



**Department of Energy**  
Western Area Power Administration  
P.O. Box 281213  
Lakewood, CO 80228-8213

May 28, 2020

Subject: Scoping Letter for an Environmental Assessment for the Proposed Pronghorn Flats Wind 115-kilovolt Project

Dear Landowner and Interested Parties:

The Western Area Power Administration (WAPA) is announcing a public scoping period, from May 29th to June 26th, 2020 for the Pronghorn Flats Wind 115 kilovolt (kV) Project interconnection request. More information about the Pronghorn Flats Wind 115-kV Project (115-kV Project) is found in the project information section below.

WAPA is a federal power-marketing administration within the U.S. Department of Energy that operates and maintains electrical transmission lines and associated facilities in accordance with the Federal Power Act (FPA) Sections 210 to 213, and it's Open Access Transmission Service Tariff (OATT). Under the OATT, WAPA offers capacity on its transmission system to deliver electricity when capacity is available. WAPA's purpose and need for this project is to consider and respond to a request from Orion Wind Resources LLC (Orion) to interconnect their 115-kV Project with WAPA's transmission system, in accordance with the Federal Power Act and OATT.

Granting an interconnection to Orion also requires that the project be evaluated by WAPA under the National Environmental Policy Act (NEPA). WAPA will prepare an Environmental Assessment (EA) to evaluate the potential impacts associated with Orion's proposed interconnection request and provide an opportunity for public review and scoping of the EA. The EA will be made available to the public in late 2020. The EA will evaluate potential impacts to biological resources, cultural resources, soils, air, water, transportation, viewsheds, socioeconomics, and the public in general, as well as the cumulative effects of past, present and future development of the surrounding areas.

This scoping period provides an opportunity for the general public, government agencies, and tribal governments to review the 115-kV Project and the interconnection request and provide comments on resources or issues that may be affected. Your review and comments will help define issues and alternatives for consideration in the EA. Information on how to submit your comments is found at the end of this letter.

### *115-kV Project Information*

Orion Wind Resources LLC (Orion) proposes to construct and operate two projects that together are considered the Pronghorn Flats Wind Farm Complex (Complex). The Complex includes this 115-kV Project and a future 230-kV project. The 115-kV Project and interconnection request is the focus of this public scoping effort.

The 115-kV Project consists of a proposed wind farm and a new 115-kV transmission line that will transmit electricity from the wind farm to a WAPA switch-yard (the point of interconnection), into WAPA's Round Top-to-Stegall segment of the Stegall-to-Archer 115-kV transmission line (Figure 1), and into the electrical grid.

### *Wind Turbines*

The proposed Pronghorn Flats Wind 115-kV Project would consist of between 21 to 58 turbines producing between 2 to 5.5 megawatts (MW) each and have a total interconnection capacity of up to approximately 115 MW. Figure 1 shows the preliminary indicative locations for 43 turbines.

Turbine heights will be determined upon selection of final turbine make and model for the wind farm. Orion expects that the wind turbine “hub height” (height from the base of the tower to the center of the rotor hub on top of the tower) may be up to approximately 360 feet, and the total wind turbine height (i.e., height of vertical blade-tip pointing straight up) may be up to approximately 600 feet. These heights are based on the upper range of turbine dimensions being considered for the 115-kV Project and may overestimate final dimensions. Final turbine layout and specification are subject to some modification as the wind farm evolves through scoping, surveys, permitting and approvals, and micro-siting.

Each turbine would sit on a permanent concrete foundation, also known as a turbine pad, to provide structural support to the assembled turbine. Each turbine pad would measure approximately 0.05 acre. Except for roughly 2.5 feet that would remain aboveground, the tower foundation would be underground. The towers would be painted a non-glare white per Federal Aviation Administration (FAA) requirements. During construction, roughly 3.6 acres per turbine would be needed to stage the wind turbine parts and to maneuver equipment during turbine assembly.

### *Access Roads*

The preliminary estimate of access roads for the 115-kV Project is about 46 miles, including about 19.5 miles of existing roads and about 26.5 miles of new access roads. On-site access roads would be developed across leased private land to allow access to individual turbines. During construction, the disturbance area for new access roads could be as wide as 50 feet wide. After construction, the roads would be maintained at 16 feet wide. Existing public roads, private roads, and field paths would be used whenever possible. The existing roads may require improvements before, during, or following construction. Improvements could include adding gravel, widening, or repairing potholes.

