



U.S. Department of the Interior

Bureau of Land Management
Casper Field Office, Wyoming

January 2004

Casper Field Office Planning Area



Final Scoping Report



ACRONYMS AND ABBREVIATIONS

ACEC	Area of Critical Environmental Concern
ATV	all-terrain vehicle
AUM	animal unit month
BLM	Bureau of Land Management
BMP	best management practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CRMP	Cultural Resource Management Plan
DOI	U.S. Department of the Interior
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPCA	Energy Policy and Conservation Act
ESA	Endangered Species Act
FLPMA	Federal Land Policy and Management Act
GIS	Geographic Information System
HMP	Habitat Management Plan
kv	Kilovolt
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
MSA	Management Situation Analysis
NOA	Notice of Availability
NOI	Notice of Intent
NSO	no surface occupancy
NSS	Native Species Status
OHV	off-highway vehicle
ORV	off-road vehicle
PFC	Proper Functioning Condition
RFD	reasonable foreseeable development
RMP	resource management plan
ROD	Record of Decision
SMA	Special Management Area
TCP	Traditional Cultural Properties
USFWS	United States Fish and Wildlife Service
VRM	Visual Resource Management
WGFD	Wyoming Game and Fish Department
WSA	Wilderness Study Area

FINAL SCOPING REPORT

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Casper Field Office, Wyoming**

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It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

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1.0 INTRODUCTION

The Federal Land Policy and Management Act (FLPMA) requires the Bureau of Land Management (BLM) to develop Resource Management Plans (RMPs) and to update or revise the RMPs when appropriate. The existing Platte River RMP was completed in 1985. Since then, the RMP has undergone over 50 maintenance actions to either update or amend the RMP. The BLM is revising the 1985 Platte River RMP and preparing a supporting Environmental Impact Statement (EIS). The BLM's Platte River Resource Area is now referred to as the Casper Field Office Planning Area (Casper Planning Area). The RMP revision is titled and referred to as the Casper RMP revision.

The Casper Planning Area (Figure 1) includes 1.4 million acres of BLM-administered surface land and 4.7 million acres of BLM-administered mineral estate in Converse, Goshen, Natrona, and Platte counties in east-central Wyoming. Except for Natrona County, most BLM-administered surface land involves scattered tracts intermingled with state and private lands. The revised RMP will provide future direction for managing BLM-administered lands within the Casper Planning Area.

This scoping report describes the public involvement process (Section 2.0), which includes a discussion of the public notification process, descriptions of the scoping meetings, a summary of the opportunities provided for public comments, a list of cooperating agencies and federally recognized tribes. This scoping report also provides a summary of comments submitted to the BLM during the comment period (Section 3.0) and a summary of data gaps identified during the scoping process (Section 4.0). A summary of the next steps involved in the RMP revision process is provided in Section 5.0.

2.0 THE SCOPING PROCESS

Public involvement is an integral part of revising the RMP and preparing the EIS. The Council on Environmental Quality's (CEQ) Scoping Guidance defines scoping as the "process by which lead agencies solicit input from the public and interested agencies on the nature and extent of issues and impacts to be addressed and the methods by which they will be evaluated."

BLM's planning regulations 43 Code of Federal Regulations (CFR) 1601-1610 and CEQ's regulations 40 CFR 1500-1508 incorporate the National Environmental Policy Act (NEPA) requirements for public involvement and scoping. In 43 CFR 1501.7 and 1506.6, the CEQ describes what the federal agency must do as part of the scoping process to involve the public. BLM Manual Section 1790 and Handbook H-1790-1 set forth BLM policies and guidance for complying with CEQ Regulations (40 CFR 1500-1508) and the Department of the Interior's (DOI) Manual (516 DM 1-7) on implementing NEPA. BLM Handbook H-1610 gives direction for conducting public scoping meetings and Washington Office Information Bulletin 2003-020 gives guidance on what information may be included in the scoping report.

The intent of the scoping process is to provide ample opportunity for the collaborators (tribal, state, and local governments; other federal agencies; stakeholders; and the general public) to learn about and comment on the RMP revision. Scoping is not an isolated action, rather it brings together collaborators early in the process; identifies significant issues, alternatives and potential impacts to be addressed; and identifies assignments among lead and cooperating agencies. This process ensures that the RMP revision and EIS address significant issues important to the people who will be affected by BLM's decisions.

Scoping for the Casper RMP revision took place from June 20, 2003 to November 20, 2003. BLM resource management regulations only require a 30-day scoping period; however, the Casper revision scoping period remained open for five months.

In the Federal Register Notice of Intent (NOI) and during scoping preliminary planning issues and criteria were identified by BLM personnel. These planning issues and criteria will be used to guide the identification and development of management alternatives. Preliminary planning issues and criteria may be refined or new ones added as a result of the public scoping process.

While the scoping report identifies potentially significant issues, the document does not make decisions nor does it set forth policies. The scoping report only summarizes the issues received by BLM up to the end of the scoping period, November 20, 2003. Comments received during the scoping period are summarized by revision topic in Appendix A. A complete set of comments (letters) is included in Appendix B. Comments received after November 20, 2003 are not captured in the scoping report summary, but they are included in Appendix C and the BLM will work to ensure that these late comments are incorporated in the next phase of the RMP revision process to the extent possible. To that effect, the BLM is open to accepting comments any time during the RMP revision process and will work to ensure that these comments are incorporated into the next phase of the Casper RMP revision process.

