



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
www.dnr.illinois.gov

JB Pritzker, Governor
Colleen Callahan, Director

Authorization for Incidental Take and Implementing Agreement

Pursuant to the Illinois Endangered Species Protection Act (Act) (520 ILCS 10/5.5) and the regulations adopted to implement the Act (17 Ill. Adm. Code 1080), authorization is hereby granted to BP US Pipelines and Logistics, Inc. (hereinafter referred to as BP) for the incidental take of the Federally- and State-endangered Rusty Patched Bumble Bee (*Bombus affinis*), the State-endangered Upland Sandpiper (*Bartramia longicauda*) and Loggerhead Shrike (*Lanius ludovicianus*), and the State-threatened Franklin's Ground Squirrel (*Poliocitellus franklinii*). BP holds an easement executed on July 26, 1929, allowing the right upon, over, and through the proposed action area to construct, operate, or maintain the pipeline; including the right of ingress to and egress from such pipeline with no defined width. Most of the proposed work, as well as ingress and egress, will occur within the 50-foot-wide right-of-way, except as needed for additional workspace and as permissible by easement. BP holds an ITA for Franklin's Ground Squirrel (DNR ITA #192) that covers 1.91 acres and is part of this 102-acre area. That ITA remains in full effect. The Illinois Department of Natural Resources (hereinafter referred to as Department) has determined that this taking is incidental to corrosion prevention maintenance, anomaly, and/or dent repair on the petroleum products and crude oil pipelines near Wilmington, Will County, Illinois. This project runs along parts of the eastern and southern edges of non-contiguous portions the Joliet Army Ammunition Depot Illinois Natural Areas Inventory site (INAI #1369), which contains habitat suitable for threatened or endangered species.

Procedural History

A Conservation Plan prepared by Parsons on behalf of BP, was submitted to the Department on October 21, 2019, as a request for authorization for the incidental take of Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel. The Department requested additional information on April 20, and June 19, 2020, to make the Conservation Plan complete as prescribed by Ill. Adm. Code 1080.10. Additional information was received by the Department on May 15, and June 23, 2020. The final Conservation Plan was accepted as complete by the Department on June 23, 2020. The public notice period and public comments will be detailed under #6 of the Compliance section below.

Compliance with the Illinois Endangered Species Protection Act

The Act includes six criteria which must be satisfied for the authorization of incidental take of an endangered or threatened species. These criteria and the Department's determination for each are listed below.

1. □ The taking will not be the purpose of, but will be only incidental to, the carrying out of an otherwise lawful activity:

The stated and apparent purpose of this proposed action is to perform maintenance, such as repairs related to corrosion, repair of anomalies, or installation of cathodic protection equipment. The pipeline project is located within a utility corridor approximately between Manhattan and Symerton in Will County, Illinois. The utility corridor is located along the eastern boundary of the Midewin National Tallgrass Prairie, a prairie reserve managed by the United States Forest Service (USFS). The Wauponsee Glacial Trail, a 22-mile current multi-use recreational trail on a former railroad bed owned by the Forest Preserve District of Will County, is approximately 35 feet east and runs parallel to the pipeline until the intersection of West Arsenal Road and Symerton Road. At the intersection, only the BP No. 1 System crude oil pipeline continues west along the northside of W Arsenal Road until its intersection with IL-53. No excavation work or vehicular/equipment passage will occur on the raised trail berm; all access be through the 50-foot wide easement for the pipelines. Along W. Arsenal Road, the pipeline will be accessed via existing gravel driveway/gravel pad. Heavy machinery and equipment will be used to complete this project, which includes excavation to depths of 4-6 feet and soil stockpiling. Proposed activities may result in direct burial or crushing of, and/or noise and vibration disturbance, and/or habitat disturbance including soil compaction to the Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel during project activities.

Total estimated area of impact within species habitat for the potentially proposed actions is **4,450,000 ft² (102 acres)**. However, it is not anticipated that the entire area will be disturbed during the time period covered by this agreement. BP estimates that approximately 10%, or 10.2 acres, of this area will be impacted during the term of this authorization. The Department concurs that the take of Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel that could result from the proposed project is not the purpose of the BP's activities but is incidental to the carrying out of an otherwise lawful activity.

