

## **Public Comments and BLM Responses on the Draft SEIS State Agencies**

**Comment Number**            **SA-1-1-G-1**

**Comment**

I ask the BLM to ensure that future scoping documents fully and specifically disclose the number of anticipated wells, the number of drill pads, as well as the anticipated level of surface disturbance with sufficient accuracy to provide a fair opportunity for public comment and State participation through active involvement by cooperating agencies.

**Response**

The BLM will strive for more informative scoping.

**Comment Number**            **SA-1-2-G-2**

Currently there is unleased acreage in the PAPA that is available for lease. My request is that no additional acreage be leased until the final Pinedale Resource Management Plan (RMP) Record of Decision (ROD) is signed. In order to protect big game herds while the development of the core is occurring, unleased parcels in the PAPA should only be leased with a No Surface Occupancy (NSO) stipulation or in the alternative, leasing should be deferred until full monitoring capability is in place and development of the core area is completed.

**Response**

This was included in Alternative E in the Revised Draft SEIS.

**Comment Number**            **SA-1-3-G-3**

**Comment**

Should operators whether proponents or other, agree to suspend their leases to protect the PAPA flanks during the core development, the BLM should encourage and support suspension.

**Response**

Thank you for your comment. Lease suspensions were contemplated in the Revised Draft SEIS.

**Comment Number**            **SA-1-4-G-4**

**Comment**

To honor existing leases, development should be allowed to go forward. However, with the recent decline in mule deer herd numbers and loss of sage grouse leks in the Pinedale Field

Office (PFO) territory, I request that development outside the core be limited in such a manner that there should be no incremental negative impacts on environmental, wildlife, agricultural or cultural resources. State agencies will make specific recommendations regarding the percent of surface disturbance per section or alternatively the number and size of well pads that should be allowed for flank development, and I ask that you use these specific recommendations in the final ROD.

**Response**

BLM will work with state agencies to minimize impacts to resources.

**Comment Number**            **SA-1-5-MO-1**

**Comment**

All developers operating in the PAPA should be required to commit to fund monitoring commensurate with the level and pace of development that actually occurs.

**Response**

BLM anticipates that the appropriate level of monitoring will continue.

**Comment Number**            **SA-1-6-G-5**

**Comment**

I ask the BLM to carefully consider language being drafted by the Wyoming Game & Fish (WG&F) as well as industry as to how the core boundaries might be adjusted. The language must minimize or eliminate impacts to the functionality of crucial habitat and meet the bottom line goal of no additional degradation to wildlife carrying capacity due to habitat or migration corridor disturbance or destruction.

**Response**

Input from the Wyoming Game & Fish Department was considered in the Revised Draft SEIS.

**Comment Number**            **SA-1-7-G-6**

**Comment**

There are also continuing concerns as to the ultimate timing and phasing for development activities of the various identified core development areas. The WG&F are coordinating their concerns with the proponents and will provide their recommendations. I ask that you adopt timing and phasing schedules which support the bottom line objective.

**Response**

Input from the Wyoming Game & Fish Department was considered in the Revised Draft SEIS.

**Comment Number SA-1-8-MO-2****Comment**

The Final SEIS needs to contain a very complete framework with regard to the monitoring expectations needed in order to meet bottom line objectives and to insure that development activities comply with the very critical mitigation thresholds identified by Wyoming Game and Fish, Wyoming Department of Environmental Quality (WDEQ) and Wyoming Department of Agriculture (WDA).

**Response**

The input from the state agencies was considered in the Revised Draft SEIS.

**Comment Number SA-1-9-MO-3****Comment**

Wildlife and air quality monitoring are the specific two areas that need to be specifically outlined in the ROD so the expectations of the BLM and operators are fully disclosed and any potential for unexpected surprises to any party are limited.

**Response**

The input from the state agencies was considered in the Revised Draft SEIS.

**Comment Number SA-1-9-MO-4****Comment**

Between the draft and final SEIS I request that the BLM coordinate with WG&F, WDEQ and WDA on the required monitoring that needs to be identified and contained in the ROD.

**Response**

The BLM will continue to coordinate with regulatory and land management agencies.

**Comment Number SA-1-10-MO-5****Comment**

The following monitoring efforts should be required: 1. Reclamation monitoring. 2. Monitoring to make sure mitigation practices are applied correctly. 3. Monitoring as to whether mitigation practices are effective. 4. Population monitoring for various species of affected wildlife.

**Response**

BLM anticipates that the appropriate level of monitoring will continue. Your specific requests for monitoring will be considered as BLM issues a Decision.

**Comment Number**                    **SA-1-11-MO-6**

**Comment**

With the proposed increase in the pace of natural gas development in the PAPA-SEIS, personnel must be specifically identified and devoted to the monitoring, inspection and enforcement of reclamation activities, air quality standards, wildlife objectives and negative impacts on other valuable resources.

**Response**

Thank you for your comment.

**Comment Number**                    **SA-1-12-G-7**

**Comment**

Because of the effort of the proponents to reduce impacts to the PAPA, no additional exceptions to seasonal stipulations should be allowed either on or off the crest unless documented to be minor in nature and agreed to as part of the regular review meetings.

**Response**

Exceptions are allowed for in the Pinedale RMP and the PAPA SEIS will be in conformance with the Pinedale RMP.

