

## **APPENDIX 2**

### **Scoping Comments**

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### Air Quality

- provide a detailed air quality analysis.
- include modeling scenarios with mitigation measures that will result in no impacts to visibility in nearby Class I and Class II wilderness areas.
- include water and condensate gathering as mitigation for air analysis.
- address stabilization of rig numbers.
- disclose potential impacts to Class I and II areas from drilling, completion, and flaring in cold winter conditions.
- provide for project and cumulative – a comparison of emissions from original PAPA and the proposed action; discuss and evaluate mitigation measures to reduce emissions.
- provide a complete cumulative analysis of southwest Wyoming.
- reduce air emissions.
- use Tier 2 technology.
- address regional haze issues and potential mitigation for visibility impairment in Class I areas.
- should include project specific and cumulative effects air quality analysis.
- include effectiveness of ASU emissions mitigation.
- include latest monitoring results for ozone in Pinedale area and statement of compliance with NAAQS.
- include modeled ozone concentrations resulting from development in the PAPA.
- conduct extensive air modeling.
- evaluate effectiveness of Naughton Power Plant Unit 3 retrofit on air quality in area.
- companies should be striving to use best available technology to reduce emissions right now regardless of winter access.
- concerns about impacts to high mountain lakes resulting in impacts to trout and downstream water users.
- identify and analyze cumulative impacts including visibility in Class I areas.

- consider impact of project on ozone concentrations and compare to NAAQS.
- address balance between directional drilling and increased air quality impacts.
- low emission drill rigs should be used and should comply with WDEQ regulations on flaring.
- requests that strictest possible standards for emissions be applied.
- public health issue of air quality.
- concerned about dust and truck emissions.
- winter inversions can trap air pollutants.
- operators should use natural gas or clean diesel engines on all rigs.
- road construction and dust should be minimized.
- monitoring should be increased.
- monitoring should be used and pollutions should be decreased.
- air pollution, air pollution mitigation, air pollution modeling and air quality monitoring should all be addressed. Include necessary compression and gas processing plants (Granger).
- evaluate air quality impacts and detail mitigation steps to minimize impacts, identify types of fuels to be used during construction, increased traffic, and related VOC and NO<sub>x</sub> emissions.

**Alternatives**

- should include at least one conservation alternative.

**Cultural**

- the integrity of trail and trail viewshed should be preserved.
- confirm compliance with the national Historic Preservation Act Section 106 consultation with the Wyoming SHPO Officer.

**Environmental Justice**

- disclose and evaluate these aspects. Coordinate with potentially impacted Native American tribes.

**General**

- BLM should require adaptive management strategies.
- companies should be bound to commitments and responsibilities as well as successor companies.

- there should be full coordination for all activities between the operators.
- supports year-round drilling to shorten development time.
- no arbitrary restrictions on development activities.
- any restrictions should provide for waivers, modifications, or exceptions.
- request a map of all private and public lands and current leases in the document.
- concern about pace of development outside of PAPA ROD.
- document should be thorough in investigating technical and managerial “best practices”.
- include findings of pilot and demonstration projects; address directional drilling reach of 3,000 feet; establish peer review procedures.
- interagency collaboration should occur.
- identify adaptive approach to impacts from any waivers of wildlife stipulations and define measures for reinstating them.
- BLM must address unnecessary or undue degradation of the lands; maintain adaptive environmental management.
- BLM should implement PAWG’s recommendations.
- BLM must independently verify accuracy of information submitted by proponents.
- acknowledge precedents that this approval will set.
- cautions that directional drilling is not applicable everywhere.
- limit scope of analysis to potential impact on wildlife species from year-round drilling.
- objects to analysis of anything except for impacts to wildlife as a result of year-round drilling.
- why does BLM have to consider proposal; should consider Questar’s test winter drilling before this proposal is approved.
- operators should incorporate some proposals into summer drilling; technological improvements should be made in any case – not only to benefit wildlife.
- concern that RMP is not yet available; why is human access limited but not gas company access.

