

Floodplain Statement of Findings
for
Los Alamos Mainline Make Piggable Pipeline Project at Los Alamos
National Laboratory, New Mexico Gas Company,
Los Alamos County, New Mexico

AGENCY: U.S. Department of Energy (DOE) National Nuclear Security Administration (NNSA),
Los Alamos Field Office

ACTION: Floodplain Statement of Findings

DESCRIPTION OF THE PROPOSED ACTION: The New Mexico Gas Company (NMGC) proposes to install new pipe segments through excavation along a 12-inch Main Line (Los Alamos ML) natural gas pipeline in Santa Fe and Los Alamos Counties, New Mexico. The proposed pipeline runs along Los Alamos County, Department of Energy (DOE), tribal and U.S. Forest Service-managed and private property. Work would occur within existing and new right-of-way (ROW) along New Mexico Highway 502 (NM 502). Two locations for proposed excavation and replacement of the line are within floodplain areas in Los Alamos Canyon and Pueblo Canyon along NM 502 with a projected total area of disturbance to be 3.38 acres within the floodplain.

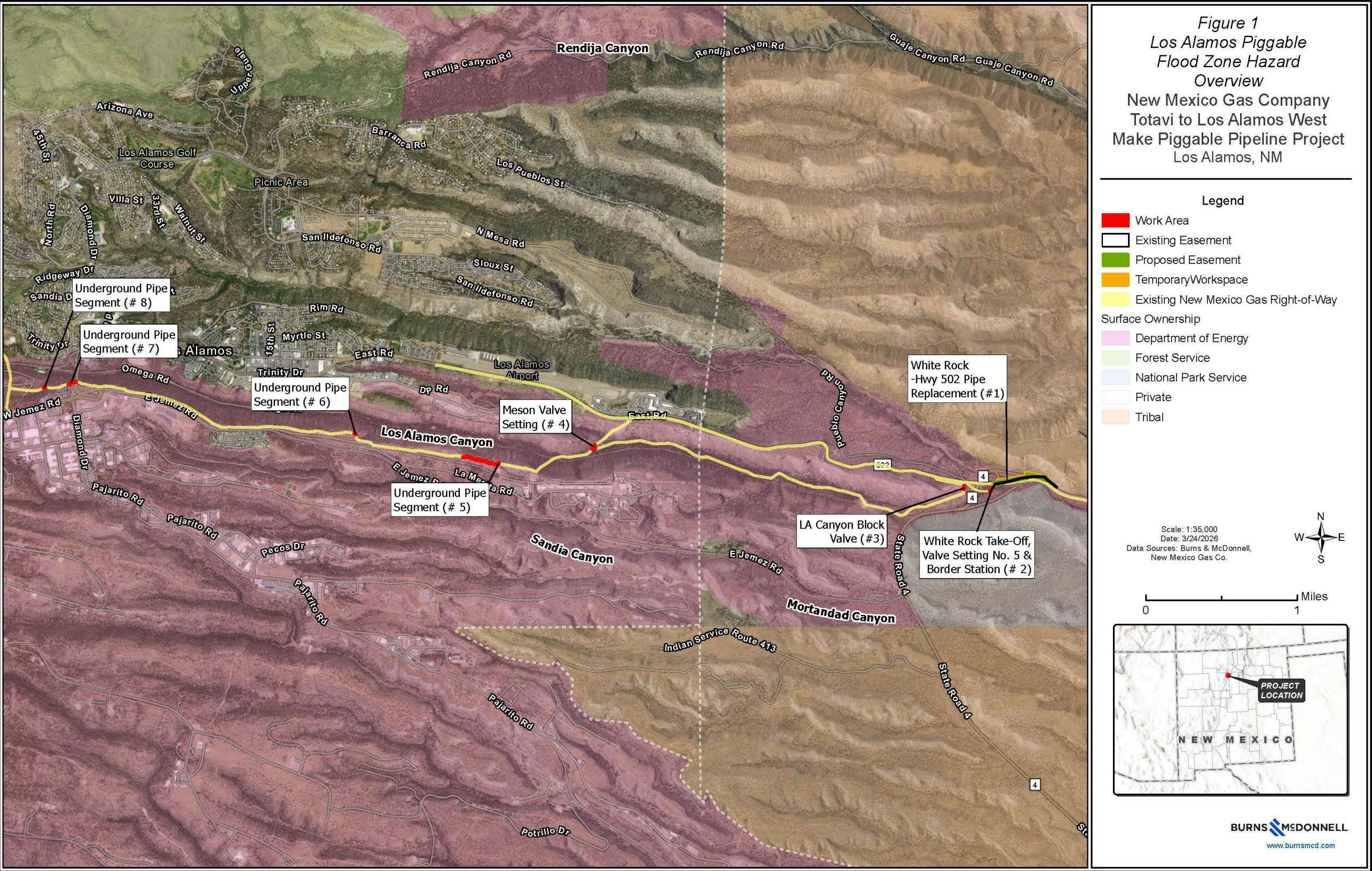
The floodplain assessment was prepared in accordance with DOE regulations set forth in Title 10 Code of Federal Regulations (CFR), Part 1022 (10 CFR 1022), *Compliance with Floodplain and Wetland Environmental Review Requirements*, and complies with the regulations that were current at the time of publication. The need for a floodplain assessment was determined as the project refined scope and specific locations were identified. Public meetings are not a requirement of 10 CFR 1022 which is a separate process from National Environmental Policy Act (NEPA) 42 U.S.C. § 4321 *et seq.*; 10 CFR Part 1021; and the new DOE Implementing Procedures.