**Comment Number**                    **SA-2-1-PBO-1**

**Comment**

We recommend that remaining language in this section be included in the text of the ROD or in Appendix E in its entirety to articulate the intent of this plan, and to serve as an introduction to the more specific items in Attachment 4 - Wildlife and Habitat Mitigation Plan found in Appendix C: (See Letter SA-2 for complete comment)

**Response**

Thank you for your comment. Please see the Revised Draft SEIS. The BLM will consider this in issuing a decision.

**Comment Number SA-2-2-PBO-2****Comment**

In this performance-based plan, the following are the Performance Objectives/Guiding Principles that were used to develop this plan. We recommend these should be included in their entirety in the ROD and be used to implement the plan: (See Letter SA-2 for complete comment)

**Response**

Thank you for your comment. Please see the Revised Draft SEIS. The BLM will consider this in issuing a decision.

**Comment Number SA-2-3-W-1****Comment**

Major Components for Wildlife. We recommend they be included in their entirety in the text of the ROD, with a reference to the more detailed implementation of them in Attachment 4 - Wildlife and Habitat Mitigation Plan in Appendix C. Also, the results of implementing these items should be included in Chapter 4, Environmental Consequences. (See Letter SA-2 for complete comment)

**Response**

Thank you for your comment. Please see the Revised Draft SEIS.

**Comment Number SA-2-4-AP-1****Comment**

The SEIS describes a performance-based plan, which relies on a continual process of monitoring and feedback to guide both future development as well as mitigation activities. Toward that end, we recommend the ROD contain the specific language as provided below. (See Letter SA-2 for complete comment)

**Response**

Thank you for your comment. Please see the Revised Draft SEIS. The BLM will consider this in issuing a decision.

**Comment Number SA-2-5-M-1****Comment**

Also, the specifics of mitigation thresholds and the response process for implementing mitigation referenced in the last bullet (Attachment 4 - Wildlife and Mitigation Plan in Appendix

C) are found in the Attachment to this letter, which has been developed in detail with the operators, and we recommend it also be included in its entirety as part of Attachment 4, Appendix C. (See Letter SA-2 for complete comment)

**Response**

Thank you for your comment. Please see the Revised Draft SEIS. The BLM will consider this in issuing a decision.

**Comment Number**            **SA-2-6-G-1**

**Comment**

We recommend the following items in particular be included in the description of development activities in these DA's (these should be contained in the more detailed description as proposed by the operators): (See Letter SA-2 for complete comment)

**Response**

Please see Revised Draft SEIS.

**Comment Number**            **SA-2-7-G-2**

**Comment**

We recommend the operators focus development in DA-4 and DA-5 until DA-2 is completely developed.

**Response**

Please see Revised Draft SEIS.

**Comment Number**            **SA-2-8-G-3**

**Comment**

We recommend the ROD include language that the Review Team will emphasize minimizing development impacts to DA-3 until DA-2 is completed as they provide their recommendations for development in the annual meetings.

**Response**

Thank you for your comment. Please see the Revised Draft SEIS. The BLM will consider this in issuing a decision.

**Comment Number SA-2-9-G-4****Comment**

As noted above, our recommendation would be, until DA-2 was finished, for development to proceed in DA-4 as well as DA-5 before developing DA-3.

**Response**

Thank you for your comment.

**Comment Number SA-2-10-G-5****Comment**

We particularly recommend that the operators in DA-5 all take part in and utilize the central gathering system. During the lengthy production phase for this development, this would be a major benefit in reducing impacts to sage grouse.

**Response**

Thank you for your comment. See Revised Draft SEIS.

**Comment Number SA-2-11-LS-1****Comment**

We strongly recommend the BLM also contribute to this effort by committing, in the ROD, to suspend leasing of any currently unleased parcels in the area at least until the core area has been developed and reclamation has proceeded there to the point where habitat on the core area is again functional.

**Response**

Please see the Revised Draft SEIS, specifically Alternatives D and E.

**Comment Number SA-2-12-G-6****Comment**

Section 2.4.2.3 Alternative B

Recommend including in the FEIS, Operator defined Concentrated Development Areas as described in Alternative B. Each of the three individual CDAs would not exceed 8 square miles; however they would be tightly grouped, with the combined area of the three not exceeding 19 square miles.

**Response**

Thank you for your comment.

**Comment Number**            **SA-2-13-G-7**

**Comment**

Section 2.4.2.3 Alternative B

Recommend including in the FEIS, Operators would attempt to fully develop each multi-well pad to the approved bottom-hole spacing before moving drilling rigs off of pad.

**Response**

Thank you for your comment.

**Comment Number**            **SA-2-14-RC-1**

**Comment**

Recommend including in the FEIS, Interim reclamation would occur for pads not scheduled for development activity within 2 years.

**Response**

See Revised Draft SEIS reclamation plans, specifically Alternative D.

**Comment Number**            **SA-2-15-GW-1**

**Comment**

Operators have identified a need for injection wells to be used for disposal of produced water. These wells should be restricted to the core development area.

**Response**

BLM understands the desire of the WGFD to keep development concentrated to the Core Area - see Alternative E in the Revised Draft SEIS. There are valid leases off the core development area that could still be developed.

**Comment Number**            **SA-2-16-T-1**

**Comment**

2000 PAPA ROD Section headed Seasonal Road Closure

Specific existing seasonal road closures from January 15-April 30, outside of the core area, should remain in force and be carried forward to the final ROD.

