO_x) and carbon monoxide (CO), sulfur dioxide (SO_2), and inhalable particulate matter ($PM_{2.5}$ and PM_{10}). $PM_{2.5}$ includes particles with an aerodynamic diameter less than or equal to 2.5 micrometers, and PM_{10} includes particles with an aerodynamic diameter less than or equal to 10 micrometers. The NAAQS were set at levels the USEPA believes are necessary to protect human health and welfare. Volatile organic compounds (VOC) are regulated by USEPA mostly to prevent the formation of ozone, a constituent of photochemical smog. Many VOCs form ground-level ozone by reacting with sources of oxygen molecules such as NO_x in the atmosphere in the presence of sunlight. NO_x and VOCs are referred to as ozone precursors. Hazardous air pollutants (HAP) are also emitted during fossil fuel combustion and are suspected or known to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects.

The USEPA defines air pollution to include the mix of the following six long-lived greenhouse gases (GHG): carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHGs produced by fossil-fuel combustion are CO_2, CH_4, and N_2O, and are generally non-toxic and non-hazardous at normal ambient concentrations. GHGs' status as a pollutant is not related to toxicity, as they are nonhazardous to health at normal ambient concentrations, but is due to the ability of GHGs to absorb infrared radiation, trapping heat in the atmosphere and making the planet warmer. Emissions of GHGs are quantified and regulated in units of carbon dioxide equivalent (CO_2e). The CO_2e unit of measure factors in the global warming potential of each GHG over a specified timeframe. There are no NAAQS for GHGs.

If measured ambient air pollutant concentrations for a subject area remain below the NAAQS criteria, the area is considered to be in attainment with the NAAQS. The Project would be located in Hamilton County, Ohio. Hamilton County is currently in attainment for all criteria pollutants.

[32] Texas Gas February 5, 2026, Data Response, eLibrary Accession No 20260219-5113.

Construction Emissions

During construction, a temporary reduction in ambient air quality may result from criteria pollutant emissions and fugitive dust generated by construction equipment. The quantity of fugitive dust emissions would depend on the moisture content and texture of the soils that would be disturbed. Fugitive dust and other emissions due to construction activities generally do not pose a significant increase in regional pollutant levels; however, local pollutant levels could increase. Dust suppression techniques, such as watering the right-of-way may be used as necessary in construction zones to minimize the effects of fugitive dust on sensitive areas. Project construction emissions are summarized in table B-2 below.

Table B-2 Construction Emissions in Tons

Source	NO_x	CO	SO_2	PM_{10}	PM2.5	VOC	CO_2e	Total HAP
100 Ton Crane	0.02	0.005	4.80E-05	0.001	0.001	0.001	17.57	4.70E-04
40 Ton Crane	0.021	0.005	1.30E-04	0.001	0.001	0.002	49.27	6.30E-04
20 Ton Cherry Pickers (3)	0.227	0.184	1.90E-04	0.025	0.024	0.032	64.64	1.40E-02
330 Backhoes (4)	0.044	0.009	5.10E-04	0.003	0.003	0.004	192.13	1.30E-03
D6 Bulldozers (6)	0.052	0.012	4.80E-04	0.003	0.003	0.004	182.34	1.40E-03
Rough Terrain Forklifts (2)	0.045	0.013	6.60E-05	0.002	0.002	0.001	24.63	4.90E-04
Generators (4)	0.577	0.12	3.30E-04	0.019	0.018	0.034	114.77	1.70E-02
Welding Rigs (6)	0.397	0.146	2.60E-04	0.023	0.023	0.036	89.09	1.70E-02
1500 CFM Air Compressors (2)	0.086	0.023	1.40E-04	0.004	0.004	0.005	49.27	2.20E-03
Sweeper	0.022	0.002	3.80E-05	0	0	0	14.35	1.30E-04
Commuter Vehicles (20)	0.007	0.075	2.90E-04	1.80E-04	1.70E-04	0.002	28.89	1.00E-03
Gasoline Pickup Trucks (10)	0.023	0.1	3.90E-04	1.20E-04	1.10E-04	0.005	39.03	6.90E-04
Diesel Pickup Trucks (10)	0.183	0.044	2.60E-04	0.002	0.002	0.009	26.83	7.70E-04
Heavy Duty Semi Trucks (28)	0.119	0.025	8.60E-04	5.50E-04	5.30E-04	0.005	90.86	3.00E-03
Fugitive Dust-Paved Roads	--	--	--	0.752	0.185	--	--	--
Site Preparation	--	--	--	1.463	0.084	--	--	--
Project Totals	**1.82**	**0.76**	**0.004**	**2.3**	**0.35**	**0.14**	**983.67**	**0.06**
Source: Texas Gas, October 31, 2025, Application, Appendix 9E, Table 2, FERC Accession No. 20251031-5314								

Given the temporary nature of construction at the Crosby-Harrison Compressor Station and the New Havens Regulators site, we conclude that emissions from construction-related activities for the Project would not be expected to result in a violation of any applicable ambient air quality standard or significantly affect local or regional air quality.

Operational Emissions

Operational emissions would result from new natural gas fired equipment at the modified existing Crosby-Harrison Compressor Station, as well as the New Haven Regulators, and ancillary emission sources associated with the new emergency generator, natural gas venting, and fugitive emissions from natural gas equipment leaks. Emissions from operations are summarized in table B-3 below.