- public should have access to maps in review process.
- benefits of proposal should be implemented without lifting winter restrictions.
- monitoring should involve real action to prevent negative impacts.
- technological mitigation measures should be in place for all drilling on the Mesa including summer months.
- concern over meeting existing regulatory environmental compliance standards with regard to air quality and water quality.
- concern over implementation of adaptive management.
- discuss technological advances in document (especially drilling and casing techniques to eliminate blowouts).
- discuss potential for “connected actions” within the entire Green River Basin.
- discuss monitoring and enforcement within the anticline.
- concerned about setting precedents in the Green River Basin (take time to get it right).
- opposes the project.
- slow pace of development until realistic evaluation can be done on effects to wildlife, residential water wells, the river, etc.
- opposes removal of winter drilling restrictions.
- pace of development is too fast – concern over aquifer/groundwater contamination.
- surface disturbance should be reduced regardless of waivers of winter stipulations.
- pace of development is too fast.
- monitoring data should be analyzed and changes made accordingly.
- slow pace of development; require mitigation in only summer months.
- opposes winter drilling.
- operators should implement directional drilling and gathering systems regardless of winter drilling approval.
- hold operators to one well per section and pipe condensate and water.

- address all changes in development made in recent NEPA documents to determine adequacy of existing monitoring and research.
- evaluate how monitoring and research will be used to modify development once impact is demonstrated.
- support of the project – should place no arbitrary restrictions on development – any restrictions should provide for waivers, modifications or exceptions.
- supports the proposal, pipeline should follow existing corridors, NEPA process should be streamlined with analysis of real not perceived issues, reasonable alternatives should be analyzed, mitigation and lease stipulations should use sound science.
- address road construction and dust control, identify crossing methods for streams.
- Vegetation, Wildlife Habitats, and Area Hunting and Fishing – address the effects of the pipeline project activities on area ecology.
- pipeline through crucial winter range should not be constructed in the winter.

**Geology**

- address “shifting geology” and need to drill year-round.
- companies should be required to get more gas out of their existing wells before drilling additional wells.

**Land Use**

- address impacts to ranchers and landowners as a result of wildlife being displaced to their lands.
- BLM should consider property rights.
- increased presence of displaced animals on ranchers.
- multiple use objectives are being overlooked.
- concerned about gas companies industrializing private lands to avoid restrictions on BLM land.
- address required permits for pipeline crossings or approaches to the highway.
- address additional policies regarding split estate lands.
- include an analysis of potential effects of the proposed action and alternatives to reclamation lands and facilities.

**Noise**

- use mitigation in crucial winter range.
- discuss short-term and long-term noise pollution and detail mitigation measures.

**Public Health**

- address hand washing and waste elimination for large number of people – other than portable-potties.

**Range and Grazing**

- mule deer will be pushed to private land.
- should be offsite mitigation to landowners.
- need plan for handling livestock permits.
- concerned about AUM decrease as a result of offsite mitigation.
- supports alternative which would reduce surface disturbance.
- need more coordination between operators and livestock producers who graze the Mesa.
- concerned that offsite mitigation will pressure cattle use on the rest of the Mesa.

**Reclamation**

- encourage BLM to insure reclamation areas are successfully restored and provide wildlife benefits.
- need timely reclamation.
- encourage BLM to insure reclamation areas are successfully restored and provide wildlife benefits.
- surface should be revegetated in manner that prevents the invasion of noxious weeds, use surface fill that supports native ground cover, prevent erosion, and riling of soil down slopes.

**Recreation**

- address impacts to hunting and fishing communities as a result of lifting winter restrictions.
- populations have declined making hunting more difficult.
- public should have use of the Mesa if gas companies do.
- concerned about populations declining for hunting.

- construction should not interfere with water recreations.

**Socioeconomic**

- increase coordination with public.
- support for the project – will provide stability for working citizens in Sublette County.
- address impacts to local and adjacent communities as a result of lifting winter restrictions.
- effects to citizens of Pinedale should be considered.
- in support of proposal to establish stable economy.
- BLM should consider impacts to the human environment (winter restrictions allow Pinedale to return to pre-gas industry ways for the winter).
- concern over man camps, too much development and potential for “bust”.
- concern over “bust’ when drilling ceases.
- concerned about seasonal employment and safety associated with winter restrictions.
- look at impacts to local communities.
- supports winter drilling to stabilize economy.

**Transportation**

- reduce impacts by busing, stockpiling, or convoys.
- truck traffic is dangerous on E. Green River Rd – CR 110 – only intended for ranch activity.
- concerned that winter drilling will create a safety hazard on County Road 23-110.
- concerned about safety of County Road 23-100 and increased risk during winter.

**Vegetation**

- minimize disturbance; multiple wells from one pad should be standard procedure.

**Visual**

- evaluate impacts and detail mitigation steps that will be taken to minimize associated impacts. Address light pollution.