**Response**

Thank you for your comment. The Revised Draft SEIS contains transportation plans. The BLM will consider this in issuing a decision. This may be carried forward from the PAPA ROD.

**Comment Number**                    **SA-2-17-T-2**

**Comment**

2000 PAPA ROD Section headed Seasonal Road Closure  
The Burma Road should be gated and restricted from use by industry year-long with the exception for maintenance on Shell's approved injection well.

**Response**

Thank you for your comment. The Revised Draft SEIS contains transportation plans. The BLM will consider this in issuing a decision. This may be carried forward from the PAPA ROD.

**Comment Number**                    **SA-2-18-W-2**

**Comment**

Seasonal wildlife stipulations included in 2000 ROD for sage-grouse, big game and other wildlife should apply to all activities outside of the core development boundary.

**Response**

Exceptions are allowed for in the Pinedale Resource Management Plan. The SEIS will be in conformance with the existing Pinedale Resource Management Plan.

**Comment Number**                    **SA-2-19-W-3**

**Comment**

With relaxation of seasonal stipulations in the core development area, exceptions outside the core should be permitted for emergency only.

**Response**

Exceptions are allowed for in the Pinedale Resource Management Plan. The SEIS will be in conformance with the existing Pinedale Resource Management Plan.

**Comment Number SA-2-20-W-4/AP-2****Comment**

Current Management Area protections should be carried forward until the development areas reach those MA's. How these restrictions would be lifted would be considered at the Annual Meetings and only when the concentrated development reaches those designated areas.

**Response**

Please see the Revised Draft SEIS, specifically Alternative E.

**Comment Number SA-2-21-LS-2****Comment**

Areas identified in the 2000 ROD as "withheld from leasing" should be carried forward in the new ROD.

**Response**

This will be provided in the Final SEIS.

**Comment Number SA-2-22-LS-3****Comment**

All BLM lands not currently leased within the PAPA boundary should be withheld until current core development is complete and reclamation has restored the vegetation to functioning habitat for wildlife needs.

**Response**

Please see the Revised Draft SEIS, specifically Alternative E.

**Comment Number SA-2-23-G-8****Comment**

We encourage inclusion of the Review Team and planning processes as noted in our comment letter.

**Response**

Thank you for your comment.

**Comment Number SA-2-24-G-9****Comment**

We encourage consideration of the delineation drilling process as developed by the operators and summarized in our comment letter.

**Response**

Thank you for your comment.

**Comment Number SA-2-25-G-10****Comment**

We recommend incorporating the conservation measures in the operators' development plan, as summarized in our comment letter.

**Response**

Thank you for your comment.

**Comment Number SA-2-26-G-11****Comment**

This language would result in unnecessary additional surface disturbance, and we recommend that additional drilling be done on existing well pads to the maximum extent possible. If ongoing reclamation is disturbed as a result, that would be preferable to construction of a new well pad.

**Response**

Thank you for your comment. The BLM will consider this in issuing a decision.

**Comment Number SA-2-27-G-12****Comment**

For the final SEIS and ROD, we encourage consolidation of disturbance, faster development of each area to minimize the temporal disturbance, and faster reclamation of surface disturbance, which can be achieved through implementation of the development plan as indicated in our comment letter.

**Response**

See Revised Draft SEIS and respective reclamation plans for each alternative.

**Comment Number SA-2-28-G-13****Comment**

In the Final SEIS and ROD, we encourage a development plan that would concentrate delineation and development activities to avoid these results, as noted in our comment letter.

**Response**

Thank you for your comment. The BLM will consider this in issuing a decision.

**Comment Number SA-2-29-G-14****Comment**

In the Final SEIS and ROD, we encourage a development plan that would provide the best up-front planning to avoid the need for items like exceptions while provided assurances for continued functional habitat. These items are contained in the planning components outline in our comment letter.

**Response**

Please see Revised Draft SEIS.

**Comment Number SA-2-30-W-5****Comment**

In the DA-4 bullet, the sentence "BLM would temporarily relax stipulations that would otherwise protect greater sage-grouse leks and greater sage-grouse nesting habitat" should not include the leks.

**Response**

This text has been corrected in the Revised Draft SEIS.

**Comment Number SA-2-31-W-6****Comment**

The last sentence discloses the intent of protecting sage-grouse leks and nesting habitat. However, there is not discussion of how this would be realized, or for how long it would be realized.

**Response**

Please see Revised Draft SEIS.

**Comment Number SA-2-32-G-15****Comment**

We request the date of the initial document (December 6, 2004) be accompanied by the phrase "or most recent version" to emphasize the use of the most recent information.

**Response**

Thank you for your comment.

**Comment Number SA-2-33-AP-3****Comment**

Annual plan should include GIS layers (in acceptable for BLM) of "as built" surface disturbance indicating stage of reclamation to facilitate monitoring of surface disturbance, roads, pads etc. and reclamation.

**Response**

Please see Revised Draft SEIS.

**Comment Number SA-2-34-RC-2****Comment**

Reclamation plans should include an inventory of vegetation (life forms, species composition, cover, height, and production) and soil types within the sites(s) to be disturbed, or within a nearby reference area that is ecologically similar.

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-35-G-16****Comment**

In the event of unforeseen problem requiring operation to return to a Development area it would be preferable for disturbance to occur on existing pad rather than creating new surface disturbance.

**Response**

Thank you for your comment.

**Comment Number SA-2-36-RC-3****Comment**

Operators should implement BMPs and available resources to aggressively re-establish desired vegetation to disturbed site.