2.1 *Notifications*

Federal Register Notice of Intent

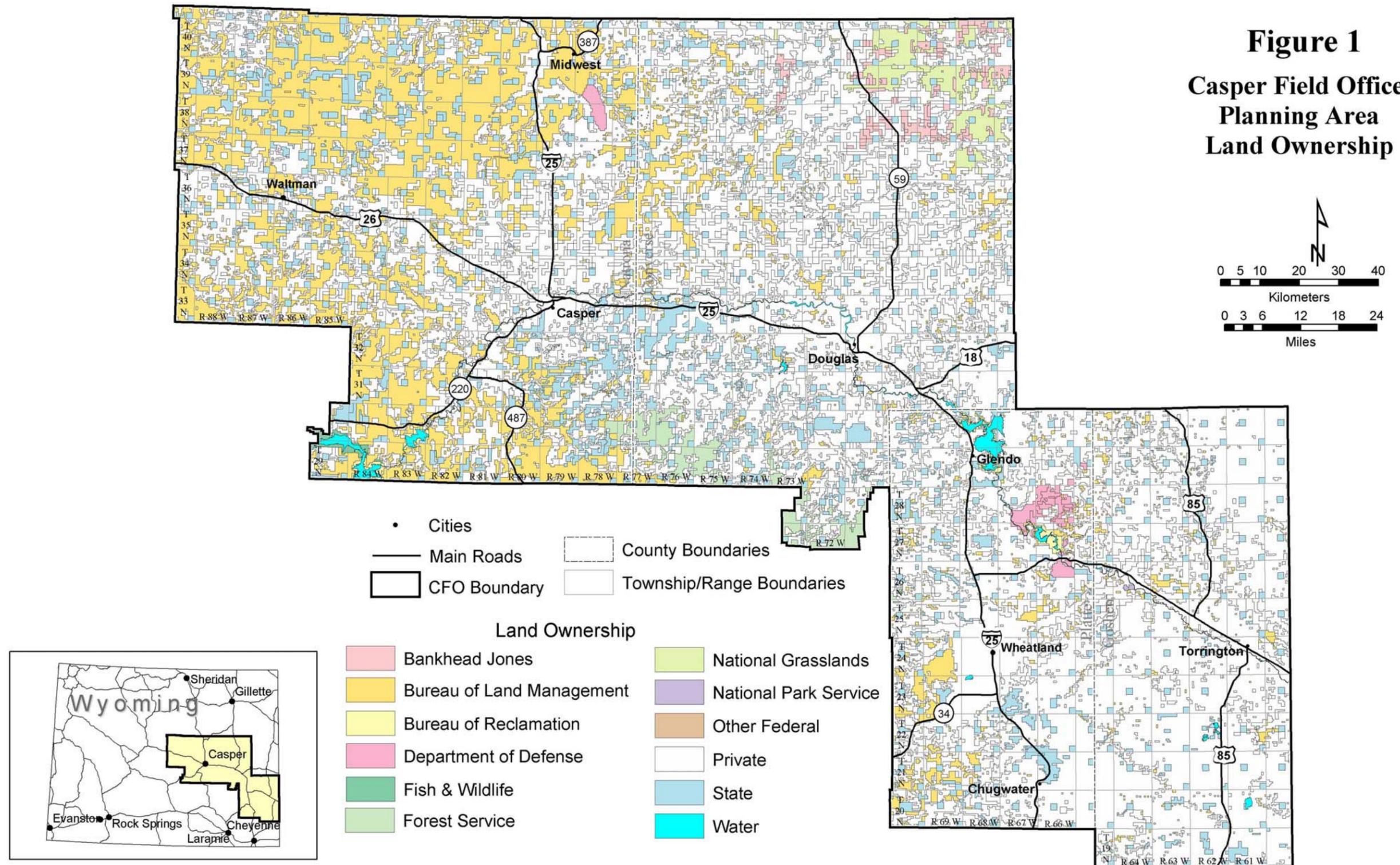
The initiation of the scoping process began with publication of the NOI to revise the Platte River RMP and prepare a supporting EIS in the Federal Register (see Appendix D). The NOI, published June 20, 2003, identifies preliminary planning issues and criteria. Although the NOI indicates that the BLM can most effectively use public comments and resource information submitted within 30 days of the publication, the scoping period for the Casper RMP revision extended beyond the 30-day period to five months.

Scoping Notice

The BLM pursued multiple avenues to notify the public of the various opportunities for involvement in and commenting on the nature and extent of issues and impacts to be addressed in the Casper RMP revision. A scoping notice (see Appendix E) was mailed to 1,104 interested and involved collaborators on October 20, 2003. In the scoping notice, the BLM solicited written comments on the RMP revision process, issues, and impacts and invited collaborators to a series of four public scoping meetings, to be held throughout the planning area. The scoping notice also served to remind the public of the opportunity to view the Summary of the Management Situation Analysis (MSA), the project schedule, and other relevant project information on the Casper RMP revision website (www.blm.gov/rmp/casper).

Additionally, Public Affairs Specialists from the BLM sent press releases to various newspapers in cities and towns across the planning area and the State of Wyoming. Appendix F provides a sample press release and a list of local and regional media used for public service announcements.

Figure 1
Casper Field Office
Planning Area
Land Ownership



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Website

The BLM developed a website to provide collaborators with another tool to find information about the RMP revision process and to provide another input method for public comments. The website, www.blm.gov/rmp/casper, provides current information on the schedule for the RMP revision, relevant and complete documents and notifications, an opportunity to join the mailing list, photographs of the planning area, and an electronic comment form for anyone who wishes to submit comments online (Appendix G). The Casper RMP revision website went online on October 16, 2003 and will be regularly updated throughout the RMP revision with general project information, published reports, meeting dates, and photographs.