Table B-3 Operational Emissions

Emission Unit	Annual Potential Emissions (tpy)							
	NOx	**CO**	**VOC**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**	**Total GHG (CO_2e)**	**Total HAP**
Emission Units Being Added with Project								
Turbine #2 Solar Mars 100-16000S	19.41	19.7	1.7	0.25	0.16	0.1	59,912	1.409
Emergency Generator #2	0.88	1.75	0.61	0.002	0.032	0.032	756	0.225
Catalytic Fuel Gas Heater #2	0.007	4.24	0.024	0.006	-	-	413	0.001
Turbine #2 Compressor Blowdown Vent	-	-	0.44	-	-	-	903	-
New Fugitive Components	-	-	0.15	-	-	-	308	-
Emission Totals for Units Being Added	**20.29**	**25.69**	**2.92**	**0.26**	**0.2**	**0.13**	**62,292**	**1.635**
Existing Emission Units Remaining in Service								
Turbine #1 Solar Mars 100-15000S	30.79	31.24	3.58	0.24	0.16	0.096	57,198	1.345
Catalytic Fuel Gas Heater #1	0.007	4.24	0.024	0.006	-	-	413	0.004
Pipeline Distillate Storage Tank	-	-	0.29	-	-	-	12.1	0.024
Oily Water Storage Tank	-	-	5.00E-06	-	-	-	-	-
Pipeline Distillate Truck Loading	-	-	0.017	-	-	-	-	-
Turbine #1 Compressor Blowdown Vent	-	-	2.19	-	-	-	4,517	-
Existing Fugitive Components	-	-	0.151	-	-	-	312	-
Emission Totals for Units Remaining in Service	**30.8**	**35.48**	**6.25**	**0.25**	**0.16**	**0.1**	**62,453**	**1.373**
Post-Project Facility-Wide-Totals	**51.09**	**61.17**	**9.17**	**0.51**	**0.35**	**0.23**	**124,744**	**3.009**
PSD Major Source Thresholds (tpy) - Facilities Below These Thresholds Are Not Subject to PSD Review	**250**	**250**	**250**	**250**	**250**	**250**	**N/A**	**N/A**

Emission Unit	Annual Potential Emissions (tpy)							
	NOx	CO	VOC	SO_2	PM_{10}	$PM_{2.5}$	Total GHG (CO_2e)	Total HAP
Title V Major Source Thresholds (tpy) - Facilities Above These Thresholds are Required to Obtain a Title V Permit	**100**	**100**	**100**	**100**	**100**	**100**	**N/A**	**N/A**

Air Quality Modeling

Air dispersion modeling was performed for new proposed emission units at the existing Crosby-Harrison Compressor Station using the latest version of USEPA's AERMOD dispersion model (Version 24142) along with the suite of supporting programs (i.e., AERMAP and AERMET). The modeling was conducted to examine how impacts from the new proposed emission units at the Crosby-Harrison Compressor Station could affect air quality by comparing the modeled concentrations from the proposed emission units to significant impact levels (SILs) established by the USEPA.

The SILs are used to determine if the predicted maximum air concentrations from a project are significant enough to warrant further review. The maximum impact (highest high) for each pollutant and averaging period was modeled and compared to the applicable SIL. As shown in table B-4, the maximum modeled concentrations of criteria pollutants from the new components are estimated to be below the SILs.

Table B-4 Crosby-Harrison Compressor Station Air Quality Significance Dispersion Modeling Analysis

Pollutant	Averaging Period	Reported Value	Maximum Modeled Concentration (µg/m3)	Significant Impact Level (µg/m3)	Above SIL?
CO	1-hour	H1H	671.2	2,000	No
	8-hour	H1H	147.4	500	No
NO_2	1-hour	H1H	7.05	7.5	No
	Annual	H1H	0.173	1	No
PM_{10}	24-hour	H1H	0.623	5	No
$PM_{2.5}$	24-hour	H1H	0.550	1.2	No
	Annual	H1H	0.020	0.13	No
SO_2	1-hour	H1H	0.760	7.9	No

If a project's emissions are below the SIL for a pollutant and averaging period, further analysis is not required under USEPA's Guideline on Air Quality Models.[33] However, to ensure that the cumulative and local effects of the entire facility are disclosed, we are providing a conservative cumulative NAAQS analysis including both existing and proposed emission

[33] USEPA's Guideline on Air Quality Models is found under 40 CFR Part 51, Appendix W. https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/appendix-Appendix%20W%20to%20Part%2051.

sources at the compressor station. We estimated the emissions from the existing facilities at the Crosby-Harrison Compressor Station by using the results of the air dispersion modeling for the Northern Supply Access Project under Docket No. CP15-513-000, which included the original construction of the Crosby-Harrison Compressor Station (previously named the Harrison Compressor Station). The Crosby-Harrison Compressor Station was originally analyzed and modeled with two turbines. However, Texas Gas requested and received approval to vacate its Certificate, in part, for one 8,668-hp Solar Taurus 70 turbine driven compressor at the station; therefore, only one of the originally proposed turbines was constructed.[34] We recognize that the dispersion modeling under Docket CP15-513-000 overestimates the station's existing emissions as only one turbine is currently approved to operate at the Crosby-Harrison Compressor Station; therefore, our cumulative analysis below is conservative.

Table B-5 below shows the NAAQS analysis including previous modeling results under Docket CP15-513 combined with the modeling results for the proposed new turbine and ambient background in comparison to the NAAQS.