2. □ The parties to the Conservation Plan will, to the maximum extent practicable, minimize and mitigate the impact caused by the taking:

Proposed avoidance, minimization and mitigation were included in BP's Conservation Plan.

To meet the "maximum extent practicable" standard, additional minimization and/or mitigation measures may be required beyond those proposed by BP, based on the life history needs of the Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel. **All required minimization**

and mitigation measures are presented under the Authorization section below.

3. The parties to the Conservation Plan will ensure that adequate funding for the Conservation Plan will be provided.

BP states that the project will be fully funded by themselves, BP US Pipelines and Logistics, Inc. Further, the Conservation Plan will be fully incorporated into construction plans and training programs.

The Department accepts this provision as assurance that adequate funding will be available to carry out the terms of the Conservation Plan.

4. Based on the best available scientific data, the Department has determined that the taking will not reduce the likelihood of survival or recovery of the endangered species or threatened species in the wild within the State of Illinois, the biotic community of which the species is a part, or the habitat essential to the species' existence in Illinois.

Rusty Patched Bumble Bee (*Bombus affinis*) is a Federally- and State-endangered bee species.

Habitat: The Rusty Patched Bumble Bee is a ground-nesting bee that is found in woodlands, urban parks, and gardens. The females require deserted mammal burrows for nesting.

Distribution: The Rusty Patched Bumble Bee is found in the Eastern United States and into Canada. In the U.S., they are found in the Upper Great Plains States of North and South Dakota at the western extent of their range to the Southeastern States as far south as Georgia. Rusty Patched Bumble Bees are found in the Northeastern states.

Reproduction: Solitary queens emerge in the spring to find nest sites, collect nectar and pollen, and begin to lay eggs, that are fertilized from sperm that was stored since fall mating. Worker bees hatch from the first eggs to collect food, defend the colony, and care for the young. In late summer, new queens and males hatch from eggs. Males disperse to mate with new queens from other colonies. In the fall, the queens that founded the colony, workers, and males all die. The new queens born from the summer eggs enter diapause for the winter.

Population: Many factors have contributed to the decline of Rusty Patched Bumble Bees, including diseases from commercial bumble bee hives, habitat loss due to agriculture and development, pesticides, and climate change. It is also hypothesized that population isolation is leading to decreases in genetic diversity.

Range in Illinois: Rusty Patched Bumble Bees have been observed in 22 of 102 counties in Illinois. There are currently 105 extant Element Occurrence Records for Rusty Patched Bumble Bees in the Illinois Natural Heritage Database.

Incidental Take Authorizations: This is the first Incidental Take Authorization for Rusty Patched Bumble Bees in the State.

Upland Sandpiper (*Bartramia longicauda*) is an Illinois State-endangered bird species.

Habitat: The Upland Sandpipers exclusively live in grasslands. The preferred grassland has level topography with a minimum amount of taller vegetation at the edges. Most habitat has Kentucky bluegrass and other shorter grass species. Additionally, crop fields that have a similar structure to grasslands may be used.

Distribution: Upland Sandpipers are widespread in the United States and are found in 48 of the 50 states. Despite the wide distribution, they are not commonly found in large populations.

Reproduction: Upland Sandpipers arrive in Illinois in mid-April, nests are built in early May, and eggs are laid in mid-May through June. Nests are constructed on the ground in dense grass. There are 4 eggs per clutch, with one brood per year. Fall migration begins as early as July, with Illinois populations leaving in September to winter in Argentina and Uruguay.

Population: Upland Sandpiper are at risk from over hunting, habitat loss due to urbanization, farming practices including grazing animals trampling nests, natural forest succession, pesticide use, and predation. In their wintering grounds, habitat has been converted to agriculture.

Range in Illinois: Upland Sandpipers have been observed in 13 of 102 counties in Illinois. There are currently 15 extant Element Occurrence Records for Upland Sandpipers in the Illinois Natural Heritage Database.

Incidental Take Authorizations: This is the sixth ITA issued for Upland Sandpiper. The previous ITAs have been for wind farm construction and for watermain extensions. This is the first ITA for Upland Sandpiper in Will County.