2.2 Scoping Meetings

A series of public scoping meetings were held across the Casper Planning Area in facilities compliant with the Americans with Disabilities Act. Meeting times and locations are listed in Table 2-1. The four meetings employed an open house format with two formal presentations (3:30 p.m. and 6:00 p.m.) by the Casper Field Office Manager. Each presentation was followed by a question and answer session. Four fact sheets, the Summary of the MSA, and a series of four display boards were provided at each scoping meeting. Resource specialists and other representatives of the BLM were on hand to personally address questions and provide information to meeting participants. Meeting attendees were encouraged to comment using a variety of media, including written comment forms, flip charts, planning area maps, and a computer kiosk. A sign-in form was also provided to the public at these meetings (Appendix H).

Table 2-1. Scoping Meeting Times and Locations

Meeting Site	Date	Facility	Time
Wheatland	November 10, 2003	Platte County Library Large Meeting Room 904 9th St. Wheatland, WY	3 p.m. to 8 p.m.
Torrington	November 11, 2003	Eastern Wyoming College Community Training Center 3200 W. C St. Torrington, WY	3 p.m. to 8 p.m.
Douglas	November 12, 2003	Converse County Building Community Room 107 N. 5 th St. Douglas, WY	3 p.m. to 8 p.m.
Casper	November 13, 2003	BLM Casper Field Office 2987 Prospector Drive Casper, WY	3 p.m. to 8 p.m.

Displays

Four 3-panel, table-top display boards (see Appendix I) guided meeting participants visually through the RMP revision process and issues. The four display boards included the following:

-
- a description of the Casper RMP revision process, schedule, and preliminary planning issues;
 - a map of the Casper Planning Area;
 - a list of commonly used acronyms in the revision process;
 - physical and biological resources information;
 - resource uses of the planning area;
 - fire management on the planning area;
 - special land use designations; and,
 - social and economic conditions of the people living near the Casper Planning Area.

Fact Sheets

Four fact sheets were developed by the BLM to provide meeting participants with an overview of the Casper RMP revision process and can be found in Appendix J. The fact sheets provided the following:

- *The RMP Revision Process* - defined acronyms and terms commonly used in the planning process;
- *How You Can Participate* – provided a step-by-step description of how interested members of the public can be involved in the revision process;
- *Preliminary Planning Issues* – reiterated the preliminary issues and criteria documented in the Federal Register NOI that the BLM identified; and,
- *RMP Revision Topics* – listed the physical and biological resources, resource uses, and other topics that were being considered in the RMP revision process.

All fact sheets were distributed at each scoping meeting, were given to local and statewide media, and were made available at the Casper Field Office. Copies of the four fact sheets remain available at the Casper Field Office and on the website following closure of the public scoping period.

2.3 Opportunities to Comment

Collaborators were provided various opportunities to comment on the BLM's proposed resource issues and preliminary planning criteria. The following is a comprehensive list of methods made available for commenting during the scoping process:

- By mail – Interested parties were invited to submit comments by mail to the BLM Casper Field Office in both the NOI and the scoping notice;

- Online at the Casper RMP revision website – A comment form was made available online on November 3, 2003 for those wishing to submit comments electronically;
- By phone – The scoping notice and all four fact sheets included a phone number where interested parties could call and submit comments; and
- At public scoping meetings – Attendees at each of four public scoping meetings were provided the opportunity to submit written comments on a comment form (Appendix K), electronic comments at a computer kiosk, verbal comments to resource specialists who transcribed information onto flip charts, and written comments on maps of the planning area.

The BLM received comment in most of the aforementioned formats. An overview of the number of comments letters/forms received in each format during the scoping period (Table 2-2).

Table 2-2. Comments Received Through Each Format

Comment Format	Number of Comments Received
Mailed Comments	22
Website Comments	3
Telephone comments	0
Public Scoping Meetings	20
Total	45

2.4 Cooperating Agencies

The BLM initiated contact with potential cooperating agencies and invited them to become cooperating agencies in the RMP revision planning process (in accordance with CEQ Regulations, 40 CFR 1501.6). These cooperating agencies have begun to assist the BLM by providing information and support in the development of issues. Individual meetings were held with County Commissioners from Converse, Goshen, Natrona, and Platte counties. Table 2-3 identifies the local, state and federal agencies that have expressed an interest in cooperating agency status.

Table 2-3. Cooperating Agencies

Local Agencies	State and Federal Agencies
Converse County Commissioners	United States Fish and Wildlife Service (USFWS)
Converse County Conservation District	Wyoming State Planning Office
Lingle-Fort Laramie Conservation District	Wyoming State Department of Agriculture
Natrona County Commissioners	Wyoming Game & Fish Department
Natrona County Conservation District	Wyoming Office of State Lands and Investments
North Platte Valley Conservation District	Wyoming State Department of State Parks and Cultural Resources - State Historic Preservation Office
Platte County Commissioners	
South Goshen Conservation District	

2.5 Tribal Consultation

The BLM consults with all federally-recognized tribes that have historically and traditionally occupied the land in the planning area and views them as sovereign nations. Representatives from the following tribes were invited to participate in the scoping process and were consulted on issues such as traditional use areas and sacred ceremonial sites.

- Blackfeet
- Cheyenne River Sioux
- Crow
- Eastern Shoshone
- Lower Brule Sioux
- Nez Percé
- Northern Arapaho
- Northern Cheyenne
- Ute
- Oglala Lakota
- Rosebud Sioux
- Confederated Salish and Kootenai
- Shoshone-Bannock

3.0 ISSUE SUMMARIES OF PUBLIC COMMENTS

3.1 Issue Summaries by Revision Topic

The following sections represent a summary of public comments provided to the BLM during the public scoping period. These public comments were generated from the methods described in Section 2.3.