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-37-RC-4****Comment**

Seed mixes should not include species that would out-compete more desirable native species. Interim reclamation seed mixes should include forbs and shrub components.

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-38-RC-5****Comment**

All topsoil from disturbed sites should be salvaged and stockpiled for later use in reclamation. Stockpiled topsoil should be seeded with annual grasses and be reapplied to a reclaimed area while the topsoil is still viable - usually within 2-5 years.

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-39-RC-6****Comment**

If fences are chosen for protection of vegetation, their design should meet both livestock and wildlife standards for enclosure fencing. Special consideration should be given to fence type near sage grouse lek or nesting areas.

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-40-RC-7****Comment**

We would prefer "locally native species" rather than "desirable" species. Seed mix should be based on interim or final reclamation option, soil type, site topography, and site potential (determined by pre-existing inventory of plant community on-site and/or adjacent reference area sites and desired reclamation goal).

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-41-RC-8****Comment**

We would prefer "locally native species" rather than "desirable" species. Seed mixes should be designed using baseline vegetation inventory of site prior to development or transects of species found on adjacent sites, soil type and site potential and reclamation goals developed in Reclamation Plan. Seed mixes should include plant species that are native to the area, ecologically adapted to the site, and provide forage and cover to wildlife.

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-42-RC-9****Comment**

Pipeline corridors should be revegetated to the same levels required on fully reclaimed well pads.

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-43-RC-10****Comment**

Pipeline corridors should be revegetated to the same levels required on fully reclaimed well pads.

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-44-RC-11****Comment**

Plan needs better defined reclamation criteria: (See Letter SA-2 for detailed reclamation criteria comment)

**Response**

Please see the reclamation plans in the Revised Draft SEIS.

**Comment Number SA-2-45-M-2****Comment**

Monitoring criteria and methods, mitigation thresholds, mitigation responses, and mitigation process. This should be included in Attachment 4 - Wildlife and Habitat Mitigation Plan in Appendix C. (See Letter SA-2 for complete comment)

**Response**

See the Revised Draft SEIS, specifically Alternative D.

**Comment Number SA-3-1-AQ-1****Comment**

DEQ believes that if the following mitigation measures were addressed, the PAPA project could be undertaken without creating unacceptable air quality impacts.

**Response**

The language was revised for the Revised Draft SEIS to incorporate additional mitigation measures.

**Comment number SA-4-1-SW-1****Comment**

WYPDES Storm water Permitting requirements need to be referenced throughout the document. Wherever the management of surface disturbing activities is discussed, this regulatory requirement needs to be mentioned along with BMPs.

**Response**

The text has been revised.

**Comment number SA-4-2-SW-2****Comment**

The Department of Environmental Quality would like to see the NEPA analysis and resulting EIS address any potential effects to surface water quality that may occur as a result of existing or proposed construction practices in riparian areas.

**Response**

The text has been revised.

**Comment number SA-4-2-SW-3****Comment**

Also, every effort to prevent erosion of any kind should be taken.

**Response**

Thank you for your comment. The BLM BMPs and construction and rangeland standards are designed to address this issue.

**Comment number SA-4-3-GW-1****Comment**

Until a better understanding of the entire aquifer system hydrogeology is achieved, we do not think it is possible to say that the aquifer is being properly monitored. Further studies need to be performed to determine if the Alluvial, Wasatch and Valley Fill aquifers are connected, and to what degree. The zones and rates of recharge of the aquifers need to be determined. Surface water and groundwater interactions need to be better understood to monitor impacts properly. The BLM and the WDEQ have both discussed the need for this type of study in several of the Pinedale Anticline Work Group (PAWG) Water Task Group meetings. The need for this study has been passed on to the main PAWG, without any success. The Rock Springs BLM office has gone as far as creating a draft plan to address this need.

**Response**

BLM agrees. The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment number SA-4-4-GW-2****Comment**

The WDEQ believes that the BLM and the operators need to develop a plan on addressing these issues and work to obtain a better understanding of the aquifers in both the PAPA and the Jonah oil and gas fields.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction. The Jonah Field is outside the purview of this document; however, BLM understands the potential for connection.

**Comment number SA-4-5-GW-3****Comment**

The recent discovery of the presence of hydrocarbon in operator's water supply wells is a great concern to the WDEQ.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment number SA-4-5-GW-4****Comment**

This appears to be a widespread problem that needs to be addressed quickly and thoroughly.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment number SA-4-6-GW-5****Comment**

All water supply wells need to have back flow prevention requirements. This requirement should be confirmed by BLM inspectors. The wells need to be constructed and operated following the Wyoming State Engineers Office (SEO) Water Well Minimum Construction Standards, and any other applicable requirements and/or practices.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment number SA-4-7-GW-6****Comment**

If a release or spill threatens to impact, or is found to have impacted a surface water or groundwater, the WDEQ needs to be notified immediately. A written report should follow within 7 days of the incident. Prevention of impacts includes the use of secondary containment at any possible points of releases such as discharge valves and vapor venting where liquids might be released. Proper good housekeeping is also required.

**Response**

Thank you for your comment. All operations are required to comply with local, state, and federal regulations. A NEPA document is used to disclose impacts and identify points of mitigation.

**Comment number SA-4-8-GW-7****Comment**

All new water supply wells should be constructed using sanitary water well construction methods. This means using non-toxic lubricants for casing threads, properly cleaning the casing before installing it, using safe perforation methods when completing the wells, and other applicable practices.

