



January 15, 2011

Alaska State Legislature
Alaska State Capitol
allegislators@state.ak.us
Juneau, AK 99801

Subject: December Progress Report on the In-State Natural Gas Pipeline Project

Dear Legislators:

In accordance with HB369, the Alaska Gasline Development Corporation (AGDC) submits the following monthly Project progress report for your review.

In the Month of December AGDC entered into reimbursable service agreements (RSA's) with several state agencies to progress the work associated with the Project. AGDC signed an RSA with the Alaska Railroad Corporation to support work with right-of-way requests, railroad crossing identification, material site location and engineering work required for development of the Project. AGDC also entered into an RSA agreement with DEC for the assistance of an environmental engineer to assist with air quality issues. Further, AGDC entered into an RSA with DNR to support funding a portion of the Ryder Scott Company work on a Cook Inlet gas report. The information from that report will be shared with the legislature in the January 2011 report. Another RSA negotiated with the State Pipeline Coordinator's Office was entered into in December for coordination work on the right-of-way permit and to support specific services and coordination with other State agencies including; Division of Mining Land & Water, Office of Project Management and Permitting, Division of Coastal and Ocean Management, Division of Geological and Geophysical Surveys and State Historic Preservation Office. AGDC is also working with BLM to issue funding for the next phase of work required under the Cost Recovery Agreement (CRA) between AGDC and BLM for the 2011 calendar year work. The amount of all RSA's (including the BLM CRA) active at the end of December total \$1,534,686.79.

A meeting was held with Energia Cura December 14 to learn more about the work their group is doing in Fairbanks.

AGDC is working to revise the Right-of-Way Application and the Project Plan of Development to address the questions and recommendations presented through the ongoing work with the coordinating agencies.

Work continues of optimization of the 500MMscfd base case scenario and the optimization work continues on the facilities.

AGDC is working with contractors and agencies on the Tanana River borehole drilling program. Permits are in progress and drilling is expected to commence within 60 days. Prior to commencing the work, AGDC will work with the community to educate stakeholders on the Project and the upcoming work.

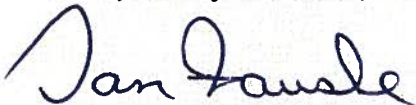
Environmental work commenced on the "special design areas" of Atigun Pass, Tanana, Denali Park Bypass and Yukon River areas.

AGDC is working to build a Web-based GIS database for state and federal access and agency use. The AGDC Project staff, contractors and agencies are coordinating the planning and strategy of the 2011 field program and the 2011 Project Outreach program.

Continued efforts are underway with contractors and agencies to coordinate the distribution of information to all related and pertinent websites to insure accurate and consistent information is presented to the public.

Thank you for your continued support and interest in the progress of the Alaska In-State Natural Gas Pipeline Project. Please call either 907.330.8452 or 907.277.4432 with any questions on information in this report or to request more information on the Project.

Respectfully submitted,



Dan Fauske
Chair, Joint In-State Gasline Development Team

Enclosure: Monthly contractor activity reports from ASRC Energy Services, Michael Baker, Inc. and Entrix

cc: Honorable Governor Parnell
AHFC Board Members
AGDC Team Members

Alaska Stand Alone Gas Pipeline Project Details

December 2010

ASRC Energy Services – Project Activity Detail – December 2010

Team Milestones:

- Participated in project-related meetings.
- Participated in team discussions regarding EIS.
- Participated in USACE EIS Coordination Team Meetings.
- Continue to coordinate Tier 2 major permits and air permitting issues, assertions, assumptions, and path forward.
- Continue to coordinate with Baker on GIS data sharing.
- Continue to coordinate the engineering Request for Additional Information to Michael Baker, Jr. (Baker) to support Tier 1 and Tier 2 permitting efforts and response to agency comments on the August 2010 Plan of Development (POD).
- Continue to develop draft Biological Assessment (BA).
- Received Bureau of Land Management (BLM) comments on the federal ROW application and preparing response along with responses to State Pipeline Coordinator Office (SPCO), Alaska Department of Fish and Game (ADF&G), Environmental Protection Agency (EPA), and National Park Service (NPS).
- Participated in AGDC and agency team meetings to discuss permit data gaps, subsistence and other permitting issues.
- Finalizing major field work technical report deliverables for lakes and streams.
- Began development of 2011 work plan including identification of critical path field work efforts required to support project development.