Loggerhead Shrike (*Lanius ludovicianus*) is an Illinois State-endangered bird species.

Habitat: The Loggerhead Shrike lives in grasslands, prairies, farmland, and other open areas where it can access prey. They prefer areas with interspersed trees, shrubs, hedgerows. Adults can be seen perching on twigs or powerlines. Prey are impaled on twigs, thorns, or between branches of trees and shrubs.

Distribution: Loggerhead Shrike have historically had a widespread distribution across the Lower 48 States and into Canada but appear to be extirpated from the Northeast states.

Reproduction: Nests are built 2.5-4 feet above the ground in dense, often thorny, shrubs or trees, when available. In Illinois, most nests are found in tree lines containing Osage orange, honey locust, and Eastern red cedar. There are 5-6 eggs per clutch, with 1-2 broods per year. Egg laying occurs from late March to mid-April, lasting until early June.

Population: Loggerhead Shrike are declining because of urbanization, vehicular collisions, habitat destruction including high-quality wintering habitat, livestock grazing, and/or pesticide use. The exact cause of decline is not well understood,

because there is suitable habitat in Minnesota, Wisconsin, and Michigan that is not occupied.

Range in Illinois: Loggerhead Shrikes have been observed in 10 of 102 Illinois counties: Carroll, Clay, Edwards, Jasper, JoDaviess, Marion, Perry, Richland, Wayne, and Will. There are currently 14 extant Element Occurrence Records for Loggerhead Shrikes in the Illinois Natural Heritage Database.

Incidental Take Authorizations: This is the fifth ITA issued for Loggerhead Shrikes. The previous ITAs have been for electric transmission lines, wind farm construction, and a watermain extension. This is the first ITA for Loggerhead Shrike in Will County.

Franklin's Ground Squirrel (*Poliocitellus franklinii*) is an Illinois state-threatened mammal species.

Habitat: Franklin's Ground Squirrel is most often found in tallgrass and mid-grass prairies. The species also inhabits forest-field edges, fields, and unmowed strips along railroad rights-of-way. Within Illinois, they are positively related to the presence of smooth brome. They hibernate in underground burrows from September to April, although sporadic daytime emergence may occur with warm temperature fluctuations. Once out of hibernation they forage above ground on plants, insects, amphibians, other small mammals, ground-dwelling birds and their eggs, and carrion during the day and return to their burrows at night.

Reproduction: Breeding occurs immediately after Franklin's Ground Squirrels emerge from hibernation. Gestation lasts 28 days and litters of 5-11 young are born in the burrows from May to June. Adults may hibernate as early as July, but juveniles may remain active until September or October. During the early fall, juvenile males will disperse to different populations or attempt to colonize new areas.

Population: Populations are declining due to habitat loss from urban development and agricultural expansion. Conversion of historical prairie habitats have contributed to the decline of the Franklin's Ground Squirrel in Illinois.

Range in Illinois: The Franklin's Ground Squirrel is found sparsely throughout the northern two-thirds of Illinois. Most recent records in Illinois are from railroad corridors, fence rows, and roadsides. The species has been observed in 8 of 102 Illinois counties: Christian, Cook, Henry, McLean, Peoria, Sangamon, Whiteside, and Will. There are currently nine (9) extant Element Occurrence Records for Franklin's Ground Squirrel in the Illinois Natural Heritage Database. The Department is currently embarking on a comprehensive species survey effort to determine whether any historic records (greater than 10 years) are still viable.

Incidental Take Authorizations: The Department has eleven (11) previously issued or pending Incidental Take Authorizations for Franklin's Ground Squirrel. These include pipelines, transmission and fiber optic lines, recreational use trails, and residential or commercial development projects. Prior authorizations for the species were executed in 2009 with Enbridge Pipeline, and for a previous BP maintenance project for habitat within the same footprint of the currently

proposed BP project. This is the third authorization to be granted for the potential take of Franklin's Ground Squirrel in Will County.

