



Linking Commercial Considerations  
and Environmental Requirements in  
Project Development:  
**Proactive Project Permitting**

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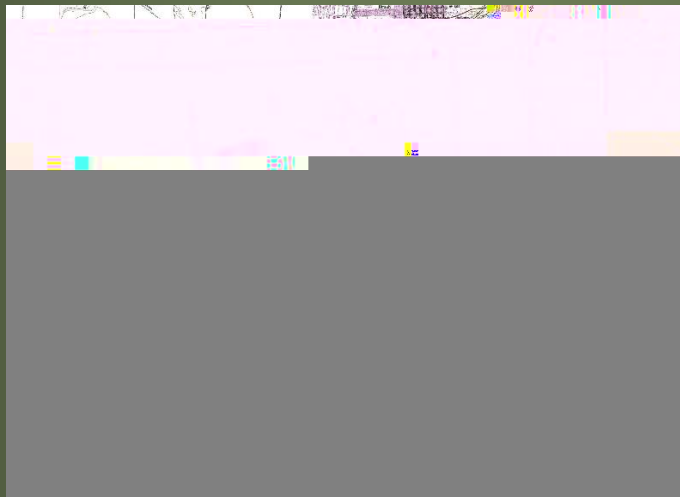
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Tetra Tech

# Save Time and Millions

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- ❑ When to Consider Environmental
- ❑ Defining Your Project
- ❑ Project Siting and Routing
- ❑ Sequencing Development
- ❑ Appropriate Detail Development
- ❑ Your Lead Agency