TASK LEVEL DETAILS

Task 1 Project Management

Current Activity:

- Prepared amended Task Orders to fund GIS and cultural resources efforts through June 30, 2011.
- Evaluating existing funding levels for the remaining work on wetlands, lakes and streams, GIS, cultural resources, permitting and stakeholder activities.
- Began preparation of task order amendments to support needed work in these areas.
- Submitted air monitoring and permitting planning report (Task 11) and funding analysis to support project through June 30, 2011 through construction.
- Supported response to coordinating agency comments on Purpose and Need and alternatives.
- Continued interface with the USACE, BLM, and SPCO to ensure that there is full and complete understanding of the project schedule and the need to modify the permit applications to reflect HB 369 direction.
- Met with the BLM to discuss the revised right-of-way (ROW) application and procedures for filing additions/amendments.

- Supported revisions to Permit Acquisition Plan schedule.
- Supported air permit strategy and work plan efforts.

Look Ahead:

- Continue to coordinate with the USACE, BLM and State Pipeline Coordinator regarding revised permit applications submitted in August 2010.
- Continue to coordinate the final field data reports with team leads and coordinate with Baker on routing adjustments.
- Continue to support AGDC at EIS Coordination Team Meetings and discussions regarding alternatives.
- Continue to work with AGDC and Baker on any areas of concern so that route discussion in the EIS and other documents/permits is accurate.
- Coordinate with Baker on the mitigation requirements based on a new release of the project alignment in January 2011.
- Continue to participate in meetings or to present information to support stakeholder discussions and work with AGDC on stakeholder outreach program.
- Complete 2011 work plan and budget.

Concerns:

- Additional funding for GIS and cultural resources tasks required – submitted December 31, 2010. Require discussion as part of bigger picture/work plan for 2011.

Task 2 Cultural Resources

Current Activity:

- Progressed with completion of the 2010 cultural resources technical report.
- Continued to input new datasets and 2010 field results into predictive model.
- Reviewed plans to do borehole testing at the Tanana River at Nenana.
- Prepared funding request based on cost analyses for fieldwork preparation and limited fieldwork through the end of the fiscal year.

Look Ahead:

- Expect submittal of the final technical report for Office of History and Archaeology by March, 2011.
- Continue updating predictive model to support permitting and 2011 field program.
- Start preparing for FY 2011-2012 field season if funded (including research, land ownership, predictive model, and logistics).

Concerns:

- Private property issues within some of the survey segments – need to discuss with Baker and AES GIS.
- Need to determine if there will be funding for FY 2011-2012 fieldwork.

Task 3 Wetlands Analysis

Current Activity:

- Peer review of Draft Preliminary Jurisdictional Determination Report (PJD) completed.
- Preparation of document underway.

- Continue to coordinate with the USACE regarding the draft permit.
- Continue to support EIS effort.

Look Ahead:

- Incorporate client review comments into final version of PJD document.
- Finalized with GIS corridor route and individual field data point location maps for PJD.
- Complete technical editing/word processing of peer-reviewed report.
- Continue to work with Baker to finalize pipeline routing based on wetlands field data results.
- Coordinate with Baker on preparation of Final Section 404 permit. Permit will require drawings of project footprint overlain on wetlands to be depicted in AutoCAD.

Concerns:

- PJD is a very large document (~4,000 pages) and expensive to produce. Recommend that we product minimal number of hard copies to keep costs down and offer DVDs where possible.
- Preparation of Final Section 404 permit will require close collaboration with Baker on the selection of the project footprint.
- Funding of 2011 wetland field work dependent upon agency comments on PJD and data gaps identified in EIS.

Look Ahead:

- Coordinate with Baker on preparation of Final Section 404 permit. Permit will require drawings of project footprint overlain on wetlands to be depicted in AutoCAD.
- Incorporate peer review edits and finalize PJD Report

Task 4 Project Library

Current Activity:

- None at this time.

Task 5 Permitting

Current Activity:

- Prepared updated final Permit Acquisition Plan.
- Continue to coordinate with AGDC team to discuss Tier 2 major permits and air permitting issues, assertions, assumptions, and path forward.
- Continue to coordinate with Baker on GIS data sharing.
- Submitted an engineering Request for Additional Information to Baker to support Tier 1 and Tier 2 permitting efforts.
- Continue to respond to comments on the POD from SPCO, ADF&G, BLM, EPA and the National Park Service (NPS).
- Participated in AGDC and agency team meetings to discuss permit data gaps, subsistence and other permitting issues.
- Coordinating closely with task leads for the Air Permitting Strategy and Biological Assessment regarding associated regulatory issues.