Based on the amount of habitat impacted by this project, the number of known occurrences of Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel in Illinois, an assessment of the potential effect of this project on individual species in the project footprint, the conservation methods included in this authorization for take and the Conservation Plan, and the understanding that vulnerability and recovery information on the species remains limited; it is the conclusion of the Department that the taking anticipated as a result of this project will not reduce the likelihood of survival or recovery of the species in the wild within the State of Illinois, the biotic community of which the species are a part, or the habitat essential to the species' existence in Illinois.

5. Any measures required under Section 5.5(b)(6) of the Act will be performed.

Additional measures are listed below under "Authorization". This authorization is, by definition, subject to those terms and conditions and the signature of a representative from BP indicates their commitment to performing those measures.

6. The public has received notice of the application and has had the opportunity to comment before the Department made any decision regarding the application.

Public notice of the BP's request for authorization of incidental take was published in the *Breeze Courier* (official state newspaper) on June 30, 2020, and in *The Herald-News* on June 30, July 7, and July 15, 2020. A copy of the Conservation Plan was deposited at the Wilmington Public Library, where it was available for public review. The deadline for public comment was August 14, 2020. Comments were received and the applicant provided analysis and response, per Ill. Adm. Code 1080.30.

Authorization

It is the determination of the Department that the measures to be implemented by BP will adequately minimize and mitigate the anticipated taking of Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel associated with the pipeline maintenance in Will County, Illinois. Further the Department has concluded that the taking authorized herein will not reduce the likelihood of survival or recovery of the species in the wild within the State of Illinois, the biotic community of which the species is a part, or the habitat essential to the species existence in Illinois.

All terms and conditions included in the aforementioned Conservation Plan submitted by BP to the Department are incorporated into this agreement by reference and are made a part thereof.

Pursuant to Section 5.5 of the Illinois Endangered Species Protection Act [520 ILCS 10/5.5] and the Administrative Rules for the Incidental Taking of Endangered and Threatened Species [Ill. Adm. Code 1080.40(b)], this authorization is issued subject to the following terms and conditions, which may include additions or modifications to the minimization and mitigation measures proposed by BP in the Conservation Plan:

1. This authorization is effective upon the signature of the Department and shall remain in effect for a period of **twenty-five (25) years** from the date of the Department signature, unless terminated by written agreement of both parties.

Notwithstanding the above paragraph, due to the length of this Authorization, the Department reserves the right to reassess the terms of this Authorization every five years. If during reassessment the Department determines that the Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel have become more imperiled than when the species and impact analyses were initially conducted, the Department may request an amendment to this Authorization or additional minimization or mitigation by BP. Further, if during reassessment the Department determines that the level of minimization and mitigation no longer meets the requirement of 520 ILCS 10/5.5 for minimization and mitigation to the maximum extent practicable for the potential take, the Department may request an amendment to this Authorization or additional minimization or mitigation by BP. If the Department and BP cannot reach an agreement, this Authorization will be terminated. Termination of this Authorization under this provision does not prevent BP from applying for a new Incidental Take Authorization for this project.

This authorization may be revoked pursuant to the Act and Ill. Adm. Code 1080.80(b) if the Department finds that BP has failed to comply with any of these terms and conditions or has been responsible for the taking of the Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel beyond that which is incidental to maintenance for the petroleum products and crude oil pipelines near Wilmington, Will County, Illinois.

2. The effective period of this authorization may be altered by mutual written agreement between BP and the Department. The Illinois Endangered Species Protection Board shall be notified of such alteration.

Any substantive changes, including but not limited to a change in the project footprint or a change in the State-listed species which could potentially be affected, will require that a new Conservation Plan be submitted to the Department to initiate the review and public notice process as required by the Act.

