



September 3, 2019

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Joshua Wayland
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

RE: Seven County Infrastructure Coalition Environmental Impact Statement Draft Scope of Study, Docket No. FD 36284

Dear Mr. Wayland:

Western Energy Alliance strongly supports infrastructure solutions to provide safer, more environmentally sound transportation of crude oil, hydrocarbon liquids, and other goods to and from the Uinta Basin. We appreciate the opportunity to comment on the Draft Scope of Study for the Environmental Impact Statement (EIS) for Seven County Infrastructure Coalition's Uinta Basin Railway.

Western Energy Alliance represents 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas across the West. The Alliance represents independents, the majority of which are small businesses with an average of fourteen employees.

Many of our member companies operate in the Uinta Basin and are interested in alternative ways to ship the black and yellow wax oils that are found in the basin. These oils must be stored and transported in heated and insulated tanks in order to maintain their liquid states. Currently, specialized trucks must transport these waxy oils from the basin to refineries in Salt Lake City over 150 miles away. Rail transportation would cut down on the 300 truck trips per day and provide a safer method of transport with less environmental impact.

The Uinta Basin is disadvantaged by its relative isolation and the properties of the oil produced in the area. Oil refineries within trucking distance are limited by the amount of the waxy oils they can blend with more conventional oils. This results in a 10-15% price disparity between Uinta Basin production and other crude oils.¹ Cheaper, more reliable rail

¹ [East of Rockies Pricing](#), Chevron Crude Oil Marketing, July 2019

transportation would open other refining options around the country and help to ease the costs on producers, thereby encouraging more production in the basin.

The Draft Scope of Study contains 14 impact categories that are reasonable and appropriate for the type of project the Coalition proposes. There are however a few impact categories for which we would like to see an expanded analysis. In the Safety category, we suggest an analysis of the potential for a decrease in traffic accidents due to fewer tanker trucks and other heavy-duty trucks being replaced. In the Air Quality category, we would suggest an analysis of the air emission reductions resulting from the displacement of heavy-duty truck traffic not just within the basin, but also along the Wasatch Front, both of which are designated as nonattainment for the ozone National Ambient Air Quality Standard. The Socioeconomics category should include analysis of the economic benefits of more efficient industrial links to the national rail lines, and how those benefits accrue to the Ute Indian Tribe and the entire basin.

We appreciate the opportunity to provide comment on the important Uinta Basin Rail Line project. We strongly support an expedited EIS and subsequent project approval, which will bring substantial environmental, economic, and safety benefits.

Sincerely,



Kathleen M. Sgamma
President