In order to capture the public's concerns regarding the RMP revision each comment letter (or other form) was reviewed for content and categorized by revision topic. Key comments were identified and summarized. Many letters had more than one comment. Therefore, the number of these comments is greater than the number of comment letters received. A revision topic (e.g., minerals, grazing, recreation) was assigned to each comment. For example, the impacts of smoke on air quality was identified as an issue. This issue was then categorized under the air quality revision topic. Some comments identified more than one topic. For example, a comment on the impacts of smoke from fire was identified as an air quality comment and also identified as a fire comment. By assigning multiple topics to comments, the BLM ensures the issue will be considered for all relevant revision topics. In addition, some comments were contradictory with one another. For example some people want to fully protect resources while other people want to use resources to their full extent. Appendix B contains a complete set of scoping letters received by the BLM during the five-month scoping period.

Table 3-1 shows the number of comments received per revision topic in alphabetical order. Following Table 3-1, summaries of scoping comments by revision topic are described. While all comments will be considered during the RMP revision process, fish and wildlife; minerals (including oil and gas leasing), and livestock grazing received the highest number of comments during the scoping period. Vegetation, lands and realty, transportation and access, cultural resources and off-highway vehicles also received a large number of comments.

Fish and wildlife comments focused on considering the effects of development (i.e., surface use, range management, roads) on wildlife and their habitat. Many commentors requested protection and mitigation measures for wildlife to offset existing and anticipated impacts as a result of management decisions.

Comments on mineral resources focused on oil and gas exploration techniques such as directional drilling. Some commentors considered directional drilling appropriate while other commentors did not. The methods in which to calculate surface disturbance also generated comments as well as the compatibility of mineral leasing and oil and gas development with other resources.

Livestock grazing comments focused on considering fence modifications to improve wildlife movement and coordinating with adjacent landowners to develop wildlife-friendly fencing; considering the economic effects of management actions on the local agricultural community; and addressing the impacts on range conditions from drought, wildlife, and horses.

Table 3-1. Comments Per Revision Topic Area

Revision Topic	Number of Comments	Revision Topic	Number of Comments
Air Quality	5	Special Designations	16
Cultural Resources	29	Special Status Species	15
Fire Management	15	Transportation and Access	26
Fish and Wildlife	62	Utility and Communication Corridors	2
Geology	0	Vegetation	35
Lands and Realty	33	Visual Resources	10
Livestock Grazing	46	Water Resources	20
Mineral Resources	57	Alternatives	*
National Historic Trails	13	Content and Methodology	*
Off-Highway Vehicles	27	Purpose and Need	0
Paleontology	0	RMP Revision Process	10
Recreation	20	Mitigation Measures	14
Renewable Energy	2	Cumulative Impacts	9
Social and Economic Conditions	11	Regulatory Compliance	9
Soil	11	Valid Existing Management	5
¹Total:			501

Note: * Comments under this heading are included in the specific revision topic

¹ The total number of comments includes duplicate comments. For example the same comment may appear in both air quality and fire.

3.1.1 Air Quality

The air quality section of the RMP revision will include a detailed emission inventory calculated for the various activities associated with existing management and proposed alternatives for the Casper RMP. Air quality issues raised included prescribed fire, coordination between BLM and the State of Wyoming, and BLM's authority for air quality. There were 5 comments related to air quality all of which appear in Appendix A. A summary of the comments follows:

- Consider the impacts of smoke from prescribed fire on public health, nuisance and visibility.
- Promote the use of prescribed fire to reduce the effects of smoke from a wildfire.
- Conduct a comparison of visibility impacts from prescribed fire to visibility impacts from wildfire.
- Ensure that work on air quality issues is coordinated between BLM and the State of Wyoming.
- Ensure BLM recognition of State primacy for air quality under the Clean Air Act.

3.1.2 Cultural Resources

The cultural resources section of the RMP revision will include historic and prehistoric artifacts, buildings, and structures; mines, trails, railroads, ditches; historic landscapes and trash dumps; and archaeological sites. Cultural resources may also include Traditional Cultural Properties (TCP), which are properties that are critical to a living community's beliefs, customs, and practices. The majority of comments on cultural resources focused on surveying and protecting cultural resources, regulatory compliance, and ensuring tribal consultation. In addition, the Cedar Ridge-Badwater Creek area was recommended for inclusion on the National Register of Historic Places (NRHP) as a TCP (for other special designation nominations, see Section 4.0). There were 29 comments related to cultural resources all of which appear in Appendix A . A summary of the comments follows:

- Ensure compliance with state and federal regulations including Section 106 and Section 110 of the National Historic Preservation Act (NHPA).
- Follow mandates in BLM's Cultural Resource Management Plan (CRMP) manual, and adequately integrate FLPMA's multiple use mandates into the RMP process.
- Engage in tribal consultation early in planning process.
- Consider existing CRMPs during alternative development.
- Identify existing cultural resource threats, issues and areas of interest.
- Adopt management actions to protect, conserve and restore cultural resources.
- Integrate President Bush's "Preserve America" stewardship mandates into the RMP.
- Adopt specific measures to protect cultural resources from artifact collectors, looters, and vandals.
- Nominate the Cedar Ridge-Badwater Creek area to the NRHP as a TCP and manage it as a Special Management Area (SMA).
- Adopt No Surface Occupancy (NSO) restrictions and additional necessary stipulations for leases, in order to avoid and minimize potential adverse effects on cultural and historic properties.
- Outline specific management actions, such as stabilization, fencing, signage, closures and interpretative development.
- Ensure protection of historic roads and trails while maintaining today's allowable uses.
- Provide an in-depth overview and situational analysis of BLM-managed cultural resources in the Casper Planning Area.