Look Ahead:

- Continue to complete permit applications and respond to agency comments.
- Continue to close data gaps with Baker to support revisions to the POD and preparation of Tier 2 permit applications.

- Continue to coordinate air permitting strategy timeline with major permitting timeline.
- Meet with agencies to discuss revisions to POD and to determine if information provided is adequate and responsive.

Concerns:

- Stream crossings and materials sites continue to be important agency concerns.
- Need to have sufficient information to engage agencies, be responsive to their comments on the ROW/POD and move ahead with permit application submittals.
- Data sharing web-based service needs to be available when response to comments is delivered to agencies.
- Schedule for permit submittal is dependent upon data availability.
- Need to be responsive to agency concerns to ensure positive working relationship.

Task 6 GIS Support

Current Activity:

- Continue to support AGDC through permitting and EIS as needed/requested.
- Completed analysis of stream survey data, lake studies/water volumes, wetlands data and delivered to Baker/ENTRIX.
- Awaiting receipt of GIS data from Baker's ArcReader and WSF to support permitting.

Look Ahead:

- Continue to support data delivery to Baker/ENTRIX as needed.
- Continue to support Cultural Resources Predictive Model development.
- Continue to support permit application preparation as needed.
- Begin support for 2011 field season as directed.

Concerns:

- Reliance on web-based GIS from Baker to support field work and permitting took more time than originally budgeted in April 2010.
- AES internal GIS support continues to expand to support permitting beyond what was originally anticipated.
- Support for remainder of predictive modeling work, permitting, and preparations for 2011 field season need to be adequately funded.

Task 7 Lake Studies/Water Resources Availability Program

Current Activity:

- Completed edits to draft Lake Studies/Water Resources maps for Completion Report.
- Processed data and prepared draft report tables
- Corrected data and re-submitted Standard Form (SF2010-178 to ADF&G

Look Ahead:

- Complete Lake Studies/Completion Report for peer review
- Complete draft proposal of water availability data gaps and field work opportunities for 2011 for AGDC review.
- Prepare scope and cost estimate for 2011 field season to support engineering, permitting and EIS efforts and fill in data gaps identified by state and federal agencies.

Concerns:

- Water availability for the project construction and operation is a long-lead permitting issue. Narrowing down water requirements should be underway to support ice pad construction, ice road construction, earthwork, and hydro-testing.
- The AES 2010 field season for evaluating water availability was a limited program and there remain data gaps that could begin to be filled in the 2011 field season. If there is information from TAPS for the segments north of Livengood, this would help facilitate the permitting effort and supplement the field data results from 2010.
- In addition, a desktop analysis/study is recommended to determine water availability from lakes (winter sources) and streams (summer sources) for the entire route and this could begin in the winter of 2011 whether or not a field season is executed. This information could be useful as part of the project “package”.

Task 8 Stream Survey (Fish/fish habitat) Program

Current Activity:

- Edited data tables for reporting
- Completed charts of fish caught for reporting activities

Look Ahead:

- Complete Stream Crossing Survey Completion Report.
- Continue to support permitting and coordinate with Baker on engineering evaluation.
- Prepare scope and cost estimate for stream survey effort in 2011 to support EIS, permitting, and engineering.

Concerns:

- Stream crossing information is critical to the EIS and permitting effort and is a long-lead permitting issue. Stream crossing methods are a critical agency and potentially local stakeholder issue. Only streams south of Livengood have been surveyed for fish/fish habitat. Data gaps need to be identified (desktop) and a 2011 field season executed to support engineering, permitting and EIS efforts and fill in data gaps identified by state and federal agencies. Need to begin discussions with AGDC, Baker and AES to determine crossing methods, level of detail required and the data gaps.
- There is the assumption that stream crossing/fish habitat data for streams north of Livengood may be readily available from ASPC/TAPS and the AGDC 2010 stream crossing surveys occurred south of Livengood based on this assumption. Obtaining information from TAPS, determining whether it will be acceptable to the permitting agencies and identifying gaps that could be filled in a 2011 field season is time-critical. A desktop study is recommended that would be coordinated with Baker and the agencies to determine anadromous and resident fish species habitat for north of Livengood.
- In addition, a desktop analysis/study is recommended to determine water availability from lakes (winter sources) and streams (summer sources) for the entire route and this could begin in the winter of 2011 whether or not a field season is executed. This information could be useful as part of the project “package”.