**Water Resources**

- address heavy metal concentrations (mercury and selenium) in production waters.

- concern about aquifer contamination from drilling and fracing.
- discuss methods to prevent, monitor and mitigate impacts to groundwater.
- concern over groundwater/aquifer contamination.
- potential for impacts to downstream water users.
- must evaluate subsurface water zones by additional investigational drilling.
- SEIS should contain level of information and analysis to support and comply with the 404 Guidelines.
- address any TMDL plans, produced water disposal, pretreatment of stormwater and mitigation plans. Address hydrostatic testing of the pipeline and the requirements for NPDES Clean Water Act Section 402 storm water permits.
- address potential for impact to drinking water aquifers and protection from cathodic protection structures.

### **Wetland and Riparian Areas**

- identify all wetlands and waters of the U.S. that would be crossed or impacted including farmed wetlands and prior converted wetlands. Address need for buffer areas and commitments to reestablish wetlands and the need for compensatory mitigation.

### **Wildlife**

- concerned with the request to remove all wildlife stipulations.
- ensure that large unfragmented areas are left undisturbed; expand wildlife studies.
- complement initial mule deer study.
- oppose waiving wildlife habitat protection stipulations on the leases in the PAPA; do not support winter well completions.
- recommends that BLM consider short-term impacts (5 to 20 years) to wildlife and their habitats as well as long-term impacts to wildlife (mule deer, antelope and sage grouse).
- recommend that BLM consider an alternative that protects wildlife habitat on portions of the PAPA while allowing gas development in other portions.
- discuss effectiveness of mitigation for loss of critical winter range.
- include discussion on directional drilling to preserve crucial winter range.

- BLM should look outside of administrative boundaries for better mitigation strategies; continue research on mule deer.
- look at offsite mitigation as a regional issue.
- deal with human component to wildlife effectively.
- look at larger ecosystem for species.
- monitoring should be actively in place and should be long-term commitment (20 years or the life of the gas field).
- include an analysis of effectiveness of wildlife stipulations.
- explain monitoring; clarify intention of Proponents request to remove seasonal stipulations for all species in all habitat types.
- must provide scientific support before abandonment of any seasonal stipulations or claim that they are unnecessary or ineffective or that removal of them can be compensated for.
- address any deviations from the “Minimum Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats on BLM Lands.”
- concern for removal of seasonal stipulations.
- concern that management objectives of MA 2 have not been met.
- do not remove winter restrictions.
- buying back suspended leases in the Upper Bridger Teton and Wyoming Range should be mitigation for removal of winter restrictions in the Pinedale Anticline.
- the quantitative data on the impacts of winter drilling on wildlife should be made available to the public.
- concern over winter drilling due to potential negative impacts.
- should include data on roadkills on U.S. Highway 191 between Boulder and Pinedale; winter drilling should not be approved until effects are fully understood.
- opposes consideration for expansion of year round drilling.
- opposes approval of additional winter drilling on the Mesa.
- in offsite mitigation, consider potential for conflicts with people and other wildlife.
- address chronic wasting disease in ungulates.

- winter drilling exceptions should only be made on a case-by-case basis.
- against winter drilling, concerned about CWD, increased roadkills.
- opposes year round access on the Mesa; concerned for mule deer populations disruption of sage grouse leks and antelope populations.
- concerned about declining deer population on the Mesa.
- no drilling should be allowed in the wintering areas; sage grouse should be protected.
- supports offsite mitigation; should buy back leases in the South Rim Unit and not allow drilling there.
- issues are a concern to the community.
- does not support elimination of seasonal restrictions; concerned about mule deer, sage grouse, and antelope.
- concerned about roadkill from increased winter traffic on County Road 23-100.
- provide documentation of operators' assertion that the proposed action (including completions) provides protection at least to the level of existing stipulations; provide GIS-based evaluation of habitat on and off the PAPA.
- evaluate effects of current development with current knowledge of effects to wildlife to allow better management of development and operation.
- adopt an objective of no further loss of key wildlife habitats and specify how to achieve the objective.
- evaluate trends in sage grouse on impacted and non-impacted areas, including winter habitats with a plan for sage grouse conservation in the region.
- evaluate implementation and effectiveness of applicant-committed mitigation measures.
- develop a management plan to address wildlife and continued development.
- address impact to summer range used by mule deer wintering on the PAPA.
- too late for mitigation to work on the Mesa for mule deer.
- opposes drilling on big game winter range during critical periods.