**Response**

Water well construction falls under the jurisdiction of the Wyoming State Engineers Office; however, the BLM is attempting to address your comments through a cooperative process to more precisely define impacts. This will allow BLM to determine the proper application of mitigation, monitoring and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment number SA-4-9-GW-8****Comment**

We ask that any new water supply wells test the water quality of the various water bearing zones to ensure different classes of water are not being mixed.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment number SA-4-9-GW-9****Comment**

We ask that any new water supply wells test the water quality of the various water bearing zones to ensure different classes of water are not being mixed.

**Response**

Thank you for your comment. BLM is not sure what the objective of your comment is, but all operations are required to comply with WDEQ water quality standards.

**Comment Number SA-4-11-GW-10****Comment**

We believe that electric logs should be run to surface where applicable to help map the near surface geology.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMP's. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number SA-4-12-GW-11****Comment**

We ask that the BLM require operators to install water supply wells into deeper water bearing zones, possibly into the Fort Union formation, instead of using Class I water for drilling and completion purposes.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMP's. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number**            **SA-4-13-SE-1**

**Comment**

We wanted to point out that Fremont County is also seeing effects from the activity in Sublette County.

**Response**

The Revised Draft SEIS does not address effects in Fremont County.

**Comment Number**            **SA-4-14-GW-12**

**Comment**

The SEIS states that "Water is not used from the underlying Fort Union aquifer because it is too deep and of low quality." The following paragraph on Page 3-72 states "Fort Union groundwater is not generally used and is not well characterized." What data was used to make this determination? What quality of water is required for drilling and completion activities? The WDEQ believes that water from the Fort Union formation should be used if possible, instead of using Class I water from the Wasatch formation.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMP's. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number**            **SA-4-15-GW-13**

**Comment**

It is not clear how the Wasatch is recharged in the Wind River Range if it does not out crop there. Does the 30 inches of precipitation infiltrate through other formations down into the Wasatch?

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and

BMP's. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number SA-4-15-GW-14**

**Comment**

What types of formations does this water have to migrate through? This section was not clear.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMP's. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number SA-4-15-GW-15**

**Comment**

We believe that further study should be done to identify recharge to the Wasatch formation.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMP's. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number SA-4-16-GW-16**

**Comment**

The SEIS should be consistent in its language describing the potential use of Fort Union water for drilling purposes.

**Response**

The text has been revised.

**Comment Number SA-4-16-GW-17**

**Comment**

More data should be collected or more research performed to correctly characterize the Fort Union water.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMP's. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number**                    **SA-4-17-GW-18**

**Comment**

We are concerned that groundwater quality may be different in the shallow zones versus the deeper zones.

**Response**

This is to be expected in any hydrologic system and is a natural occurrence. BLM is unsure what the objective of your comment is.

**Comment Number**                    **SA-4-18-GW-19**

**Comment**

We do not think there is a sufficient understanding of the aquifers to allow a monitoring plan to be completed.

**Response**

The current monitoring plan has achieved the desired results; however, BLM is attempting through a cooperative process, to more precisely define impacts, jurisdiction, and determine the proper application of mitigation, monitoring and BMP's. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number**                    **SA-4-19-GW-20**

**Comment**

The second bullet at the top of page 4-83 discusses changing drilling and completion techniques to correct the alkalinity problem. What problem is this? How would the techniques be changed?

**Response**

This discussion regarding the alkalinity problem was identified in the PAPA DEIS; however, later studies indicated that it may be naturally occurring. See Revised Draft SEIS.

**Comment Number SA-4-19-GW-21****Comment**

Language such as "and to prevent contamination during the operation of the water wells" should be added to this bullet.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number SA-4-20-GW-22****Comment**

In cases where this happens, the WDEQ believes that the shallow groundwater should be investigated to see if there are any impacts from the reserve pit leakage.

**Response**

The State of Wyoming and the BLM are working on developing an aquifer analysis.

**Comment Number SA-4-21-GW-23****Comment**

Please add language in this bullet that requires operators to immediately contact the WDEQ if they discover groundwater or surface water quality impacts.

**Response**

This discussion regarding groundwater quality is from the PAPA DEIS and cannot be changed.

**Comment Number SA-4-22-GW-24****Comment**

Please add language into this bullet that if this happens, the operators need to report it to the WDEQ immediately and that groundwater remediation will be required by the WDEQ.

**Response**

This discussion regarding groundwater quality is from the PAPA DEIS and cannot be changed.

**Comment Number SA-4-23-GW-25****Comment**

Groundwater violations have been identified in the PAPA and will require remediation under the VRP. Language should be added to the SEIS that explains the contamination discovered and what steps are being required to prevent any further impacts.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number SA-4-24-GW-26****Comment**

The fourth bullet on page 4-84 mentions cross contamination of aquifers. Please note that cross contamination could occur within the same aquifer, such as the Wasatch.

**Response**

This discussion regarding groundwater quality is from the PAPA DEIS and cannot be changed.

**Comment Number SA-4-25-GW-27****Comment**

Until further studies can be done, we question the use of phrases such as "...but these impacts should not affect stock and domestic wells if effective well seals are maintained."

**Response**

To date, BLM has shown no impacts from cross contamination to stock and domestic water wells.

**Comment Number SA-4-26-GW-28****Comment**

We believe that the mitigations we mentioned in our General comment #2 above should be included in this section.