Table B-5 Crosby-Harrison Compressor Station Cumulative NAAQS Modeling

Pollutant	Averaging Time	Existing Facility Modeled Impacts [1] ($\mu g/m^3$)	Modeled Impact from new Project Turbine[2] ($\mu g/m^3$)	Ambient Air Background ($\mu g/m^3$)	Total Cumulative Impact ($\mu g/m^3$)	NAAQS ($\mu g/m^3$)
CO	1-Hour	324.6	667.7	802	1,794	40,000
	8-Hour	196.4	146.7	607	950.1	10,000
NO_2	1 hour	29.9	6.14	48.92[3]	84.39	188
	Annual	1.34	0.173	8.65	10.16	100
PM_{10}	24-Hour	2.32	0.605	77	79.9	150
$PM_{2.5}$	24-hour	1.51	0.292	17	17.19	35
	Annual	0.17	0.02	7.7	7.89	9
SO_2	1-Hour	0.35	0.754	48.24	49.34	196

1: Accession no 20150605-5200 RR9 Appendix 9B, Table 2, form of the NAAQS. Docket No. CP15-513-000 model with 2 Turbines
2: Accession No 202513031-5314, RR9, Appendix 9B, Table 9B-3, form of the NAAQS
3: Corrected data obtained from the 2024 1-hr NO_2 3 yr Design value monitor no. 210373002
NA = No current primary NAAQS for that pollutant averaging times.

The results of the air dispersion modeling assessment demonstrates that operating the proposed new emission units along with the existing unit at the Crosby-Harrison Compressor Station would be below the NAAQS for all criteria pollutants and averaging times. Therefore, the Project would not have a significant effect on air quality.

[34] FERC May 6, 2020 Order Vacating in Part Certificate Authorization re: Texas Gas Transmission, LLC under CP15-513.

B.8 NOISE

Constructing and operating the Project would affect the local noise environment in the Project area. The ambient sound level of a region, which is defined as the total noise generated within the specific environment, is usually composed of sounds emanating from both natural and artificial sources. At any location, both the magnitude and frequency of environmental noise may vary considerably over the course of the day, throughout the week, and between seasons, in part due to changing weather conditions and the effects of seasonal vegetative cover.

In 1974, the USEPA published its Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Two measurements used to relate the time-varying quality of environmental noise to its known effects on people are the 24-hour equivalent sound level (L_{eq}) and the day-night noise level (L_{dn}). The L_{eq} is an A-weighted sound level containing the same sound energy as the instantaneous sound levels measured over a specific time period. Noise levels are perceived differently depending on length of exposure and time of day. The L_{dn} accounts for the duration and time the noise is encountered. Specifically, in the calculation of the L_{dn}, late night to early morning (10:00 p.m. to 7:00 a.m.) noise exposures are penalized +10 decibels (dB) to account for people's greater sensitivity to sound during the nighttime hours. Due to the 10 dB nighttime penalty added prior to calculation of the L_{dn}, for a facility to meet the 55 A-weighted decibel (dBA) L_{dn} limit established by the USEPA to protect the public from indoor and outdoor activity interference, a facility must be designed such that the constant 24-hour noise level does not exceed an L_{eq} of 48.6 dBA at any noise-sensitive area (NSA). The A-weighted scale is used because human hearing is less sensitive to low and high frequencies than mid-range frequencies. For an essentially steady sound source that operates continuously over a 24-hour period and controls the environmental sound level, the L_{dn} is about 6.4 dB above the measured L_{eq}.

The USEPA has indicated that an L_{dn} of 55 dBA protects the public from indoor and outdoor activity interference. We have adopted this criterion and use it to evaluate the potential noise effects from the Project at Noise Sensitive Areas (NSA), such as residences, schools, or hospitals. Also, in general, a person's threshold for a perceivable change in loudness on the A-weighted scale is about 3 dBA, whereas a 6 dBA change is clearly noticeable and a 9 dBA change is perceived as either twice or half as loud.

Construction Noise

Noise would be generated during construction of the aboveground facilities for the Project. Noise levels would be highest in the immediate vicinity of construction activities and would diminish with distance from each work area. These effects would be localized and temporary. During construction activities at the compressor station and regulator, the increase in noise levels would be localized to the area around the aboveground facilities and would vary depending on the phase of construction. Typically, the highest sound levels would be associated with earthwork activities. Sound level changes would depend on the type of equipment used, the duration of use for each piece of equipment, the number of construction vehicles and machines used simultaneously, and the distance between the sound source and receptor. Construction activities associated with the Project would be performed with standard heavy

equipment such as track-excavators, backhoes, cranes, bulldozers, and dump trucks. Noise would also be generated by trucks and other light vehicles traveling in and near areas under construction. Construction equipment and worker vehicles generally operate intermittently and may change depending on Project activity or phase.

The Project facilities would be located in Hamilton County approximately three miles east of Harrison, Ohio. The area surrounding the existing Crosby-Harrison Compressor Station and New Haven Regulators site consists of a residential subdivision, fallow agricultural lands, and recreational resources including the Shaker Trace Trail and the Miami Whitewater Forest. Texas Gas anticipates that construction activities would primarily occur Monday through Saturday between the hours of 7:00 AM and 7:00 PM; however, in order to address the potential for delays associated with weather, site conditions, specialized construction techniques, emergencies, or other atypical circumstances, Texas Gas may need to conduct construction activities on Sundays, federal holidays and/or between the hours of 7:00 PM and 7:00 AM. In addition, Sunday work may be conducted based on contractor schedule requirements.

Nighttime work is not anticipated to occur at the New Haven Regulators. If Texas Gas needs to conduct nighttime work at the Crosby-Harrison Compressor Station, the activities would take place within the existing facilities and may include low-noise generating activities such as welding, installing small bore piping, electrical and instrumentation work, torquing of flanges, and hydrostatically testing. Texas Gas would minimize effects by limiting nighttime lighting, restricting equipment deliveries to daytime only, and contacting all potentially affected landowners in advance of commencing any nighttime activities.