3.1.3 Fire Management

The fire management section in the RMP revision will include a discussion of naturally occurring fires and prescribed burns, as well as fire suppression techniques. There were 15 comments related to fire management all of which appear in Appendix A. The majority of these comments focused on developing a comprehensive fire management policy recognizing fire as both a natural disturbance element on the landscape level, as well as a viable management tool for area-specific habitat enhancement activities. A summary of the comments follows:

- Consider impacts from fire (e.g., public health, smoke).
- Examine multiple management tools, including prescribed fires, pre and post-treatment management, and treatment for weeds.
- Consider including impacts of fire on other resources (e.g., sage grouse, sagebrush, and aspen).

3.1.4 Fish and Wildlife

The fish and wildlife section of the RMP revision will include a discussion of fish species and fisheries habitat in streams, lakes, and ponds. It will also include vertebrate wildlife species that occur in the planning area including reptiles, amphibians, birds, and mammals. Threatened, endangered, sensitive, or other special status species will be addressed under a separate section. There were 62 comments related to fish and wildlife all of which appear in Appendix A. A summary of the comments follows:

- Develop mitigation strategies to minimize impacts from recreation and resource development on wildlife habitats and biological resources.
- Consider effects on range conditions from drought, wildlife, livestock and horses.
- Consider surface-use restrictions and available technologies to reduce impacts on wildlife habitats and to provide protection for riparian, floodplain, seep and spring communities.
- Provide protection measures for key wildlife habitats (e.g., big game crucial winter ranges, raptor and mountain plover nesting habitats, mahogany and sagebrush shrub and forest habitats) and for wildlife species of public and agency concern (e.g., sage grouse, prairie dogs, swift fox, and native warm water fishes). Continue to identify wildlife habitat improvement opportunities.
- Consider special management area designations to protect key wildlife habitats and continue to develop Habitat Management Plans for important areas.
- Continue to encourage local conservation efforts, such as the Bates Hole Sage Grouse Conservation Working Group.
- Continue coordination with Wyoming Game and Fish Department (WGFD) on planning efforts and management activities.

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- Consider protecting lands within the boundaries of or adjoining WGFD Wildlife Habitat Management Units (Rawhide, Table Mountain, Springer/Bump Sullivan, and Cottonwood) and lands adjacent to Glendo, Gurnsey and Gray Rocks Reservoirs from disposal or mineral leasing.
 - Review existing fences and consider fence modifications to improve wildlife movement and coordinate with adjacent landowners to develop wildlife-friendly fencing.
 - Review water developments contained in the existing RMP for wildlife, especially pronghorn and mule deer.
 - Address the effects of roads on wildlife and its habitat, particularly habitat fragmentation, habitat loss, and wildlife disturbance, especially in areas of intense resource development.
 - Support the development of new reservoirs and provide protection from development or disposal in key sport fisheries areas.

3.1.5 Geology and Geologic Hazards

The geology and geologic hazards section of the RMP revision will include a discussion of physiography, earthquakes, landslides, topography, floods, snow slides, and slumps. No geology specific comments were received during the scoping period.

3.1.6 Lands and Realty

The BLM lands and realty section of the RMP revision will include a discussion of rights-of-way for pipelines, utilities, and roads; land acquisition and disposal; easements; withdrawals; land use authorizations; and trespass identification and abatement. Lands and realty comments ranged from multiple use land management and preserving public lands to specific methods of land management such as land exchanges or easements. Several requests or comments regarding specific geographic areas, resources, or resource uses were provided. There were 33 comments related to lands and realty all of which appear in Appendix A. A summary of the comments follows:

- Consider existing lease agreements and other programs such as easements, land exchanges, allotments, withdrawals, disposals, and land tenure and how they might be impacted by new decisions.
- Consider preservation of public land, resource conservation, minimal regulations, and multiple use management in the RMP revision.
- Include programs such as land tenure adjustment or exchange to mitigate issues associated with isolated tracts of land (e.g., access, trespass).
- Continue coordination with county governments, specifically county comprehensive plans.

3.1.7 Livestock Grazing

The livestock grazing section of the RMP revision will include a discussion of grazing allotment issues, grazing leases, range improvement projects, livestock fences, livestock reservoirs, springs, water wells, and vegetative treatments. The majority of the livestock grazing comments focused on considering fence modifications to improve wildlife movement and coordinating with adjacent landowners to develop wildlife-friendly fencing; considering the economic effects of management actions on the local agricultural community; and addressing the impacts on range conditions from drought, wildlife, and horses. Several requests or comments regarding specific geographic areas, resources, or resource uses were provided. There were 46 comments related to livestock grazing all of which appear in Appendix A. A summary of the comments follows:

- Continue coordination with ranchers, public, and interested stakeholders.
- Consider multiple management strategies including habitat improvements, determining manageable pasture size, and fencing techniques.
- Include programs to implement management strategies that improve “P” class allotments.
- Consider including monitoring programs to help improve rangeland condition.
- Include programs that strive to balance wildlife and grazing management.

3.1.8 Mineral Resources

The mineral resources section of the RMP revision will include a discussion of leasable, locatable, and salable minerals. Leasable minerals within the planning area include coal and oil and gas, which includes coalbed natural gas. Uranium and bentonite represent some of the locatable minerals in the planning area. Salable minerals include sand and gravel, clay, limestone, and decorative stone. Mineral resource comments were received regarding oil and gas development and exploration; drilling methods; surface or water resource disturbance; and potential impacts to other resources or resource uses such as wildlife and recreation. Several requests or comments regarding particular geographic areas, resources, or resource uses were provided. There were 57 comments related to mineral resources all of which appear in Appendix A. A summary of the comments follows:

- Incorporate techniques including directional drilling and lease stipulations regarding pad spacing near habitat management areas to reduce impacts to surface resources.
- Consideration of directional drilling as a mitigation tool is inappropriate for planning level analyses.
- BLM should not make assumptions that industry can directional drill in any situation. Need to consider economics and technical feasibility when making this determination.
- Address coalbed methane related to surface development and water resources.
- Incorporate methods to calculate disturbance; employ least restrictive mitigation measures; develop monitoring programs; and accomplish reclamation into the RMP revision.

