



April 30, 2026

Bureau of Land Management
Miles City Field Office
Attn: Bridger Pipeline Expansion Project Comments
111 Garryowen Rd
Miles City, Montana 59301
DOI-BLM-MT-C020-2026-0054-EIS

To Whom it May Concern,

Following are the Wyoming Department of Agriculture (WDA) scoping comments regarding the Bridger Pipeline Expansion (Project) within the Newcastle Bureau of Land Management (BLM) and the Thunder Basin National Grasslands (TBNG).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life. As the proposed project could affect our industry, citizens, and natural resources it is important that you continue to inform us of proposed actions and decisions and continue to provide the opportunity to communicate pertinent issues and concerns.

The Scoping Notice indicates the project will encompass 646.86 miles of pipeline from the Canadian border through Montana ending in Guernsey, Wyoming. The Wyoming portion will span 211.66 total miles; 6.2 miles on BLM, 5.2 miles on TBNG, 22.85 miles on state lands, and 177.47 miles on private lands. The WDA supports private property rights and the decisions of landowners. As the Project proponent engages with these parties, the WDA offers the following comments to address both private and federal land concerns, with the goal of reducing adverse impacts to grazing allotments and the broader livestock industry.

The Project is designed to initially deliver approximately 550,000 barrels of crude oil per day; however, the integration of additional pump stations will allow for a maximum throughput of 1.13 million barrels per day. The proposed route involves new pipeline construction, with 52% of the alignment either co-located within existing rights-of-way or running parallel to current infrastructure. In Wyoming, approximately 90.7 miles of the pipeline will consist of new construction that is neither co-located nor parallel. Project activities will result in temporary and long-term disruptions, including impacts on livestock grazing, wildlife habitats, forage availability, the potential introduction of noxious weeds and pests, and reclamation challenges.

The BLM must analyze livestock grazing within the Draft Environmental Impact Statement (DEIS) and provide a comprehensive inventory of grazing allotments, including a detailed breakdown of acreage and Animal Unit Months (AUM) losses per allotment for both BLM and TBNG. WDA urges BLM to require a weed management plan and reclamation plan, which should include short and long term objectives and requirements. WDA encourages the Project proponent to work with the livestock grazing permittees and landowners to collaborate on the construction schedule to ensure limited disruption to livestock production and management.

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WDA insists on BLM & TBNG inventorying and mapping all range improvements across the project area prior to any further analysis. The Project is likely to conflict with range improvements. Examples of range improvements might include fences, stock tanks, pipelines, or other water impoundments. These improvements are strategically located to aid in livestock management across the allotments. The project proponent should also develop a list of range improvement projects that would need to be completed as a result of the project.

As part of the analysis, the BLM and TBNG must recognize the potential for indirect impacts to livestock grazing permittees, including altered water availability and quality, wildlife displacement, shifts in soil health, nutrient cycling, and forage loss or contamination. The WDA urges the agencies to thoroughly document Land Health Standards (LHS) as a baseline of current conditions within the NEPA analysis. Without a rigorous 'Existing Conditions' benchmark, the agencies will lack the data necessary to distinguish pre-existing trends from project induced impacts. Ultimately, the DEIS should explicitly acknowledge that any post-implementation shifts in land health are a result of the authorized action and its subsequent alteration of the landscape, rather than a reflection of permittee management.

In conclusion, we appreciate the opportunity to work with the BLM as a Cooperating Agency and look forward to working with your staff on the project. If you have any questions, please contact Holly Siebert, Senior Policy Analyst at 307-777-7024.

Sincerely,



Doug Miyamoto
Director

DM/hs

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
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