### *O&M Facility*

The operations and maintenance (O&M) facility would be located on a 5-acre square parcel adjacent to the current project substation, communications facilities, and access to 115-kV Project facilities. The O&M facility would be a single-story building, and would house operating personnel, offices, operations and communication equipment, parts storage and maintenance activities, and a vehicle parking area. An area for outdoor storage of larger equipment and materials would also be included within a fenced area for safety and security. Running water into the O&M facility would be provided by either the existing rural water system or a new private water well.

### *Meteorological Towers*

The 115-kV Project would include up to three permanent meteorological towers to monitor weather and wind conditions within the 115-kV Project vicinity. The design, and other specifications of the proposed meteorological towers, have not been determined at this time but would be established as the 115-kV Project evolves. The towers would comply with FAA

guidelines and would be connected to the 115-kV Project collection system for communications and power needs.

#### *Temporary Laydown/Stockpile Areas/Batch Plant Areas and Crane Path*

Temporary facilities for the 115-kV Project include a concrete batch plant, crane paths for the construction of the wind farm, and a laydown yard to store construction materials. Construction tools, materials, equipment, and vehicles would be stored at the laydown yard until needed for construction activities. The laydown yard would be revegetated once construction is complete, except for a portion retained for the O&M facility (if the laydown yard and O&M facility are sited on the same location).

#### *Project Electrical System*

Each wind turbine would be interconnected by a communication and electrical power collection system. These facilities would include underground 34.5-kV electrical power collector lines that would collect wind-generated power from each wind turbine and deliver it to the substation. Underground collector and communication lines would be buried approximately 3-4 feet below the surface. This allows the land to remain in agricultural use after construction and during operation of the 115-kV Project. The estimated cumulative length of collector lines is approximately 47 miles.

The wind farm substation, located along Banner County Road 9 and within the wind farm, would include a transformer to step up the voltage of the collector lines from 34.5-kV to 115-kV, above-ground infrastructure to connect the substation components, breakers, relays, switchgear, communications and controls, and other related facilities required for delivery of electric power to WAPA's main electrical grid. Substation design has not been finalized, but Orion expects the substation to be enclosed by a chain link fence and require approximately six acres. All Project infrastructure would be designed, built, and operated in compliance with federal, state, and local regulations, National Electrical Safety Code standards, and other applicable industry standards.

A new approximate 25 mile 115-kV transmission line would be constructed to transmit electricity from the proposed wind farm substation to the point of interconnection at WAPA's switchyard (Figure 1). The 115-kV transmission line traverses through private and state land in southwestern Banner and northwestern Kimball Counties, Nebraska and southeastern Goshen County, Wyoming (Figure 1). The proposed WAPA switchyard is expected to be located in the vicinity of La Grange, Wyoming. The 115-kV transmission line right-of-way width, average spacing of poles, and design of poles (height and style) will be developed and provided to the public as part of the EA process.

Temporary construction disturbance along the transmission line corridor are anticipated to be approximately 100 feet wide. Permanent disturbance would be limited to the area required for the transmission line structures. Additional temporary construction workspace may be required to allow for access to the easement area, cable-pulling, or stringing the transmission line on the conductors. All temporary construction workspace would be restored once construction is complete. Vegetation in the easement area would be maintained to protect the lines, allow for ground-based inspections, and access to transmission structures when maintenance is required.

#### *Pending 230 kV Project*

In addition to the Pronghorn Flats 115-kV Project, Orion has submitted a second and separate 230-kV interconnection request to interconnect a larger wind farm in the Pronghorn Flats

Complex. The 230-kV transmission line will be evaluated by WAPA in a future Environmental Impact Statement as a separate project. The separate 230-kV project design is would use different transmission lines on WAPA's transmission network and would allow for either project to move forward independently. There is also a second wind facility with a third transmission line proposed in the immediate vicinity of Orion's Pronghorn Flats Complex. This second wind facility and third transmission line are being proposed by a different developer and are not associated, in any way, with the Orion Pronghorn Flats Complex.

WAPA would like to know of any issues, concerns, and suggestion you may have regarding the proposed 115-kV Project. Your comments will help define issues and alternatives for consideration in this NEPA review process. Comments can be submitted in writing (via U.S. mail or email), by phone, or by fax in the following ways:

By mail:

Western Area Power Administration  
Attn: Mr. Steve Blazek  
P.O. Box 281213  
Lakewood, Colorado 80228-8213

By phone: (303) 551-5970  
By fax: (720) 962-7269  
By email: [sblazek@wapa.gov](mailto:sblazek@wapa.gov)

For your input to be considered during preparation of the draft EA, WAPA requests comments be received or postmarked by June 26, 2020. If you have any questions, or need more information about the Project, please contact WAPA using the methods listed above or visit the WAPA website at: <https://www.wapa.gov/transmission/interconnection/Pages/Banner-County-Wind.aspx>

Thank you for your time and interest in the 115-kV Project.