-
- Methods which are used to calculate surface disturbance should take into consideration land which has already been reclaimed.
 - Protect and enhance opportunities to explore for and develop oil and gas including allowing the use of new technology, lessening restrictive surface management practices, and increasing access to public lands.
 - Consider existing lease agreements and lease stipulations and how they might be impacted by new decisions. Valid existing lease rights cannot be changed by a new RMP.
 - Consider the relationship between surface land management and subsurface resource development, including the compatibility of exploration and development activities with multiple-use and recreation as well as multiple mineral development.
 - Evaluate potential socioeconomic impacts, access to public land, and other considerations closely related to mineral development.
 - The BLM should ensure that access to State lands for subsurface mineral development is maintained when imposing federal prescriptions on surrounding public land.
 - Address foreseeable level of oil and gas development and potential impacts to other resources and resource uses.
 - Identify all areas where mineral development exists.
 - Consider the withdrawal of mineral leases associated with specific habitat units.
 - Provide realistic opportunities for the development of oil and natural gas on federal lands with only necessary restrictions on surface use.
 - Incorporate the Energy Policy and Conservation Act (EPCA) inventory results.

3.1.9 National Historic Trails

The National Historic Trails section of the RMP revision will include trails associated with overland migration, frontier military activities and early transportation, including the California, Oregon, Mormon Pioneer, and Pony Express Trails. The majority of comments on National Historic Trails focused on protecting historic trails via viewshed protection, NSO restrictions, and well-defined compatible uses; conducting Section 106 review; and encouraging public use and recreational opportunities. There were 13 comments related to National Historic Trails all of which appear in Appendix A. A summary of the comments follows:

- Retain the existing RMP measures to protect National Historic Trails until such time as the Wyoming Historic Trail Management Plan is completed.
- Ensure adequate viewshed protection (e.g., buffer zone) for National Historic Trails within the planning area.

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- Conduct a Section 106 review before designating any areas in and around National Historic Trails as open for activities that may allow surface occupancy.
 - Adopt NSO restrictions and additional necessary stipulations for leases in order to avoid and minimize potential adverse effects on cultural and historic properties.
 - Provide adequate buffer zones to ensure that surface activities will not adversely impact National Historic Trails viewshed.
 - Attach cultural resource restrictions and stipulations for areas open for oil and gas development outside of the buffer zone protection area.
 - Restrict activities by applying NSO restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.
 - Maintain visual and physical integrity of historic trails.
 - Be specific about compatible uses for historic trails.
 - Encourage public use of historic trails by marking routes.
 - Provide recreational opportunity related to historic trails.

3.1.10 Off-Highway Vehicles

The off-highway vehicles section of the RMP revision will include a discussion of OHV access, user conflicts, and trails for OHV use and/or restrictions. The OHV comments mainly related to the management of OHV use; planning for when and where OHV and all-terrain vehicle (ATV) use can occur or will be restricted; overall transportation planning; and the maintenance or reduction of roads. Several requests or comments regarding particular geographic areas, resources, or resource uses were provided. Four comments were specific to Poison Spider Park. There were 27 comments related to off-highway vehicles all of which appear in Appendix A. A summary of the comments follows:

- Comply with Section 106 of the National Historic Preservation Act (NHPA) prior to OHV class designations.
- Examine multiple management tools, including monitoring and educational programs, road surfacing, designating use areas, noise limitations, and closure and temporary closure.
- Develop additional ATV trail and OHV park systems.
- Consider developing a second OHV park or make additional land available for OHV use.

3.1.11 Paleontology

While there were no specific comments relating to paleontology, the paleontology section of the RMP revision will include a discussion of the known and potential distribution of fossil resources, active research issues, and permits.

3.1.12 Recreation

The recreation section of the RMP revision will include a discussion of sightseeing, touring, hiking, mountain biking, backpacking, photography, wildlife viewing, camping, fishing, and hunting. The focus of comments in this section was on recreational access. Several comments encouraged various forms of recreation and compatibility with oil and gas exploration. Comments on OHV can be found in the OHV section. Other requests regarding particular geographic areas, resources, or resource uses were provided. There were 20 comments related to recreation all of which appear in Appendix A. A summary of the comments follows:

- Consider compatible uses such as oil and gas exploration and development and semi-primitive recreation.
- Increase public access to the North Platte River and other important recreational areas.
- Consider programs that promote recreational opportunities related to historic trails and backcountry byways.
- Open historic trails and livestock routes to recreational use.
- Provide access points signs and identify property lines so that public land visitors may more effectively use public lands.

3.1.13 Renewable Energy

The renewable energy section of the RMP revision will include a discussion of wind energy, geothermal resources, solar power energy and other renewable sources. There were two comments related to renewable energy. One comment was on preparing a “Statement of Adverse Energy Impact;” the other that the Department of Energy is studying the feasibility of a wind farm in the planning area. Appendix A contains the comments relating to renewable energy.

3.1.14 Social and Economic Conditions

The social and economic conditions of the RMP revision will include health and safety, county level economic development information, and environmental justice. The methodologies for the socioeconomic analysis were the primary focus of comments in this section. There were 11 comments related to social and economic conditions all of which appear in Appendix A. A summary of the comments follows:

- Consider employment and beneficial revenues of mineral development and exploration, hunting and fishing, and other revenues on the counties in the planning area.

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- Address foreseeable level of oil and gas development.