3. This authorization may only be transferred upon approval and written authorization by the Department.

4. □ Notification to all on-site personnel shall be provided on the sensitive biological resources in the area; the identification of Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel; regulations protecting the species; where the species might be found; avoidance areas; travel restrictions for equipment; how to report sightings or incidents that may involve take; the importance of avoiding take of the species; and response protocol if the species are found, including the chain of response personnel. **BP shall submit a copy of the education materials to the Department.**
5. □ The Department reserves the right of entry by its staff or representatives to inspect potential habitat and species management practices.
6. □ Upon request, species researchers shall be provided opportunities to conduct studies, which may include but not be limited to surveys, telemetry, soil temperature readings, and burrow photography within BP's easement in collaboration with the Department, USFS, Forest Preserve District of Will County, and/or Universities to gather necessary life history data to improve future conservation efforts. Any research activities shall require BP's written consent and follow all safety practices required by BP.
7. □ Biological consultants employed by BP shall hold the necessary permits for work with non-listed and listed species; these include an Illinois Department of Natural Resources (IDNR) Scientific Collection Permit as authorized under 17 Illinois Administrative Code 520, and an IDNR Endangered Species Permit as authorized under 17 Illinois Administrative Code 1070.
8. □ BP shall notify the Department's Endangered Species Program by email correspondence of construction commencement and completion of the pipeline project. A **project status report** shall be submitted to the Department within **90 days** following completion of **each maintenance repair episode** (current and future) summarizing the implementation of minimization, mitigation, and restoration measures and evaluating the effectiveness or status of those measures and shall include a project photo log. The report shall also include a map and GPS coordinates of any listed species found within the project footprint, description of any injuries or mortalities, and the disposition of any individuals that were injured or killed.
9. □ Notification of any Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and Franklin's Ground Squirrel present during performance of the project shall be reported electronically to the Department within 48 hours of discovery accompanied by location information (photograph, map, and GPS coordinates). Any discoveries of additional State-listed species beyond those identified in this agreement **halts work** and shall be reported to the Department within 48 hours accompanied by location information.

10. BP shall conduct, or cause to be conducted, the following pre-construction, construction, and/or post-construction efforts for current and future pipeline maintenance:
- a. Any future work shall be submitted to the Department's EcoCAT system to verify that no additional listed species are at risk in the proposed action area.
 - b. No new structures shall be built in the ROW. This provision excludes the placement of anode junction boxes, which sit on a 2-foot-by-2-foot footprint and are 4 feet tall.
 - c. To the extent possible, pipeline maintenance shall be scheduled during the species' active season (May-October) to avoid lethal take within potential burrows. It is understood by the Department that pipeline maintenance activities may be deemed necessary for safety and may therefore be unable to avoid hibernation. However, the pipeline easement occurs on ground level with the surrounding landscape, not along a berm.
 - d. Where feasible, BP will conduct drone surveys of their pipeline ROWs to assess the area for the presence of suitable habitat for the Franklin's Ground Squirrel, Rusty Patched Bumble Bee, Upland Sandpiper, and Loggerhead Shrike and to identify high risk areas for take.
 - e. A field biologist shall participate in a pre-construction kick-off meeting to discuss restrictions to avoid and minimize take.
 - f. At the start of each workday and as vehicles traverse the access route, a qualified biologist will perform a visual survey of the access path for new burrows or species individuals ahead of the lead vehicle.
 - g. Access lanes shall be mowed ahead of use to enhance the visibility of species.
 - h. All vehicles and equipment shall maintain a speed of 10 miles per hour along access routes.
 - i. Burrows and nests shall be flagged and avoided.
 - j. If a Franklin's Ground Squirrel does not vacate the site after clapping and yelling, a qualified and permitted field biologist shall trap the individual and relocate it to a safe site less than 500 feet away, and not across a roadway.
 - k. The following measures shall apply to soil stockpiles
 - 1. Soil stockpiles are to be limited in size, and less than 2 feet tall and in windrows not mounds.
 - 2. Soil stockpiling is to be limited in duration and shall be moved after 3 days.
 - 3. Soil stockpiles shall be inspected by the field biologist to ensure that Franklin's Ground Squirrels are not burrowing into the soil. Clapping and yelling will be used to scare any animal from the stockpile. If that does not work, then the pile shall be covered with a geotextile fabric to prevent further attempts.
 - b. Prior to removal all trees and shrubs must be inspected by a field biologist for evidence of loggerhead shrike nesting.
 - l. Once activity is completed at each site, soil and surrounding terrain shall be restored to as good or better condition prior to excavation.
 - m. Soil shall be scattered if conditions do not allow for immediate restoration.