Texas Gas representatives would coordinate with landowners prior to and during construction regarding anticipated noise. The noise from construction activities at the existing Crosby-Harrison Compressor Station and New Haven Regulators should have a minimal effect on the surrounding environment. People at nearby residences and buildings would hear the construction noise. Texas Gas would document any landowner concerns and the mitigation measures taken to address them and include the measures in the construction/environmental progress reports submitted to FERC. Overall, the effect would be temporary, and we conclude that construction noise would not have a significant effect on the surrounding area.

Operational Noise

The Project's operational noise would be generated by the proposed modifications to the existing compressor station and the new regulators. Tables B-6 and B-7 below show the operational noise estimates for the Crosby-Harrison Compressor Station and the New Haven Regulators, respectively, with implementation of recommended noise mitigation measures. As shown in table B-6, existing total noise levels at the two closest NSAs to the Crosby-Harrison Compressor Station are currently above the FERC criterion of 55 dBA L_{dn}. These residences were built along the north fence line of the compressor station after the station was placed in service in 2017. During noise surveys, it was determined that the aboveground piping for the existing mainline suction and discharge tie-ins (located near the northeast corner of the station) are the main contributor to the elevated sound levels at these NSAs. Installation of insulation on

all large bore aboveground piping at the station would reduce the modified station's total noise level at the two closest NSAs.

Noise attributable to the proposed modified compressor station and regulator facility are estimated to be below our criterion of 55 dBA L_{dn} at all nearby NSAs. However, to verify the accuracy of Texas Gas' noise estimates and ensure that noise levels due to operation of the modified compressor station and new regulators would not significantly affect nearby NSAs, **we recommend that any Commission Order approving the Project include mandatory conditions requiring Texas Gas to file noise surveys after placing the facilities into service to demonstrate that noise does not exceed an L_{dn} of 55 dBA at any nearby NSA, and to install additional noise controls if the levels are exceeded** (see section D, recommended condition nos. 13 and 14).

Table B-6 Noise Quality Analysis for the Crosby-Harrison Compressor Station Modifications

Noise Sensitive Area	Distance and Direction from Compressor Building	Existing Sound Level L_{dn} (dBA) [a]	Total Modified Sound Level L_{dn} (dBA) [b]	Potential Change in the Current Sound Level (dBA)
NSA #1 (Houses)	625 ft N	58.6	54.1	-4.5
NSA #2 (Houses)	650 ft NNW	55.3	54.1	-1.2
NSA #3 (Houses)	675 ft NW	50.1	53	2.9

[a] Measured levels during full load operation on June 12, 2025. The dominant sound at all measurement locations was due to station operation. If the station was not operating, ambient background was assumed consistent with "rural residential" which indicates a L_{dn} of 45 dBA.
[b] Estimated levels with proposed modifications.
Source: Texas Gas, October 31, 2025, Application, RR 9, Table 9.3-1, FERC Accession No. 20251031-5314

Table B-7 Noise Quality Analysis for the New Haven Regulators Modifications

Noise Sensitive Area	Distance and Direction from Modified Facilities	Existing Sound Level L_{dn} (dBA) [a]	Total Modified Sound Level L_{dn} (dBA) [b]	Potential Change in the Current Sound Level (dBA)
NSA #1 (Houses)	450 ft S	44.1	47.1	3
NSA #2 (Houses)	1,000 ft N	44.1	44.8	0.7

[a] Measured levels during full load operation on June 23, 2025.
[b] Estimated levels with proposed modifications.
Source: Texas Gas, October 31, 2025, Application, RR 9, Table 9.3-2, FERC Accession No. 20251031-5314

Based on the estimated operational noise levels and our recommendations, we conclude

that the noise attributable to operation of the Project would not result in significant effects.

B.9 RELIABILITY AND SAFETY

The transportation of natural gas involves some incremental risk to the public due to the potential for accidental release of natural gas. The greatest hazard is a fire or explosion following a rupture or equipment failure. Methane, the primary component of natural gas, is colorless, odorless, and tasteless. It is not toxic but is classified as a simple asphyxiate, possessing a slight inhalation hazard. If breathed in high concentration, oxygen deficiency can result in serious injury or death. An unconfined mixture of methane and air is not explosive; however, it may ignite and burn if there is an ignition source. A flammable concentration within an enclosed space in the presence of an ignition source can explode. Methane is buoyant at atmospheric temperatures and disperses rapidly in air.

As described previously, the Project facilities would be designed, constructed, operated, and maintained in accordance with the DOT Minimum Federal Safety Standards in 49 CFR 192, including the provisions for written emergency plans and emergency shutdowns. The regulations are intended to ensure adequate protection for the public and to prevent natural gas facility accidents and failures. Texas Gas would provide the appropriate training to local emergency service personnel before the facilities are placed in service.

The DOT pipeline standards are published in 49 CFR 190–199. For example, 49 CFR 192 specifically addresses natural gas pipeline safety issues, prescribes the minimum standards for operating and maintaining pipeline facilities, and incorporates compressor station design, including emergency shutdowns and safety equipment. 49 CFR 192 also requires a pipeline operator to establish a written emergency plan that includes procedures to minimize the hazards in a natural gas pipeline emergency.

The operator must also establish a continuing education program to enable customers, the public, government officials, and those engaged in excavation activities to recognize a gas pipeline emergency and report it to appropriate public officials. With adherence to DOT pipeline standards, we conclude that constructing and operating the Project would represent a minimum increase in risk to the public.

B.10 CUMULATIVE EFFECTS

We identified other actions in the vicinity of the proposed Project and evaluated the potential for cumulative effects on the environment. Cumulative effects represent the incremental effects of a proposed project or action and the effects of other past, present, and reasonably foreseeable future projects and actions, regardless of what agency or party undertakes such actions. Cumulative effects often occur when Project footprints (ground disturbances) directly overlap. Since energy infrastructure projects rarely physically overlap with other projects, instances of cumulative effects can be limited. However, cumulative effects can result from individually minor, but collectively significant actions, taking place over time. Cumulative effects may also occur where a project's effects migrate outside of designated work areas, such as turbidity and sedimentation, air emissions, and noise.