**Response**

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring, and BMPs. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

**Comment Number**            **SA-4-27-SE-2**

**Comment**

The assumption about housing (4.10.1) being a constraint is not utilized to delimit the estimates for employment, earnings, and taxes.

**Response**

The Revised Draft SEIS addresses anticipated impacts to housing. Even though the housing market will be tight, it is assumed that the market will respond to the excess demand for housing and housing will not limit the development of oil and gas in the Anticline.

**Comment Number**            **SA-4-28-SE-3**

**Comment**

Section 4.10 Socioeconomics give a good snapshot of current conditions but does not show how the base line conditions will change in the immediate future (e.g. crime, traffic safety).

**Response**

The Revised Draft SEIS provides estimates of population increases under each alternative by year.

**Comment Number**            **SA-4-29-SE-4**

**Comment**

Section 4.10 describes the socioeconomics for the alternatives by face validity (that is, rhetoric), rather than on estimated calculations.

**Response**

Thank you for your comment.

**Comment Number**            **SA-4-30-SE-5****Comment**

It would be helpful to conclude section 4.10 Socioeconomics with a table comparing the impacts under each of the alternatives.

**Response**

The Revised Draft SEIS provides a range of estimated population increases under each alternative by year. Because of data limitations it discusses, but does not quantify, anticipated impacts on public infrastructure and services.

**Comment Number**            **SA-5-1-CU-1****Comment**

In addition to these individual impacts, the Pinedale Field Office (PFO) and the gas operators, which include Ultra Resources, Inc., Shell Exploration and Production Company, Questar Market Resources including Wexpro Company, BP America Production Company, Stone Energy Corporation, and Yates Petroleum Corporation, should evaluate the cumulative effects of this and other natural gas projects in the area for their impacts on rangelands, noxious weeds, and livestock grazing.

**Response**

Cumulative impacts have been properly analyzed in the SEIS.

**Comment Number**            **SA-5-2-RC-1****Comment**

To date, there is no guarantee that any disturbed acreage within the PAPA has or will be reclaimed to a level which supports livestock grazing.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the predisturbed plant community. The reclamation would then support grazing much like the predisturbed location.

**Comment Number**            **SA-5-2-RC-2****Comment**

Significant attention has not been paid to achieving satisfactory range condition on any PAPA reclamation.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the pre-disturbed plant community. The reclamation would then support grazing much like the pre-disturbed location. Although range condition is an entirely different matter than reclamation, local range conservationists as well as biologists are consulted when developing the criteria for reclamation.

**Comment Number**                      **SA-5-2-RC-3**

**Comment**

All past reclamation efforts on pipelines, pads, and well field developments is grotesquely inadequate. Why should we assume that successful reclamation will occur following the disturbance associated with additional drilling in the PAPA?

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the pre-disturbed plant community. These plans will be submitted to the BLM annually for BLM review and concurrence.

**Comment Number**                      **SA-5-2-RC-4**

**Comment**

This lack of reclamation effort will continue to reduce the available forage for livestock, thus continuing to negatively impact the livestock permittee.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the pre-disturbed plant community. The reclamation would then support grazing much like the pre-disturbed location. Local range conservationists are consulted when developing the criteria for reclamation.

**Comment Number**                      **SA-5-3-RC-5**

**Comment**

The analysis within the PAPA SEIS was generalized for the sake of minimizing the impact.

**Response**

BLM respectfully disagrees. The impact analysis was accurately presented.

**Comment Number** SA-5-4-GR-1

**Comment**

Any AUM decrease per allotment on the PAPA will negatively impact the livestock permittee. Therefore, the loss of one AUM triggers an impact and crosses a threshold for negatively impacting the livestock permittee.

**Response**

The BLM agrees and such impacts are disclosed in the SEIS.

**Comment Number** SA-5-5-GR-2

**Comment**

Additionally, existing habitat in the flanks surrounding the core drilling area on the PAPA will be enhanced initially within this project. The SEIS gives no indication as to the short-term impact that this loss of forage will have upon the livestock permittee.

**Response**

Impacts to grazing permittees are disclosed in the Draft SEIS. There is no specific proposal in the SEIS to enhance existing habitat in the flanks surrounding the core drilling area.

**Comment Number** SA-5-6-RC-6

**Comment**

Based on past reclamation efforts for gas development within the Upper Green River Basin, the WDA strongly believes that without the assistance of the State of Wyoming, the Operators will not effectively or accurately monitor the reclaimed areas to ensure successful reclamation with the PAPA.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the predisturbed plant community. These plans will be submitted to the BLM annually for BLM review and concurrence.

**Comment Number SA-5-7-MO-1****Comment**

For this reason, the WDA supports the development of an Interagency Office devoted to monitoring on the PAPA.

**Response**

Thank you for your comment, BLM will consider this in issuing a decision.

**Comment Number SA-5-8-GR-3****Comment**

How is the BLM and/or Operators prepared to address the concerns of all 50 livestock permittees?

**Response**

Concerns were disclosed and analyzed in the SEIS; further mitigation opportunities, as developed through analysis and permittee comments, will be considered.

**Comment Number SA-5-9-MO-2****Comment**

We suggest the Operators develop an Interagency Office based on the JIO model as an addition to the monitoring responsibilities listed within the SEIS.

**Response**

Thank you for your comment, BLM will consider this in issuing a decision.