Task 9 **No Activity Allocated**

Task 10 **Stakeholder Engagement/Public Outreach Support**

Current Activity:

- Working on issues/white papers for affected communities.
- Waiting for feedback on cumulative timeline, Draft Stakeholder Plan and the stakeholder calendar.

Look Ahead:

- Obtain feedback regarding the stakeholder calendar and Draft Stakeholder Plan.
- Finalize stakeholder engagement schedule for village/community visits.
- After receiving approval, begin planning engagement opportunities that will introduce the project to the various stakeholders.
- Prepare engagement message.

Concerns:

- Various Stakeholder Engagement opportunities are rapidly approaching and AGDC must decide which engagement opportunities, if any, they would like to attend so that AES can properly plan the engagements.

Task 11 **Air Permitting Strategy**

Current Activity:

- AES and Trinity Consultants held December 7, 2010 and December 16, 2010 teleconferences to work toward completing project air permit planning deliverables.
- Met with DoyonEmerald and Baker on December 2, 2010 to discuss project facilities equipment list, firing rates, process flow diagrams, and preliminary emissions estimate.
- Determined that FLM contact was unnecessary at this time, and that contact would occur as part of the normal permitting process. Confirmed through conversations with ADEC that the project should not be subject to any additional or special FLM directed air quality modeling effort.
- Held teleconference with ADEC's Alan Schuler on December 7, 2010 as follow-up to the October 28, 2010 meeting to confirm available meteorological and air contaminant data at Prudhoe Bay; to discuss applicability of National Weather Service (NWS) and/or ADOT/PF Road Weather Information System (RWIS) meteorological stations data near Wiseman, Nenana/Fairbanks, Point MacKenzie/Port MacKenzie, and Anchorage (Merrill Field) for project permitting purposes. Mr. Schuler made the following statements/observations during the December 7, 2010 teleconference:
 - Prudhoe Bay AERMOD data will be available for the AGDC project.
 - Prudhoe Bay PM2.5 data is being collected by BP voluntarily and that they [BP] can terminate PM2.5 data collection without ADEC approval.
 - The National Weather Service (NWS) meteorological station data near Wiseman (CS-4) will not assist the AGDC air permit effort, thus a new meteorological station will be required to permit CS-4.

- “Complex topography” near Wiseman will require the project applicant to site a met station very close to the compressor station final location, i.e., possibly less than 0.5 miles.
- The NWS meteorological station near Nenana (CS-8) may be able to assist the AGDC air permit effort, subject to ADEC approval. The Nenana NWS met data will need to be “packaged” in a manner acceptable to ADEC.
- The ADOT/PF Road Weather Information System (RWIS) meteorological station near Nenana will not assist the AGDC permit effort.
- Two separate meteorological stations may be required to permit CS-8 and the Fairbanks Lateral/NGL Extraction-Straddle Facility since the Straddle Facility seemed to be located adjacent to “complex topography”, i.e., hilly topography and away from the Nenana/Minto Flats flat land.
- The Anchorage Merrill Field NWS meteorological station has a complete and acceptable data set but it is too far from and on the wrong side of the inlet (west side) to use in permitting the project Point/Port MacKenzie (east side) stationary sources (NGL Extraction Facility at MP 39 Beluga Pipeline).
- AGDC air planning activities are more advanced than either of the two larger pipeline projects (APP and Denali) with respect to met/air contaminant station siting between Prudhoe Bay and Livengood, and that ADEC has had little to no conversation with either larger pipeline team aside from the Prudhoe Bay air contaminant collection activity.
- ADEC was unaware of any recent Alyeska Pipeline Service Company (APSC)/TAPS meteorological or air contaminant data, either existing data or planned future collection activity.
- Prepared “working maps” using Baker project route GIS cut-sheets to identify land ownership, ROW, topography, utilities, man-made features (roads, rail, structures) and permitting issues associated with new meteorological/air contaminant stations (i.e., desktop study) for each of the project anticipated stationary source locations. Completed preliminary review of topography maps to assist facility source location selection at the Prudhoe Bay GCF, CS-4 near Wiseman, CS-8 near Nenana, and the NGL extraction facility near Point MacKenzie.
- Submitted the AGDC Air Permitting and Planning Technical Report pursuant to Task Order 05-002 to AGDC on December 22, 2010.