To be included in this analysis, an action must: affect a resource potentially affected by the Project; cause this effect within all, or part of, the Project's geographic scope; and cause this effect within all, or part of, the time span for the potential effect from the Project. In this analysis, we do not delve into the historical details of individual past projects and consider the effects of past projects to be part of the affected environment. However, as appropriate, we consider the ongoing effects of past actions (i.e. emissions and noise) in this analysis. Additionally, the actions we consider are those that could affect similar resources during the same time frame as the Project.

Areas where cumulative effects have the potential to occur and are assessed are referred to as geographic scopes. Based on the Project's effects as identified and described in this EA and the known effects of other past, present, and reasonably foreseeable future projects and actions, we have determined that the resource-specific geographic scopes described below in table B-8 are appropriate to assess cumulative effects. In this analysis we include the following resources: soils, air quality, and noise. Considering the lack of effects and/or minor Project effects on geological resources, groundwater, waterbodies, wetlands, fisheries, vegetation, wildlife, protected species, visual, and cultural resources, cumulative effects were not evaluated for these resources. Projects and actions occurring outside the identified geographic scopes are not evaluated because their potential to contribute to a cumulative effect diminishes with increasing distance from the Project.

Table B-8 Resource-Specific Cumulative Effects Assessment Areas

Resource	Geographic Scope	Justification
Soils	Construction workspaces and immediately adjacent areas	Effects on soils would be highly localized and are not expected to extend much beyond the area of direct disturbance associated with the Project.
Air Quality – Construction	0.25-mile radius of construction workspaces	Air emissions during construction would be limited to vehicle and construction equipment emissions and dust and would be localized to the Project's active construction work areas and areas adjacent to these active work areas.
Air Quality – Operations	5-km radius from the Modified Crosby-Harrison Compressor Station	5-km is our baseline scope for minor source facilities. Effects on air quality beyond 5-km would be de minimis
Noise – Construction	NSAs withing 0.25-mile of construction activities	Areas in the immediate proximity of pipeline, aboveground facility construction, or drilling activities would have the potential to be affected by construction noise.
Noise – Operations	NSAs withing 1.0-mile of the Crosby-Harrison Station	Noise from the Project's aboveground facilities is not anticipated to have an effect beyond 1.0 mile of the compressor station

For each environmental resource, the potential direct and indirect effects associated with the Project are considered along with the effects of other projects within the geographic scope of analysis to determine if the additive effects could result in a cumulative effect. Any cumulative effect is further considered to determine if the effect would be significant.

As described previously, the Crosby-Harrison Station and New Haven Regulators site are located near a residential subdivision, and recreational and natural areas. Present or reasonably

foreseeable future projects and actions within the geographic scopes of the facilities include the aforementioned electric transformer upgrade within the Crosby-Harrison Compressor Station site and the development of two new residential subdivisions: the Trailhead and Oakland Hills communities.

The Trailhead residential subdivision, located about 1.5 miles north of the Project area and currently under construction, when complete would consist of up to 450 single family homes. The planned Oakland Hills residential subdivision, under development, would be located about 1.5 miles northwest of the Project area.

The replacement of an existing electric transformer with a larger unit at the Crosby-Harrison Compressor Station would occur within the established footprint of an existing, previously disturbed industrial facility and would not require expansion of the project workspace or result in new ground disturbance beyond minor, temporary construction activities. The upgrade would be coordinated by the local utility provider and is limited in scope and duration, with no anticipated long-term changes in emissions or environmental conditions. Accordingly, when considered in combination with other past, present, and reasonably foreseeable future actions, this non-jurisdictional activity would not result in a significant cumulative effect.

The trailhead and Oakland Hills residential subdivisions would occur outside the geographic scope of effects for every resource except air quality (operations). We note that the cumulative modeled impacts of the Crosby-Harrison Compressor Station would be below the NAAQS. While the subdivisions' effects on air quality are unknown, additional vehicle emissions would occur from residential transportation; emissions from small engines such as leaf blowers, and lawnmowers; as well as emissions from home appliances and heating. However, these emissions would vary based on energy source and time of year. Therefore, operational emissions from the Crosby-Harrison Compressor Station when combined with potential emissions from two new residential subdivisions could result in a cumulative effect, but we expect any cumulative effect to be minor and not significant.

Climate Change

Climate change is the variation in the Earth's climate (including temperature, precipitation, humidity, wind, and other meteorological variables) over time. Climate change is driven by accumulation of GHGs in the atmosphere due to the increased consumption of fossil fuels (e.g., coal, petroleum, natural gas) since the early beginnings of the industrial age and accelerating in the mid- to late-20th century.[35] The GHGs produced by fossil-fuel combustion are CO_2, CH_4, and N_2O.

In 2017 and 2018, the U.S. Global Change Research Program (USGCRP)[36] issued its

[35] Intergovernmental Panel on Climate Change (IPCC), United Nations, *Summary for Policymakers of Climate Change 2021: The Physical Science Basis* (Valerie Masson-Delmotte et al., eds.) (2021), https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf (IPCC Report) at SPM-5. Other forces contribute to climate change, such as agriculture, forest clearing, and other anthropogenically driven sources.