3.1.15 Soil

The soil section of the RMP revision will include a discussion of soil disturbance from mineral extraction, erosion, and surface runoff. There were 11 comments related to soil all of which appear in Appendix A. The comments focused on analyzing impacts from surface disturbance. A summary of the comments follows:

- Consider addressing reasonable mitigation measures.
- Consider the effect of surface resource management on subsurface development opportunities and activities.
- Address coalbed methane related to surface development and water resources.
- Provide opportunities for development of oil and gas with only necessary restrictions on surface use.

3.1.16 Special Designations

The special designations section of the RMP revision will include a discussion of designated areas such as Areas of Critical Environmental Concern (ACECs), National Historic Trails, Wild and Scenic Rivers, and Wilderness Study Areas. ACEC nominations are also discussed in Section 3.4. The focus of the special designation comments was on protecting wilderness quality and managing specific areas for adequate protection. There were 16 comments related to special designations all of which appear in Appendix A. A summary of the comments follows:

- Identify and protect lands of wilderness quality.
- Manage the Cedar Ridge-Badwater Creek area as a SMA.
- Designate SMAs for key wildlife habitats.
- Designate ACECs in various locations.

3.1.17 Special Status Species

The special status species section in the RMP revision will include a discussion of plant and animal species that are listed or proposed for listing as threatened or endangered in accordance with the Endangered Species Act (ESA). It also includes BLM-designated sensitive species. There were 15 comments related to special status species all of which appear in Appendix A. These comments focused on special status species or requesting special listing for certain species. A summary of the comments follows:

- Consider specific species and their habitats. Some suggestions include sage grouse, prairie dogs, big game crucial ranges, raptor and mountain plover nesting areas, and swift fox.

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- Consider the sensitivity ratings of non-game fish.
 - Protect habitat using tools such as seasonal stipulations, designations of SMAs, and restoration.
 - Consider the multiple use mandate and limiting restrictions related to special status species in order to lesson economic impacts.

3.1.18 Transportation and Access

The transportation section of the RMP revision will include a discussion of access to public lands, mass transit, and infrastructure management. The majority of comments in this section related to transportation and access focused on ensuring access to public lands for recreational uses, oil and gas and mineral development, and general purposes; addressing private land trespassing; and ensuring the acceptability of equestrian transportation on BLM lands. There were 26 comments related to transportation and access all of which appear in Appendix A. A summary of the comments follows:

- Consider reduced access to public lands for purposes of exploring for and producing oil and gas resources as a separate issue from economic impacts.
- Maintain access to state and private lands surrounded by BLM land.
- Address transportation planning that includes off-road use and its probable increase in the future.
- Include and promote actions such as conservation easements and land exchanges to accomplish easy management and access.
- Consider public access in realty actions.
- Identify public access to the North Platte River as a critical issue.
- Include equestrian use an acceptable means of transportation and recreation on all BLM lands.
- Provide access to BLM land northeast of Casper in Area 25.
- Minimize the number of roads on BLM lands.
- Address the issue of access and trespassing across private land to reach public lands.
- Consider using only gravel on all weather roads.
- Ensure protection of historic roads and trails while maintaining today's allowed uses.

3.1.19 Utility and Communication Corridors

The utility and communication corridors section of the RMP revision will include a discussion of power and phone lines, fiber optic lines, rights-of-way, canals, ditches and cell phone towers. There were two comments related to utility and communications corridors. One requested that the BLM not allow above ground powerlines greater than 33 kilovolt (kv) and the other dealt with restrictions on utility corridors. Appendix A contains summaries of these comments.

3.1.20 Vegetation

The vegetation section of the RMP revision will include grassland and shrubland communities, riparian and wetland vegetation, woodlands and forests, and invasive, nonnative plant species, but does not include special status plants. There were 35 comments related to vegetation all of which appear in Appendix A. A summary of the comments follows:

- Maintain and improve vegetation communities important to wildlife.
- Continue to identify community enhancement opportunities.
- Address Proper Functioning Condition (PFC) and Potential Natural Community rankings and objectives.
- Conserve riparian habitats and consider the use of fencing to limit the effects of livestock grazing in these areas.
- Encourage the use of native species of vegetation during reclamation efforts after resource development and consider the needs of fish and wildlife.
- Incorporate aggressive management techniques and strategies to control the effects and spread of invasive, non-native plant species.
- Encourage the use of native species.

3.1.21 Visual Resources

The visual resources section in the RMP revision will include a discussion of scenic views, visual quality, Visual Resource Management (VRM), and overlooks. The majority of visual resource comments focused on monitoring and protecting the visual integrity of historic trails; using various management measures to protect viewsheds; allowing a diversity of landscapes; and managing visual resources with equal importance to other resources. There were 10 comments related to visual resources all of which appear in Appendix A. A summary of the comments follows:

- Consider multiple resource management and the compatibility of resources such as VRM, recreational user days and mineral development potential.
- Maintain the visual integrity of historic trails and other cultural resources for which integrity of setting is an integral component of site significance.
- Continue to work with land management agencies with adjacent lands for compatibility.

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- Continue to employ management techniques, mitigation measures, and standards to protect visual resources.

3.1.22 Water Resources

The water resources section in the RMP revision will include a discussion of water quality and quantity. The focus of water resource comments was on managing or prohibiting coalbed methane discharge into water bodies; the creation of reservoirs; floodplain issues; protection of springs and seeps; the use of best management practices (BMPs); and encouraging water developments for livestock and wildlife. There were 20 comments related to water resources all of which appear in Appendix A. A summary of the comments follows:

- Address coalbed methane and other mineral resources related to surface development and water resources.
- Include management programs and techniques to include protection of springs and seeps; development of new and rehabilitation of existing reservoirs; conversion of abandoned wells to water wells; and additional water developments.