Sincerely,

Steve Blazek  
NEPA Document Manager

Enclosure:  
Overview Map

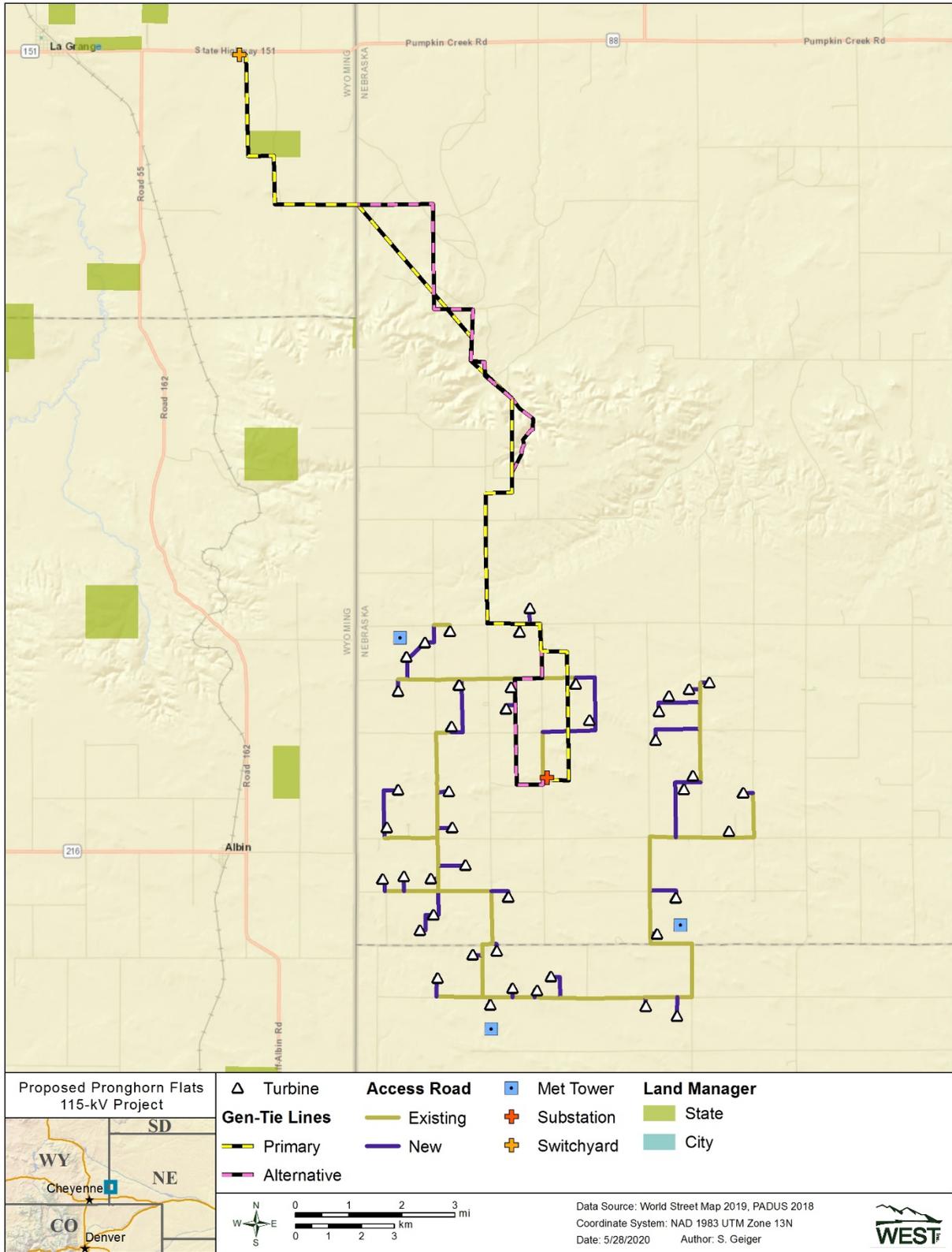


Figure 1. Indicative layout for the Pronghorn Flat 115-kV Project in Banner & Kimball Counties, Nebraska and Goshen County, WY.