[36] The USGCRP comprised representatives from 13 federal departments and agencies and issued reports every 4 years that described the state of the science relating to climate change and the effects of climate

Climate Science Special Report: Fourth National Climate Assessment, Volumes I and II.[37] This report and the report by the Intergovernmental Panel on Climate Change, *Climate Change 2021: The Physical Science Basis*, state that climate change has resulted in a wide range of effects across every region of the country and the globe. Those effects extend beyond atmospheric climate change alone and include changes to water resources, agriculture, ecosystems, human health, and ocean systems.[38] According to the USGCRP's Fourth Assessment Report, the United States and the world are warming; global sea level is rising and oceans are acidifying; and certain weather events are becoming more frequent and more severe.[39] These effects have accelerated throughout the end of the 20th and into the 21st century.[40]

GHG emissions do not result in proportional local and immediate effects; it is the combined concentration in the atmosphere that affects the global climate. These are fundamentally global effects that feed back to local and regional climate change effects. Thus, the geographic scope for cumulative analysis of GHG emissions is global rather than local or regional. For example, a project 1 mile away emitting 1 ton of GHGs would contribute to climate change in a similar manner as a project 2,000 miles distant also emitting 1 ton of GHGs.

Climate change is a global phenomenon; however, for this analysis, we will focus on the existing and potential climate change effects in the general Project area. The USGCRP's Fourth Assessment Report notes the following observations of environmental effects attributed to climate change climate change in the Midwest region (which include Ohio):[41]

- Increases in warm-season absolute humidity and precipitation have eroded soils, created favorable conditions for pests and pathogens, and degraded the quality of stored grain.
- Threats from a changing climate are interacting with existing stressors, such as invasive species and pests, to increase tree mortality and reduce forest productivity.
- Stormwater management systems, transportation networks, and other critical infrastructure are already experiencing effects from changing precipitation patterns and elevated flood risks.
- At-risk communities in the Midwest are becoming more vulnerable to climate change effects such as flooding, drought, and increases in urban heat islands, and tribal nations are especially vulnerable because of their reliance

change on different regions of the United States and on various societal and environmental sectors, such as water resources, agriculture, energy use, and human health.

[37] USGCRP, Climate Science Special Report, Fourth National Climate Assessment | Volume I (Donald J. Wuebbles et al. eds) (2017), (USGCRP Report Volume I), available at https://repository.library.noaa.gov/view/noaa/19486. U.S. Global Change Research Program, Fourth National Climate Assessment, Volume II Impacts, Risks, and Adaptation in the United States (David Reidmiller et al. eds.) (2018) (USGCRP Report Volume II), available at https://repository.library.noaa.gov/view/noaa/19487.

[38] IPCC Report at SPM-5 to SPM-10.

[39] USGCRP Report Volume II at 73-75.

[40] See, e.g., USGCRP Report Volume II at 99 (describing accelerating flooding rates in Atlantic and Gulf Coast cities).

[41] USGCRP Report Volume I and II.

on threatened natural resources for their cultural, subsistence, and economic needs.

The USGCRP's Fourth Assessment Report notes the following projections of climate change effects in the Midwest Region with a high or very high level of confidence:[42]

- Projected changes in precipitation, coupled with rising extreme temperatures before mid-century, will reduce Midwest agricultural productivity to levels of the 1980s without major technological advances.
- Effects will result in the loss of economically and culturally important tree species, such as paper birch and black ash, and are expected to lead to the conversion of some forests to other forest types or even to non-forested ecosystems by the end of the century.
- Climate change is expected to worsen existing conditions and introduce new health threats by increasing the frequency and intensity of poor air quality days, extreme high temperature events, and heavy rainfalls; extending pollen seasons; and modifying the distribution of disease-carrying pests and insects.
- The annual cost of adapting urban stormwater systems to more frequent and severe storms is projected to exceed $500 million for the Midwest by the end of the century.

It should be noted that while the effects described above taken individually may be manageable for certain communities, the effects of compound events (such as simultaneous heat and drought, wildfires associated with hot and dry conditions, or flooding associated with high precipitation on top of saturated soils) can be greater than the sum of the parts.[43]

The GHG emissions associated with construction and operation of the Project were identified and quantified in section B.7 of this EA. Emissions of GHGs are typically expressed in terms of CO_{2e}.[44] Construction CO_{2e} emissions from the Project are estimated to be 892.7 metric tons (984 tons).[45] These GHG emissions would occur during the temporary construction period (a total of 11 months). We estimate that operational CO_{2e} emissions as a result of the Project would potentially be 56,510 metric tons (62,292 tons) per year.

Construction and operation of the Project would increase the atmospheric concentration of GHGs in combination with past, current, and future emissions from all other sources globally, and would contribute incrementally to future climate change effects. To assess effects on climate change associated with the Project, Commission staff considered whether it could

[42] USGCRP Report Volume II.
[43] USGCRP Report Volume II.
[44] GHGs are converted to CO_{2e} by means of the global warming potential; the measure of a particular GHG's ability to absorb solar radiation; and its residence time within the atmosphere, consistent with the USEPA's established method for reporting GHG emissions for air permitting requirements that allows a consistent comparison with federal regulatory requirements.
[45] Figures presented here are converted from U.S. tons to metric tons. A metric ton is about equal to 1.1 ton.

identify discrete physical effects resulting from the Project's GHG emissions or compare the Project's GHG emissions to established targets designed to combat climate change.

To date, Commission staff have not identified a methodology to attribute discrete, quantifiable, physical effects on the environment resulting from the Project's incremental contribution to GHGs. Without the ability to determine discrete resource effects, Commission staff are unable to assess the Project's contribution to climate change through any objective analysis of physical effect attributable to the Project. Additionally, Commission staff have not been able to find an established threshold for determining the Project's significance when compared to established GHG reduction targets at the state or federal level. Ultimately, this EA is not characterizing the Project's GHG emissions as significant or insignificant.[46] However, as we have done in prior NEPA analyses, we disclose the Project's GHG emissions in comparison to national and state GHG emission inventories.