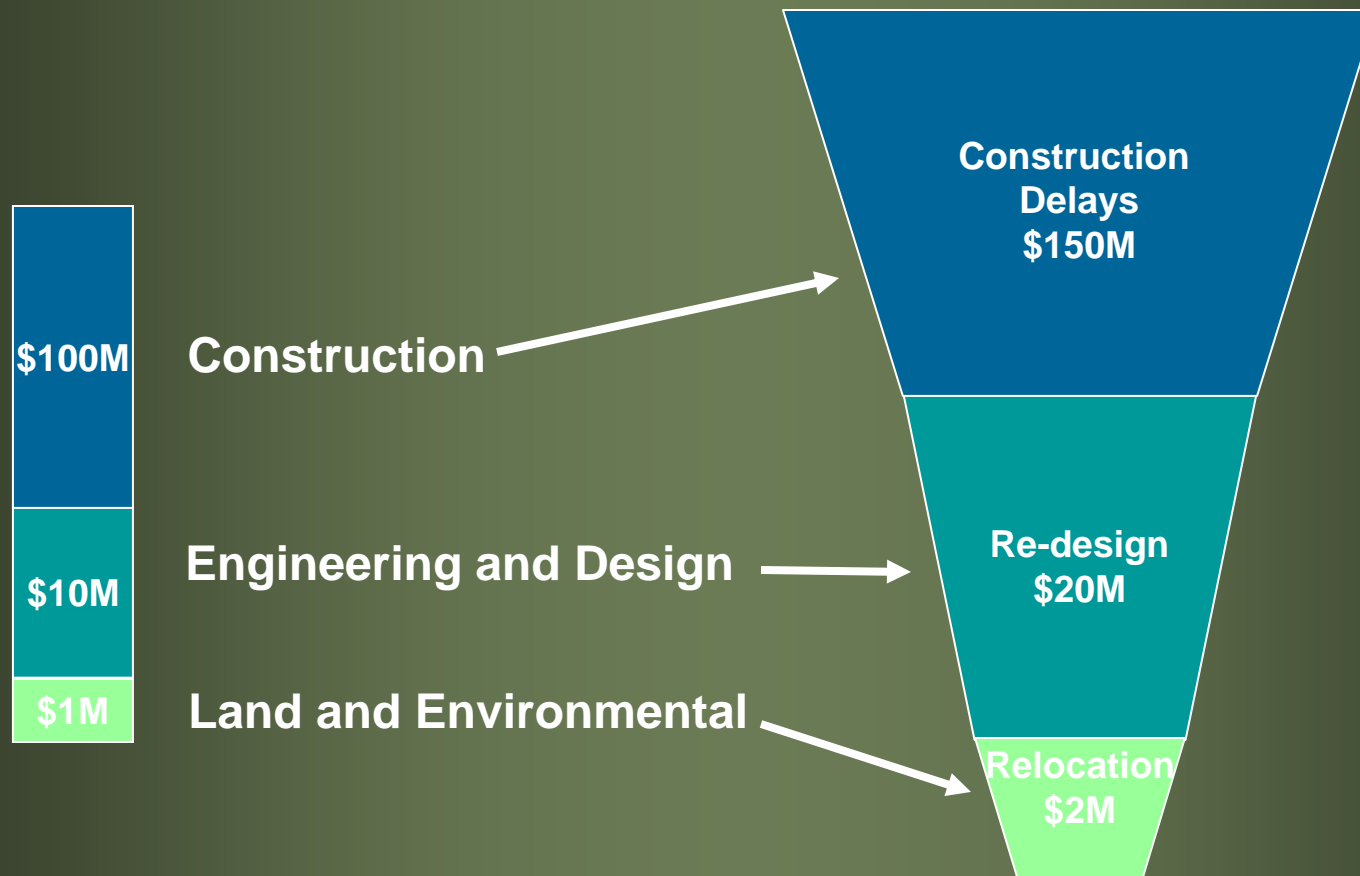


# Environmental Permitting Cost

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# Time and Cost Increases: Environmental Delays



# When to Consider Environmental

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- At Project Concept (New)
- Project Due Diligence (Purchase)



# When to Check in on Environmental

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- Project change of concept
- Identify locations/routes



# Defining Your Project

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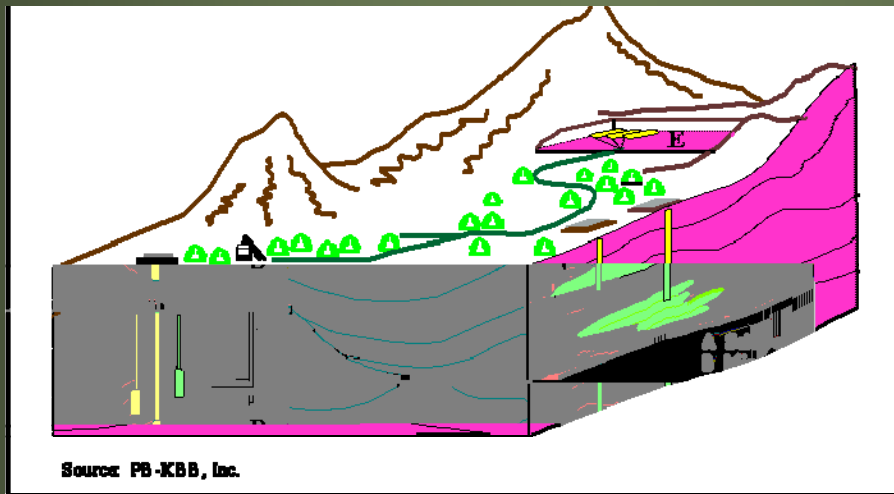
- ❑ Can determine which regulations apply
- ❑ Important Considerations:
  - Federal Drivers: land surface, mineral rights, regulatory driver
  - \$ Value
  - Acreage and Distance
  - Activities
- ❑ Example: salt mining versus cavern creation



# Defining Your Project

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- ❑ Start broadly
- ❑ Maximize flexibility in locations and concepts
- ❑ Develop strategy
- ❑ Quickly narrow down



# Project Siting and Routing

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- Early screening:
  - Federal land
  - Environmental
  - Large land owners
  - Existing ROWs
  - Topography
  - Constructability
- Opportunities and Constraints analysis



# Project Siting and Routing

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- Example: FERC permitting – planning versus construction re-routes



# Appropriate Detail Development

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- ❑ Projects are always evolving
- ❑ “Freeze” the project for permitting
  - Key component engineering
  - Surface facility siting
  - Pipeline routing
- ❑ Plan to submit permit addenda
- ❑ The earlier the freeze, the more work later



# Appropriate Detail Development

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- Revisions require:
  - Landowner negotiations
  - Environmental, cultural, and land surveys
  - Permit revisions
- Why freeze
  - Consistent permits
  - Efficient application preparation
  - Prepare public relations story
  - Revisions are expedited

# Your Lead Agency

- ❑ Select to streamline process
- ❑ Some federally-delegated permits fall under FERC oversight