Look Ahead:

- Incorporate changes/edits/recommendations to the draft Technical Report upon receipt of comments from AGDC.
- Prepare scope and cost estimate for the next phase(s) of work required to support air monitoring and permitting tasks.
- Determine potential locations for new meteorological and air contaminant monitoring stations (Desktop exercise). Final site selection is anticipated after field visits (CS 4 – Wiseman; CS 8/Straddle Plant – Dunbar; Tidewater NGL Facility – Point/Port MacKenzie; and possibly Prudhoe Bay) in spring, early summer of 2011.
- Continue to support AGDC efforts to meet with AGIA and Denali pipeline teams to determine potential opportunities for data sharing.

Concerns:

- Aggressive schedule and time sensitive issues, such as meteorological/air contaminant station planning, siting, cost estimate, and installation. “Desktop” monitoring station siting task/activity on schedule but could become an issue if schedule slips.

- Meteorological and Ambient Air Monitoring Stations data acquisition effort may result a very expensive data monitoring program.
- AGDC may need to collect/obtain air contaminant data at Prudhoe Bay due to the uncertainty of BP's continued Alaska operations.
- ADEC is taking a very conservative approach toward "representative" meteorological data collection. Thus, AGDC may need to determine the compressor station location prior to the met station siting and ADEC review/approval process.
- ADEC stated that two separate meteorological stations may be required near Nenana due to the different topography. AGDC may have to budget and plan to site two separate meteorological stations near Nenana/Dunbar.

Task 12 Biological Assessment

Current Activity:

- Continue coordination with AGDC attorney regarding Action Area and Baseline Environment.
- Draft "Description of Species/Environmental Baseline Sections."
- Consult with NMFS and USFWS to acquire their respective lists of ESA species in the action area.

Look Ahead:

- January will be dedicated to completing the BA and discussions of mitigation and Best Management Practices must occur.
- Consultation with agencies and attorney will continue to occur.
- Draft BA prepared and submitted for USACE review and forwarding to federal agencies to assist with preparation of Biological Opinion.

Concerns:

- Schedule remains aggressive.

TASK LEVEL DETAILS**Task 1 Project Management:**

- Ongoing internal project coordination/planning.
- Weekly project meetings.
- Accounting activities, preparing invoices.
- Reviewing sub invoices.
- Reviewing project expenditures, budget.
- Reporting activities.

Task 2 Data Management/Library:

- Quality control activities.
- Rolled out web-based GIS for agencies and third party EIS activities.
- Completed Web-based GIS for read-only access

Task 3 Outreach:

- Coordination meeting with USACE / Agencies.
- Map making

Task 4 Alternative Analysis:

- Complete

Task 5 Supply/Demand Analysis:

- Complete

Task 6 Project Description:

- Complete

Task 7 Cost of Service:

- Complete

Task 8 ROW Application:

- Complete

Task 9 Construction Planning:

- No significant work.

Task 10 EIS Support:

- Coordination with AES, ENTRIX.
- Revising ROW Apps and POD
- Worked on material site use/needs

Task 11 Alignment Investigation:

- Finished computer runs on 500 MSCFD case
- Working on 250 MSCFD dry gas scenario
- Began working on reports

Task 12 Alignment Investigation:

- Working on final reports.

Task 13 Special Design Areas:

- Proposed the drilling program for the Tanana River HDD. Worked on permits for drilling activities.
- Coordinated with ADOT for meeting in January
- Continued work on DNP bypass route/Atigun Pass

Task 14 Geotechnical Data Gap Analysis

- Continued work on this report

Task 15 IPA Pacesetter Evaluation

- No significant work, Task is essentially complete.

LOOK AHEAD:**Task 1 Project Management:**

- Ongoing internal project coordination/planning.
- Weekly project meetings.

Task 2 Data Management/Library:

- Ongoing data management committee meeting.
- Updating and maintaining SharePoint.