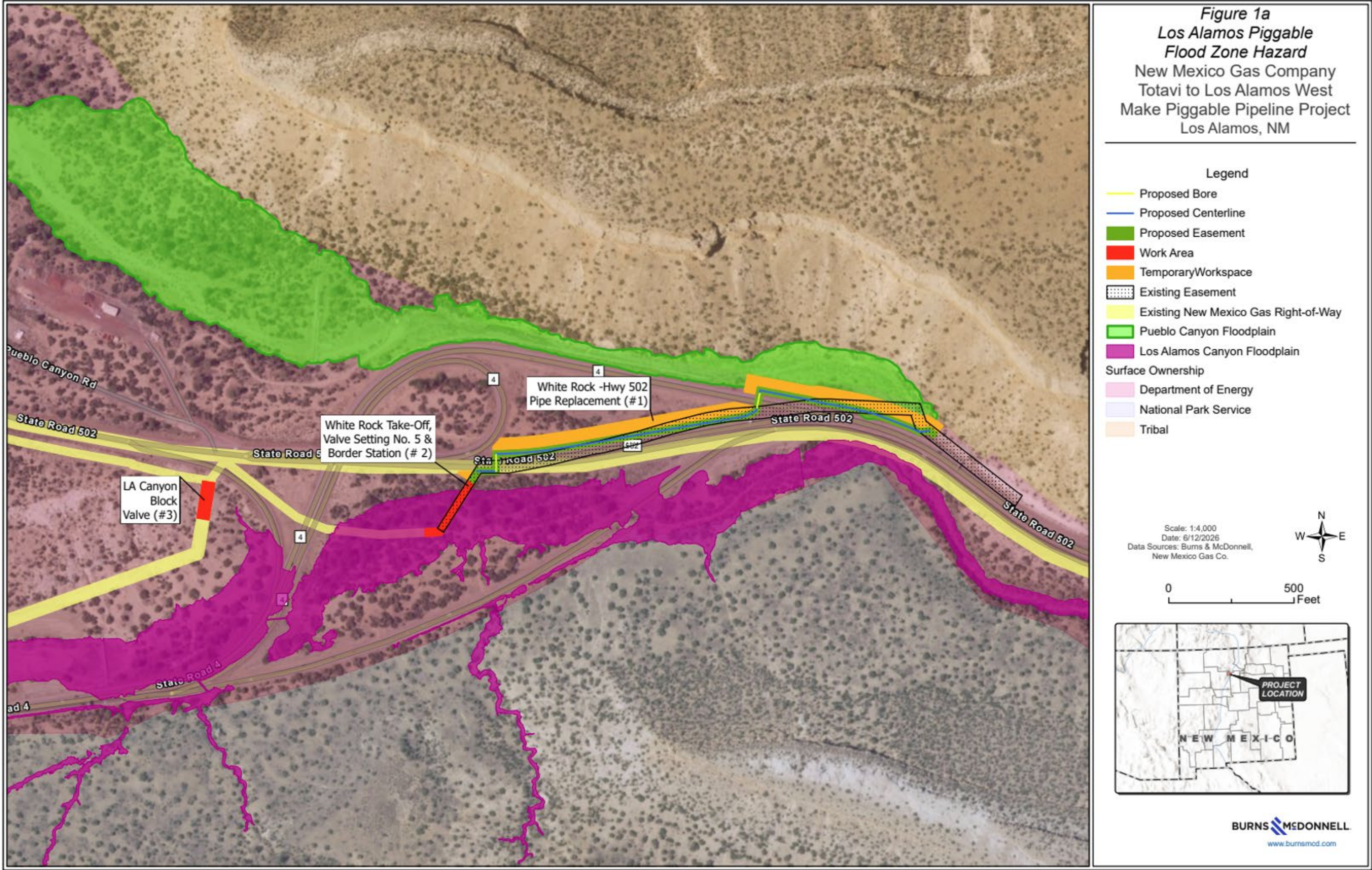
LOCATION WITHIN A FLOODPLAIN EXPLANATION: NMGC will perform maintenance activities within the existing DOE easement in Los Alamos Canyon (Figures 1 and 1a). However, temporary-use areas (TUAs) and a new right-of-way (ROW) will be required at one of the eight proposed locations. The project sites are located along and south of New Mexico Highway 502 (NM 502) and occur across county, DOE, and private lands. Two project locations (Sites #1 and #2) are situated within Federal Emergency Management Agency (FEMA) delineated 100-year floodplains and one project location (Site #4) is located adjacent to a floodplain identified by DOE.