**Comment Number SA-5-10-GR-4****Comment**

The WDA supports compensatory mitigation discussions, as outlined in BLM IM No. 2005-069, between the operators and livestock permittees to lessen the burden, livestock stress and economic impact to a grazing permittee from this development.

**Response**

Thank you for your comment and support.

**Comment Number**            **SA-5-11-GR-5****Comment**

For producers who desire to maintain their current herd size, an open federal allotment or private pasture may be found and utilized for the actual livestock that are displaced. The producer may also elect to absorb the displaced livestock into a surrounding or adjacent allotment. Where available, a pasture may be rented for the livestock producer.

**Response**

Options for mitigation will be considered through the planning process in conjunction with the Annual Planning Meeting.

**Comment Number**            **SA-5-12-GR-6****Comment**

Livestock producers may chose to graze their livestock at home on their hay meadows, and have hay purchased for them for use in lieu of grazing the affected allotment. This activity could serve as a temporary fix until other alternatives are found, or it may serve as a long-term mitigation strategy.

**Response**

Although the BLM supports such coordination, this is outside of the purview of the SEIS. Any such mitigation would need to be offered by the Operators.

**Comment Number**            **SA-5-13-GR-7****Comment**

Livestock producers may chose mitigation based on direct impacts, which are documented from on-the-ground monitoring. Rangeland monitoring can be used to make both short- and long-term management decisions. Monitoring can include utilization, plant community composition, cover, function, structure and species presence. Compensation can be based on a predetermined value which is placed on the recorded impact. Based on monitoring analysis, range improvements will be constructed. The WDA recommends the use of the Wyoming Rangeland Monitoring Guide (August, 2001).

**Response**

Thank you for your comment.

**Comment Number SA-5-14-GR-8****Comment**

By developing water, livestock are able to move throughout the allotment and utilize the forage, without concentrating in one particular area. Water developments in either the affected allotment or surrounding allotments will improve the carrying capacity for livestock. Water could also be developed on the producer's private land to increase AUMs or hay crop yield.

**Response**

The BLM encourages such range projects within the SEIS area including developing water facilities to further manage livestock use.

**Comment Number SA-5-15-GR-9****Comment**

Gas operators will purchase private land in the area, turn the control over to the local grazing or cattlemen's association, in which they will utilize the land for grazing as displacement occurs in the oil and gas area. This effort will act as a grass bank until AUMs are returned on federal land.

**Response**

This is outside of the purview of the SEIS. Any such mitigation would need to be offered by the O&G operators.

**Comment Number SA-5-16-GR-10****Comment**

To temporarily offset the displacement of livestock due to oil and gas development, negotiate a settlement to reimburse the producer for lost AUMs until grazing resumes. This payment may be for a portion or for all AUMs located within the affected allotment. The reimbursement may continue for the life of the displacement of livestock, and cease following reclamation, upon which time livestock grazing will resume.

**Response**

This is outside of the purview of the SEIS. The suggested mitigation would need to be offered by the Operators.

**Comment Number SA-5-17-GR-11****Comment**

Additionally, future projects like range improvements and water developments that will enhance the natural resource base of the grazing allotments on the PAPA should be addressed in an attentive manner by the BLM.

**Response**

It is the intention of the BLM to attentively address any such future projects through the range program, Oil & Gas program, and/or the Annual Planning Meeting.

**Comment Number SA-5-18-GR-12****Comment**

We ask the Operators to apply all mitigation opportunities to all affected permittees due to offsite mitigation resulting from impacts on the PAPA.

**Response**

This is outside of the purview of the SEIS. Any such off-site mitigation would need to be offered by the Operators.

**Comment Number SA-5-18-GR-13****Comment**

We ask that the proponents work with the livestock permittees to lessen any burden because of disruption in their operations due to gas development activities.

**Response**

Although the BLM supports such coordination, this is outside of the purview of the SEIS. Any such mitigation would need to be offered by the Operators.

**Comment Number SA-5-19-RC-7****Comment**

It is true that the herbaceous component of reclamation is higher than the woody component, but the woody component is expected and in an area with such an emphasis on wildlife habitat, there is a strong request that some sort of woody vegetation be a requirement in reclamation.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the pre-disturbed plant community. Local biologists are consulted when developing the criteria for reclamation.

**Comment Number**                    **SA-5-20-RC-8**

**Comment**

Therefore, we suggest that 75% cover should be to native vegetation and not to total cover.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the pre-disturbed plant community.

**Comment Number**                    **SA-5-21-RC-9**

**Comment**

There is also a big difference between basal cover and canopy cover. We recommend identifying which kind of cover this requirement refers to.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the pre-disturbed plant community.

**Comment Number**                    **SA-5-22-RC-10**

**Comment**

Again, we suggest defining what kind of cover this statement refers to and if it is compared to native or % total cover.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the pre-disturbed plant community.

**Comment Number SA-5-23-RC-11****Comment**

One possible solution is a plant count, like frequency or density, which would require a certain number of plants per sq. meter and is compared to a native reference site. The percent cover estimate will differ, but these methods would indicate the number of plants that germinated in the spring and are on a successful trajectory. Additionally, if you were to seed in year 2006, you need to wait at least until the summer of 2007 to monitor success. The spring will only show weeds and infant plants, many of which will not be recognizable.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the predisturbed plant community.

**Comment Number SA-5-24-RC-12****Comment**

We also suggest that "native perennial" be added between "desirable" and "vegetation."