BLM



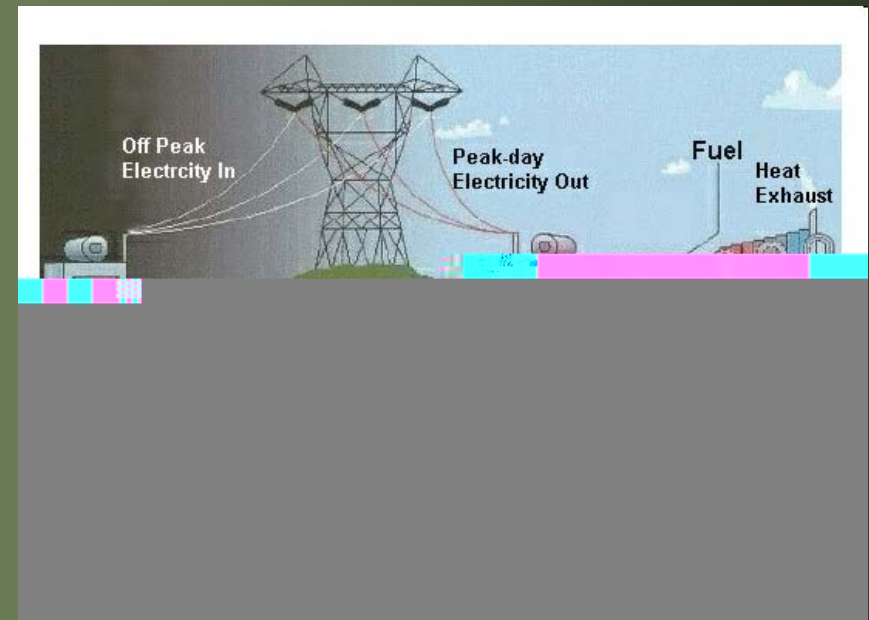
# Your Lead Agency

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- Important to:
  - Develop a regulatory strategy
  - Consult with agencies early
  - Create regulatory certainty for developers and investors
- Example: Projects that cross BLM and USFS can be lead by BLM
- Example: FERC lead over multi-use ROWs

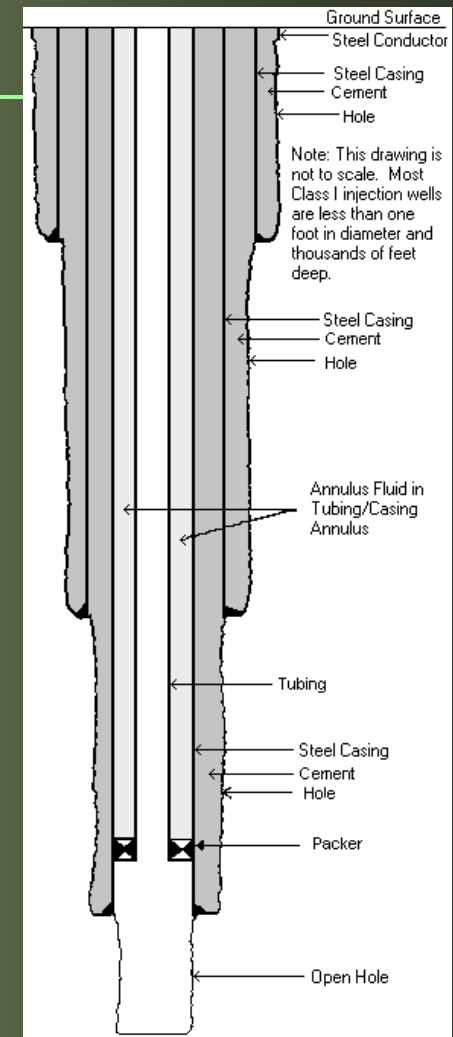
# Compressed Air Energy Storage (CAES) Permitting

- Framework will vary
- Consider in the approach
  - Local regulatory environment
  - Project objectives
  - Location
  - Components



# CAES Permitting

- Underground Injection Control (UIC) permitting likely
  - EPA-delegated program
  - May be influenced by previous use
  - Cavern creation may be different than operations



# Save Time and Millions!

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- ❑ Engage Environmental in Project Development
- ❑ Consider Permitting in Project Definition
- ❑ Opportunities and Constraints for Siting
- ❑ Select Your Detail Development Carefully
- ❑ Freeze the Project for Permitting
- ❑ Seek a Lead Agency; Streamline Permits

# Contact Info

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