The following project locations and associated activities will occur within floodplain areas:

- NM 502 Pipe Replacement (Site #1): Replacement of an existing 8-inch pipeline with a 12-inch pipeline to accommodate inline inspection (ILI) tools.
- White Rock Take-Off, Valve Setting No. 5 & Border Station (Site #2): Replacement of existing non-piggable above-ground fittings and valve with piggable above-ground fittings and valve. The site will also be upgraded to include remote operation capabilities in accordance with Pipeline and Hazardous Materials Safety Administration (PHMSA) Mega Rule guidance.

These activities will require localized excavation to remove and install new pipe segments where the pipeline is currently buried. Work will occur within the existing NMGC 50-foot ROW and additional ROW and TUAs.





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The scope of the project does not include storage of highly volatile, toxic, or water reactive materials, hazardous waste, or other materials or actions that would increase hazards to human safety, health and welfare. Therefore, this project did not meet the 10 CFR 1022 definition of a “critical action”, and the 100-year floodplain was appropriate for this analysis despite historic records on frequency or intensity of precipitation.

ALTERNATIVES: Alternative alignments outside of the existing NMGC easement were considered but dismissed because they would require extensive acquisitions of new right-of-way, resulting in increased environmental impacts, higher costs, and additional permitting complexities. Limiting the project to the existing easement minimizes disturbance to previously undisturbed areas and reduces the potential for impacts to sensitive resources, including floodplains. Design modifications were incorporated to further avoid and minimize floodplain impacts where practicable. At Meson Valve Setting (Site #4), the construction footprint was adjusted to be entirely outside of the DOE-designated floodplain. At White Rock Take-Off (Site #2), an existing valve station will be relocated to eliminate the need to cross an ephemeral drainage. Alternative construction methods were also evaluated but determined to be impracticable for full project implementation due to technical and economic constraints. Accordingly, no practicable alternatives were identified that would meet the project purpose and need while resulting in fewer impacts than the Proposed Action.

FLOODPLAIN PROTECTION STANDARDS: The proposed project would result in negligible direct and indirect impacts to the Los Alamos Canyon and Pueblo Canyon floodplain. Temporary disturbances within the floodplains would cease following completion of construction activities and would not result in adverse impacts to the floodplain values or functions. Best management practices would be implemented. This proposed project would not significantly modify flow paths within the floodplain from pre-project conditions to post-project conditions. No effects to lives or property associated with floodplain modifications are anticipated

STEPS TO BE TAKEN TO MINIMIZE POTENTIAL HARM TO OR WITHIN THE FLOODPLAIN:

Potential direct and indirect floodplain impacts from release of pollutants to the floodplain and exposure to stormwater would be avoided or minimized through implementation of the following:

- The project does not propose work in any wetlands within LANL property; no wetlands impacts are expected.
- The project area contains potential habitat for two Endangered Species Act-listed species. Sites #7 and #8 occur within “Buffer” habitat as established in the Biological Resources Management Plan for the Jemez Mountains Salamander. “Core” habitat for the Mexican Spotted Owl is found at sites #4, #5, and #6; however, restrictions on construction activities within the Los Alamos Canyon are in place until August 31, 2026, to minimize impacts to the owl during breeding season. No impacts are expected to occur to threatened or endangered species.
- The Migratory Bird Treaty Act (MBTA) prohibits killing migratory birds, including nestlings and eggs in an active nest. Migratory birds breed across LANL property. The risk from this project arises from the potential destruction of active bird nests, defined as nests with eggs or nestlings. NMGC has confirmed that no tree or shrub removal will occur as part of the proposed project; therefore, no impact will occur to birds protected by the MBTA.
- There are two recorded archaeological resources within 50 feet of the sites. NMGC must provide notice to LANL Cultural Resources Program personnel by email at least 30 days prior to the start of work, so they can begin on-site flagging and update activities in preparation for project activities within the proposed project area. The project construction

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activities must stay within the previously-disturbed shoulder of the highway. LANL archaeologists are required to be on site for monitoring when working within 50 feet of a recorded archaeological site boundary. Construction fencing must be installed around the archaeological site prior to the start of work. NMGC must coordinate with the Cultural Resources Program to ensure a monitor is on site during the fence installation. If any issues are encountered, the monitor has the power to pause work and consult with colleagues to determine the best path forward. No impacts are expected to occur to cultural resources. The project must follow the LANL procedure for inadvertent discoveries.

- Equipment would be refueled at least 100 ft. from floodplains.
- Hazardous materials, chemicals, fuels, and oils would not be stored within floodplains.
- Heavy equipment would be excluded from drainage channels, particularly during wet conditions when use could damage soil structure and increase erosion. Temporary mats may be placed to allow equipment to cross drainage within the existing easement without causing damage to the drainage.
- The proposed project is not expected to add contamination from normal operations. Unplanned releases/spills from abnormal operations would be addressed with best management practices for Spill Prevention, Control and Countermeasure program and the Construction General Permit.
- The project is required to comply with the Energy Independence and Security Act, Section 438. Activities include maintaining or restoring to the maximum extent technically feasible the site's predevelopment hydrology through the use of appropriate design and construction strategies for managing stormwater runoff.
- No soil-disturbing activities will occur in the watercourse. The drainage at White Rock Take-Off (Site #2) will be crossed through the easement at an established crossing. No alterations will be made to the drainage for this access. In accordance with U.S. Army Corps of Engineers regulations, a Clean Water Act Section 404 dredge-and-fill permit or New Mexico State Section 401 Water Quality Certification would not be required for this project.
- The proposed project would involve some disturbance of In-Progress Consent Order Sites C-00-00I [Pueblo Canyon system], and C-00-00J [Los Alamos Canyon system]. Since the proposed project cannot avoid disturbance to these Areas of Concern (AOCs), NMGC will contact the LANL Consent Order Site Coordinator prior to the execution of field work. Any disturbed soil from the AOC would be stabilized and managed within the AOC boundary and returned to the point of origin upon completion of the project. All excavated material would be maintained within the AOCs, and none would be sent off-site. The project is required to take precautions to avoid inadvertently transporting potentially contaminated soil from the sites.
- NMGC is responsible to comply with all federal and state regulations, including air quality, water quality, and hazardous materials.

SUPPLEMENTARY INFORMATION:

A Floodplain Statement of Findings was prepared in accordance with Executive Order 11988, *Floodplain Management* and DOE implementing current regulations 10 Code of Federal Regulations 1022 *Compliance with Floodplain and Wetland Environmental Review Requirements*. A summary of the analysis and determination for the *Floodplain Assessment for the Electrical Power Capacity Upgrade* (Floodplain Assessment) is provided in the Statement of Findings

The notification for the availability of the Floodplain Assessment and request for comments was sent to appropriate government agencies, tribes, organizations, and persons known to be interested in or potentially affected by the proposed floodplain action via the GovDelivery system

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and published online on July 16, 2026, for a 15-day public review and comment period on the DOE National Environmental Policy Act (NEPA) website at:

<https://www.energy.gov/nepa/articles/floodplain-assessment-los-alamos-mainline-make-piggable-pipeline-project-los-alamos>

The public review and comment period was extended for another 15-day public review on August 3, 2026 and September 11, 2026. No comments were received.

FOR FURTHER INFORMATION ON THIS STATEMENT OF FINDINGS CONTACT: For further information or questions regarding this Floodplain Statement of Findings contact Ms. Karen Armijo via email at karen.armijo@nnsa.doe.gov; fax (505) 667-5948 or mail to:

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