- n. Should additional excavation be required, restoration shall be performed immediately upon completion of corrective action.
- o. Post-construction, impact areas shall be successfully revegetated with the seed mix prescribed by, and to the satisfaction of, the USFS' Midewin National Tallgrass Prairie biologists.
- p. Maintenance of the right-of-way shall include limited frequency mowing to control the colonization of woody vegetation and shall be performed between November and April.

11. BP shall conduct, or cause to be conducted, post-construction monitoring.

- a. Any future work shall be submitted to the Department's EcoCAT system to verify that no additional listed species are at risk in the proposed action area.
- b. Franklin's Ground Squirrel: A thorough post-construction presence/probable absence trapping survey shall be performed by a qualified permitted biologist **within 1 field season** of the initial work and any future pipeline maintenance projects, as well as at the closing of the agreement (Year 25) with no greater than six (6) total trapping surveys required during the term of the authorization.
- c. Rusty-patched Bumble Bee: If construction takes place in upland grass habitat, between mid-March and mid-October, one post-construction visual encounter survey shall occur **within 1 field season** of maintenance activity.
- d. Loggerhead Shrike: If construction takes place in upland grass habitat where they are likely to forage between mid-March and mid-October, one survey shall occur **within 1 field season** of maintenance activity.
- e. Upland Sandpiper: If construction takes place in upland grass habitat where they are likely to forage between mid-March and mid-July, one survey shall occur **within 1 field season** of maintenance activity.
- f. For any species, no more than six (6) total surveys will be performed during the term of this permit.
- g. If no further work occurs on the right-of-way after the initial maintenance activity, performance of the surveys following Year 1 work and during Year 25 shall be adequate for post-construction monitoring compliance.
- h. A report including, but not limited to, a description of the survey methodology utilized including duration, date, time, habitat description, photographs, and a map of survey locations and the locations of Franklin's Ground Squirrels or burrows shall be provided to the Department within 90 days of completion of each survey.**

12. Mitigation to the maximum extent practicable is required by the Act. Mitigation requirements for this authorization are as follows:

- a. BP shall provide compensatory mitigation to the Illinois Wildlife Preservation Fund to be earmarked to bring conservation benefit to the Rusty Patched Bumble Bee, Upland Sandpiper, Loggerhead Shrike, and/or Franklin's Ground Squirrel.

- b. For work planned immediately, BP shall provide mitigation in the amount of **\$11,700**. This mitigation value shall be paid **within 90 days of execution of this agreement**.
- c. For future work, BP shall provide compensatory mitigation for impacts that take place in suitable habitat for listed species, as identified in surveys by a biologist hired by BP. The rate for compensatory mitigation in these areas shall be calculated at a mitigation ratio based on impact area pursuant to the Conservation Plan. Mitigation value shall be paid **within 90 days of completion** of individual pipeline maintenance activities within the defined project area and duration.
- d. If additional work is required in the same footprint more than once during the term of the permit, the Department shall be given an opportunity to review the potential impact of the project to determine if additional mitigation will be required.
- e. Mitigation payments are nonrefundable, including events of revocation or termination.

Mitigation values are based on the Department's best current understanding of the species life history needs, real estate values, and impact analysis relevant to the project site's proposed conceptual design elements available at the time of review.

13. All reports, notifications, and other project documentation shall be submitted to:

Illinois Department of Natural Resources
Office of Resource Conservation
Endangered Species Program – Incidental Take Authorization Coordinator
One Natural Resource Way
Springfield, IL 62702-1271

(217)557-8243
DNR.ITAcoordinator@illinois.gov

The Department's Endangered Species Program shall provide all reports required under this agreement to the Illinois Endangered Species Protection Board and to the Department's Natural Heritage Database.

- 14. The BP official identified below is authorized to execute this agreement. Execution by BP indicates acceptance of all terms and conditions described in this authorization.
- 15. The execution of this agreement does not waive or excuse the responsibilities of BP to comply with other Federal, State, or local regulations, including but not limited to obtaining any required permits for the execution of this project.

For the Illinois Department of Natural Resources:

Christopher L. Young

Mr. Christopher L. Young, Director
Office of Resource Conservation

Dec. 11, 2020

Date

For BP US Pipelines & Logistics, Inc.:

Jeffrey R. Turner

Mr. Jeff Turner
Area Manager

12/11/2020

Date