**Response**

See Revised Draft SEIS reclamation plans.

**Comment Number SA-5-25-RC-13****Comment**

Suggest adding requirements that pipeline corridors meet the same reclamation standards as well pads.

**Response**

Pipelines will be included just as well pads when it comes to reclamation planning and monitoring. There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the predisturbed plant community.

**Comment Number SA-5-26-RC-14****Comment**

We recommend changing this statement to "once a well pad has been fully developed, full site restoration and reclamation would begin the next appropriate seeding period. Fall seeding should September 15 to freeze-up and Spring seeding should occur post-thaw to May 15."

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the predisturbed plant community. These plans will be submitted to the BLM annually for BLM review and concurrence. BLM gives guidance on seeding windows. There are not hard and fast regulations but only guidance as new technologies etc. may make other seeding windows appropriate. Finally BLM has final objectives which are results oriented and how they are obtained is often left up to the permittee.

**Comment Number SA-5-27-RC-15****Comment**

We recommend changing the site to be "within 10 feet of original and have a natural looking contour."

**Response**

In your scenario what if the site were adequately reclaimed and was +/- 10.1 feet then we would technically have to require the site be redisturbed again losing out on satisfactory final reclamation. It is in everyone's best interest to leave the wording and allow the BLM authorized officer to make the call on final reclamation.

**Comment Number SA-5-28-RC-16****Comment**

We do not see any "levels" for fully reclaimed well pads. We recommend referring to the EIS if that is what is indicated, otherwise, identify what the levels are. There are levels for interim and not full reclamation.

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the predisturbed plant community. These plans will be submitted to the BLM annually for BLM review and concurrence.

**Comment Number SA-5-29-RC-17****Comment**

If the reclamation criterion only uses ground cover as the criteria, using photo point monitoring, as suggested by BLM State Range Specialist Jim Cagney, is the best method for this purpose. All the other methods are a waste of effort, money, and personnel if the standards for reclamation are not identified (although very useful in identifying reclamation success).

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the predisturbed plant community. These plans will be submitted to the BLM annually for BLM review and concurrence. The BLM offers guidelines and leaves it up to the operators on how they accomplish the objectives.

**Comment Number SA-5-30-RC-18****Comment**

We recommend one of two changes: 3.9.1 Identify reclamation standards and have monitoring techniques specific to those standards. The Attached JIO Reclamation Standards are an excellent example; or, 3.9.2 Delete "Monitoring Methods" and "Data Collection Methods" and add:..

**Response**

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the predisturbed plant community. These plans will be submitted to the BLM annually for BLM review and concurrence. The BLM offers guidelines and leaves it up to the operators on how they accomplish the objectives.

**Comment Number SA-6-1-G-1****Comment**

I support the proposed actions under Alternative "B" because it will allow for the continued development of the natural gas resources that we are so much in need of and depend on. The proposed plan for limited year-round drilling provides for our local communities and the state.

**Response**

Thank you for your comment.

**Comment Number SA-7-1-G-1****Comment**

I truly believe the new proposal is superior for wildlife, the environment, and the local and state economy.

**Response**

Thank you for your comment.

**Comment Number SA-8-1-G-1****Comment**

As a citizen of Wyoming and state representative, I believe that the government should be responsible and rule in favor of opportunities that are most beneficial to its entire people. Approval of Alternative B, presented in the PAPA SEIS, will assist an entire nation, create economic opportunity for the state of Wyoming and protect the outdoor interest and values most treasured by the people of the Town of Pinedale.

**Response**

Thank you for your comment.

**Comment Number SA-9-1-G-1****Comment**

I ask for your consideration and again express my support of the SEIS.

**Response**

Thank you for your comment.

**Comment Number SA-10-1-G-1****Comment**

I encourage those empowered by the people they serve to make this decision, to make the right decision and approve plan B.

**Response**

Thank you for your comment.

**Comment Number** SA-11-1-G-1

**Comment**

I appreciate this opportunity to respond and feel it is vital to all Americans that the SEIS be approved.

**Response**

Thank you for your comment.

**Comment Number** SA-12-1-G-1

**Comment**

As an elected official of the State of Utah I am voicing my strong support of Alternative B and encourage approval of the new development on the Pinedale Anticline. My constituents will benefit from this plan which will increase our lower-cost gas supply. Under the plan, Pinedale operators will protect regional air quality by reducing rig emissions and reduce the temporary impact of development on the community. As an elected representative of Utah I am pleased with the way Questar operates at Pinedale and encourage your approval of Alternative B.

**Response**

Thank you for your comment.

**Comment Number** SA-13-1-AQ-1

**Comment**

As a side note, I do request that the development on or near the Wyoming Range be monitored carefully and that, in concert with the Forest Service, to ensure the National Forest areas are protected.

**Response**

Thank you for your comment.

**Comment Number** SA-14-1-G-1

**Comment**

I would ask that you recognize the impact of the disturbance and the loss of a finite resource when making your decisions. To the extent that this plan meets those goals and is a sincere attempt at compromise I ask that it be favorably considered.

**Response**

Thank you for your comment.

**Comment Number**            **SA-15-1-G-1**

**Comment**

As the Speaker of the Utah House of Representatives, I write to inform you that I fully support the proposal put forward by Questar, Shell, and Ultra for limited year-round development in "concentrated development areas" on the Pinedale Anticline.

**Response**

Thank you for your comment.