In order to provide context of the Project GHG emissions on a national level, we compare the Project GHG emissions to the total current GHG emissions inventory for the United States as a whole. At a national level, 5,489.0 million metric tons of CO_{2e} were emitted in 2022 (inclusive of CO_{2e} sources and sinks; USEPA, 2024b). Construction emissions from the Project could potentially increase CO_{2e} emissions based on the national inventory levels by 0.00002 percent. In subsequent years, Project operations could result in a potential increase in CO_{2e} emissions by 0.001 percent based on the national 2022 inventory levels.

To provide context on a state level, we compare the Project's estimated GHG emissions to the state emission inventories. The Project's construction and operational emissions would occur in Hamilton County, Ohio. At a state level, energy related CO_2 emissions in 2023 were 184.2 million metric tons in Ohio (U.S. Energy Information Administration, 2026). Project construction in Ohio could potentially increase CO_2 emissions based on Ohio's statewide 2023 levels by 0.0005 percent. Project operational emissions in Ohio could potentially increase CO_2 emissions based on Ohio's statewide 2023 levels by 0.03 percent.

When states have GHG emissions reduction targets, we compare the project's operational GHG emissions to those state goals to provide additional context. Ohio has not set statewide goals for GHG emissions reduction targets.[47]

[46] *See e.g.*, *Driftwood Pipeline LLC*, 183 FERC ¶ 61,049, at P 63 (2023) ("…there currently are no accepted tools or methods for the Commission to use to determine significance, therefore the Commission is not herein characterizing these emissions as significant or insignificant.").
[47] https://www.c2es.org/content/state-climate-policy/

SECTION C – ALTERNATIVES

In accordance with NEPA and Commission policy, we sought to identify and evaluate alternatives to the Project to determine whether they would be reasonable and preferable to the proposed action while meeting the Project objective. Our evaluation of alternatives is based on Project-specific information provided by Texas Gas, publicly available information, and our expertise and experience regarding the siting, construction, and operation of natural gas projects and such projects' potential effects on the environment. It is important to recognize that not all conceivable alternatives can meet the Project's purpose or are technically and economically feasible and practical; therefore, an alternative that does not meet the Project's purpose and/or is not feasible and practical cannot be considered a viable alternative. Based on the scope of the Project, its collocation with existing Texas Gas' facilities, and its effects on the natural and human environment as described in the preceding analyses, we did not identify or evaluate any facility, equipment, or location alternatives to the Project. As described below, we evaluated the no-action alternative.

No-Action Alternative

NEPA requires the Commission to consider and evaluate the No-Action Alternative. In instances involving federal decisions on proposals for projects, the No-Action Alternative would mean the proposed activity would not take place and the resulting environmental effects would not occur. If no-action is chosen, the purpose of the Project would not be met and the need for the Project would not be satisfied. Additionally, if the No-Action Alternative is selected, the benefits of the Project (increased transmission capacity) would not occur. We have not identified any reasonably foreseeable negative environmental effects of implementing the no-action alternative, as it is speculative to predict whether alternative projects would meet the stated purpose of the Project.

Staff has not identified a significant effect on the environment associated with the proposed action, and we do not recommend the no-action alternative. However, we have prepared this EA to inform the Commission and stakeholders about the expected effects that would occur if the Project were constructed and operated. Ultimately, the Commission will determine the Project need and could choose the No-Action Alternative.

Alternatives Conclusions

Based on the preceding analysis, we conclude that the proposed Project, with our recommended mitigation measures, is the preferred alternative to meet the Project objectives.

SECTION D – STAFF'S CONCLUSIONS AND RECOMMENDATIONS

Based on the analysis in this EA, we have determined that approval of the Project would not constitute a major federal action significantly affecting the quality of the human environment. We recommend that the Commission Order contain a finding of no significant effect and that the following mitigation measures be included as conditions to any Certificate the Commission may issue:

1. Texas Gas shall follow the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests) and as identified in the environmental assessment (EA), unless modified by the Order. Texas Gas must:

    a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary);
    b. justify each modification relative to site-specific conditions;
    c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
    d. receive approval in writing from the Director of the Office of Energy Projects (OEP), or the Director's designee, **before using that modification**.

2. The Director of OEP, or the Director's designee, has delegated authority to address any requests for approvals or authorizations necessary to carry out the conditions of the Order, and take whatever steps are necessary to ensure the protection of environmental resources during construction and operation of the project. This authority shall allow:

    a. the modification of conditions of the Order;
    b. stop-work authority; and
    c. the imposition of any additional measures deemed necessary to ensure continued compliance with the intent of the conditions of the Order as well as the avoidance or mitigation of unforeseen adverse environmental effects resulting from project construction and operation.

3. **Prior to any construction**, Texas Gas shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, environmental inspectors (EIs), and contractor personnel will be informed of the EI's authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with construction and restoration activities.

4. The authorized facility locations shall be as shown in the EA, as supplemented by filed alignment sheets. **As soon as they are available, and before the start of construction**, Texas Gas shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.

Texas Gas' exercise of eminent domain authority granted under Natural Gas Act (NGA) section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. Texas Gas' right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of its natural gas facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

5. Texas Gas shall file with the Secretary detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP, or the Director's designee, **before construction in or near that area**.

   This requirement does not apply to extra workspace allowed by the Commission's *Upland Erosion Control, Revegetation, and Maintenance Plan* and/or minor field realignments per landowner needs and requirements which do not affect other landowners or sensitive environmental areas such as wetlands.

   Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

   d. implementation of cultural resources mitigation measures;
   e. implementation of endangered, threatened, or special concern species mitigation measures;
   f. recommendations by state regulatory authorities; and
   g. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.

6. **Within 60 days of the acceptance of the authorization and before construction begins**, Texas Gas shall file an Implementation Plan with the Secretary for review and written approval by the Director of OEP, or the Director's designee. Texas Gas must file revisions to the plan as schedules change. The plan shall identify:

   a. how Texas Gas will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EA, and required by the Order;
   b. how Texas Gas will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications),

and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;

c. the number of EIs assigned, and how the company will ensure that sufficient personnel are available to implement the environmental mitigation;
d. company personnel, including EIs and contractors, who will receive copies of the appropriate material;
e. the location and dates of the environmental compliance training and instructions Texas Gas will give to all personnel involved with construction and restoration (initial and refresher training as the project progresses and personnel change);
f. the company personnel (if known) and specific portion of Texas Gas's organization having responsibility for compliance;
g. the procedures (including use of contract penalties) Texas Gas will follow if noncompliance occurs; and
h. for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram), and dates for:

    (1) the completion of all required surveys and reports;
    (2) the environmental compliance training of onsite personnel;
    (3) the start of construction; and
    (4) the start and completion of restoration.

7. Texas shall employ at least one EI for the Project. The EI shall be:

    a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or other authorizing documents;
    b. responsible for evaluating the construction contractor's implementation of the environmental mitigation measures required in the contract (see condition 6 above) and any other authorizing document;
    c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document;
    d. responsible for documenting compliance with the environmental conditions of the Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and
    e. responsible for maintaining status reports.

8. Beginning with the filing of its Implementation Plan, Texas Gas shall file updated status reports with the Secretary on a **monthly** basis until all construction and restoration activities are complete. On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include:

    a. an update on Texas Gas' efforts to obtain the necessary federal authorizations;
    b. the construction status of the project, work planned for the following reporting period, and any schedule changes for stream crossings or work in other environmentally-sensitive areas;

c. a listing of all problems encountered and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);
d. a description of the corrective actions implemented in response to all instances of noncompliance;
e. the effectiveness of all corrective actions implemented;
f. a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns; and
g. copies of any correspondence received by Texas Gas from other federal, state, or local permitting agencies concerning instances of noncompliance, and Texas Gas' response.

9. Texas Gas must receive written authorization from the Director of OEP, or the Director's designee, **before commencing construction of any project facilities.** To obtain such authorization, Texas Gas must file with the Secretary documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).

10. Texas Gas must receive written authorization from the Director of OEP, or the Director's designee, **before placing the authorized facilities into service**. Such authorization will only be granted following a determination that rehabilitation and restoration of the right-of-way and other areas affected by the project are proceeding satisfactorily.

11. **Within 30 days of placing the authorized facilities in service**, Texas Gas shall file an affirmative statement with the Secretary, certified by a senior company official:

    a. that the facilities have been constructed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or
    b. identifying which of the conditions in the Order Texas Gas has complied with or will comply with. This statement shall also identify any areas affected by the project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.

12. Texas Gas shall consult with Great Parks of Hamilton County to develop a visual screening plan for the New Haven Regulators Facility. **Prior to construction,** Texas Gas shall file the visual screening plan and any Great Parks of Hamilton County comments on the plan with the Secretary, for review and written approval by the Director of OEP, or the Director's designee.

13. Texas Gas shall file a noise survey with the Secretary **no later than 60 days** after placing the authorized unit at the Crosby-Harrison Compressor Station in service. If a full load condition noise survey of the entire station is not possible, Texas Gas shall file an interim survey at the maximum possible horsepower load and file the full load survey **within 6 months**. If the noise attributable to the operation of all of the equipment at the modified

Crosby-Harrison Compressor Station under interim or full horsepower load conditions exceeds an Ldn of 55 dBA at any nearby NSAs, Texas Gas shall file a report on what changes are needed and shall install additional noise controls to meet that level **within 1 year** of the in-service date. Texas Gas shall confirm compliance with this requirement by filing a second noise survey with the Secretary **no later than 60 days** after it installs the additional noise controls.

14. Texas Gas shall file a noise survey with the Secretary **no later than 60 days** after placing the authorized regulators at the New Haven Regulators Facility in service. If a full flow rate noise survey at the facility's maximum design capacity is not possible, Texas Gas shall file an interim survey at the maximum possible flow rate and file the full flow rate survey **within 6 months**. If the noise attributable to the operation of all of the equipment at the modified New Haven Regulators Facility under interim or full flow rate conditions exceeds an L_{dn} of 55 dBA at any nearby NSAs, Texas Gas shall file a report on what changes are needed and shall install the additional noise controls to meet that level **within 1 year** of the in-service date. Texas Gas shall confirm compliance with this requirement by filing a second noise survey with the Secretary **no later than 60 days** after it installs the additional noise controls.

SECTION E LIST OF PREPARERS

Altamimi, Najeyah – **Project Manager, Biological Resources**
M.S., Environmental Biology, 2022, Hood College
B.S., Environmental Science, 2021, Washington College

Allison, King – Cultural Resources
M.S., Applied Anthropology, 2013, University of North Texas
B.A., Anthropology, 1998, University of Nevada Las Vegas

Jeudy, Harry – Air, Noise and Safety
B.S., Mechanical Engineering, 2000, The Pennsylvania State University

Kove, Michael – Geology, Soils, and Groundwater
B.S., Geology, New Mexico State University, 2013

Polit, Juan –Land Use
M.S., Forest Ecology, 1992, University of Illinois
B.S., Forest Science, 1989, University of Illinois

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