Task 3 Outreach:

- Support USACE activities and requests.
- Support Dave Norton, Dave Haugen outreach requests.
- ADOT/Railroad coordination meetings.

Task 4 Alternative Analysis:

- Complete

Task 5 Supply/Demand Analysis:

- Complete

Task 6 Project Description:

- Complete

Task 7 Cost of Service:

- Complete

Task 8 ROW Application:

- Complete

Task 9 Construction Planning:

- Additional coordination w/ADOT and AKRR for crossing configuration.

Task 10 EIS Support:

- Support AES/Entrix/USACE data request for information

Task 11 Cost Optimization:

- Finalize Pipeline runs
- Coordinating w/Doyon-Emerald
- Coordinate with Worley-Parsons as needed

Task 12 Alignment Investigation:

- Finalize hydrology and engineering reports. 99% complete

Task 13 Special Design Areas:

- Meeting with ADOT Bridge on Jan 12.
- Driller selection pending for Tanana River borehole program
- Continue work on Denali Park Bypass route

Task 14 Geotechnical Data Gap Analysis:

- Continue work on Geotechnical Data Gap Analysis

Task 15 IPA Pacesetter Evaluation:

- IPA Pacesetter Evaluation is essentially complete

Comparing Actual vs. Budget of Overall Project Completion

- The overall project is progressing under budget and on schedule.
- Addressing the Upcoming Work Order Packages

Area of Concern, Problems, Decisions Required

- Working on estimate and scope for 2011 field program on a program level for legislative review.
- Need to complete letter to Alyeska for TAPs data in early January
- Continue dialog on Project Execution Plan.

**Stand Alone Gas Line Draft EIS
10-10-907 NTP#1**

Monthly Progress Report – December, 2010.

The following project activities were conducted over the period November 27 to December 31, 2010:

- Reviewed AGDC response letters (December 1 and December 27) to the Corps information request letter dated November 10, 2010.
- Update project schedule.
- Continued to work with ASRC and MJB on GIS data access and use.
- Submitted and received a response to RFI #1 regarding Navigation Data.
- Conducted additional project team meetings to discuss development of affected environment chapters for DEIS.
- Continued to prepare Affected Environment sections on Wildlife, T&E Species, Wetlands Floodplains, Fish, Cultural Resources, Subsistence, Water Resources, Socioeconomics, Visual, Land Use, Navigation, Recreation, Air, Climate Change and Noise. Continued internal review of completed Affected Environment sections.
- Conducted GIS analyses to support Affected Environment Sections.
- Attended Coordination Team meeting on December 7 to discuss development of alternatives.
- Provided note taker and detailed meeting notes for the December 7 meetings (out-of-scope).
- Continued integration of ANGDA B2F data in Affected Environment for Richardson Route.
- Provided subsistence references and data gaps to USACE and BLM per their request
- At request of USACE, revised and resubmitted scope of work and budget for three newsletters.
- Updated website as directed by Corps.
- Maintained project administrative record.
- Updated detailed project expenditures worksheet for monthly reporting.

The following activities are planned for the month of January 2011:

- Include agency comments to December 7 meeting minutes and finalize the minutes for distribution by the Corps (out-of-scope).
- Attend January 4 Project Coordination Meeting.
- Provide note taker and detailed meeting minutes (out-of-scope) for the January 4 meeting.
- Attend and participate in alternatives workshop (mid-January) and assist Corps in finalizing alternatives.
Update website with new documents as necessary.
- Update stakeholder database and administrative record as necessary.
- Continue to formalize “master” document list, incorporate into GIS-based GAP analysis
- Continue writing other affected environment sections for inclusion in an Affected Environment deliverable document.



- Provide support as requested by USACE for additional public comment period.

Outstanding Issues:

- A clear understanding of the final purpose and need, project description, and path forward needs to be established with the applicant and cooperating agencies as soon as possible.
- Development of Alternatives by the USACE and cooperating agencies.
- Development of connected action scenarios for NGLs and future gas users by the USACE and cooperating agencies.
- Determine scope of impacts analysis for Visual Resources and Navigation based upon available data and defined alternatives, in consultation with the USACE and cooperating agencies.
- Determination as to whether the Richardson Alternative will be considered in the DEIS
- Specific ASAP centerline needed to finalize affected environment sections and proceed with impacts analysis.
- Resolution of the timing of integration of summer 2011 field data into the NEPA process.