3.1.23 Alternatives

The alternatives in the RMP revision will include a discussion of formulation of alternatives, definition of alternatives and preferred alternative. Alternatives will be developed during the next phase of the RMP revision. Comments on alternatives focused primarily on specific revision topics that could be used for alternative development. For example, some of the nominations listed in Section 3.4 may be considered in alternative development.

3.1.24 Content and Methodology

The content and methodology category includes the format of the RMP revision; geographic areas addressed in the planning process; analyses included or not included in the planning process; period of analysis; request for additional information; baseline definition; assumptions incorporated in the analysis; and, thoroughness of the analysis. These types of comments can be found under their respective revision topic.

3.1.25 Purpose and Need

The purpose and need section of the RMP revision will include a discussion of BLM goals and the need for RMP revision. There were no comments related specifically to the purpose and need of the RMP during the public scoping process. However, this will be addressed in the RMP revision and will include BLM goals and the need for RMP revision.

3.1.26 RMP Revision Process

The RMP revision section of this document addresses NEPA and FLPMA requirements, cooperating agencies, the public involvement process, and the objectivity of documents (Summary of the MSA, RMP, and Draft EIS). The majority of comments related to the RMP revision process focused on tribal and WGFD consultation; coordinating with ranchers, the public and interested

stakeholders; avoiding delay in oil and gas activities during the RMP revision; including mitigation measures; analyzing cumulative effects; and following other BLM mandates. There were 10 comments related to the RMP revision process all of which appear in Appendix A.

3.1.27 Mitigation Measures

The mitigation measures section in the RMP revision will include a discussion of measures to offset unavoidable impacts. The majority of these comments related to mitigation measures focused on mitigation measures for energy development; following BMPs; fencing for protection purposes; methods for re-using water; and strategies to minimize impacts from recreational uses. There were 14 comments related to mitigation measures all of which appear in Appendix A.

3.1.28 Cumulative Impacts

The cumulative impacts section of the RMP revision will include a discussion of the impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions (40 CFR 1508.7). The majority of cumulative impacts comments focused on including various management plans from other agencies and addressing impacts associated with the increasing intensity of land uses. There were 8 comments related to cumulative impacts all of which appear in Appendix A.

3.1.29 Regulatory Compliance

The regulatory compliance category addresses laws, executive orders, regulations and guidelines that will need to be implemented during the RMP revision process. The comments in this section related to compliance with Section 106 and 110 of the NHPA and following FLPMA's mandates. There were 9 comments related to regulatory compliance all of which appear in Appendix A.

3.2 Issues Raised That Will Not Be Addressed

At this early phase in the RMP process, all comments raised during the scoping period have been summarized in this scoping report. During the alternative formulation phase of the RMP revision process, BLM will refine the planning criteria and preliminary planning issues. Through this refinement, BLM will determine which issues are to be carried forward and which issues will not be addressed in the RMP revision process.

3.3 Valid Existing Management to be Carried Forward

Valid existing management practices that will be addressed in the RMP revision include continuing current management practices as is and bringing forward management actions from the existing RMP. The comments in this section showed support for continuing current management practices. There were 5 comments related to valid existing management to be carried forward all of which appear in Appendix A.

3.4 *Special Designation Nominations*

During the scoping process, various agencies and organizations proposed some areas to be nominated for special designations. Table 3-2 lists the name of the nominated area, proposed nomination category, who nominated the area, and the type of action requested. Most lands were nominated as an ACEC. One ACEC was recommended to be removed from ACEC designation and another area was recommended for being retained as an ACEC. One area was nominated as a TCP.

Table 3-2. Nominations for Special Designations

Name of Nomination/Resource Area	Proposed Category	Author or Organization Requesting Nomination	Type of Action
North Platte River Corridor	ACEC	WGFD; Sierra Club	Nomination
Casper Sand Dunes	ACEC	Sierra Club	Nomination
Hole in the Wall/Red Wall	ACEC	Sierra Club	Nomination
Muddy Mountain Environmental Education Area	ACEC	Sierra Club	Nomination
South Fork of the Powder River Watershed	ACEC	Sierra Club	Nomination
South Fork of the Powder River Roadless Area northeast of Notches Dome identified in the book Wild Wyoming	WSA	Biodiversity Conservation Alliance	Nomination
Prairie Dog complexes larger than 3,000 acres	ACEC	Biodiversity Conservation Alliance	Nomination
Emigrant Trails	ACEC	Sierra Club	Nomination
Teapot Dome	ACEC	Sierra Club	Nomination
Pterodactyl Track	ACEC	Sierra Club	Nomination
Table Mountain	ACEC	Sierra Club	Nomination
Jackson Canyon	ACEC	Sierra Club, WGFD	Retain
Salt Creek	ACEC	Sierra Club	Remove
Salt Creek	ACEC	WGFD	Retain
Little Medicine Falls	ACEC	Joe D. Reddick	Nomination
Cedar Ridge-Badwater Creek	TCP and SMA	National Trust for Historic Preservation	Nomination
South Big Horns-Red Wall	ACEC	WGFD	Nomination
Special Management Areas for Key Wildlife Habitats	SMA	WGFD	Nomination

3.5 Future Decisions to be Made

This scoping report does not make any decisions, nor does it change current management direction set forth in the existing RMP. It merely summarizes those issues identified during the scoping period for the Casper Planning Area. Issues identified in the scoping report, as well as subsequently identified issues, will be used by BLM to help formulate a reasonable range of alternatives during the next phase (i.e., alternative formulation) of the RMP revision process. Each identified alternative (including continuation of existing management) will represent a complete and reasonable plan for managing the Casper Planning Area. BLM's evaluation of identified alternatives will be documented in an EIS prepared as part of the RMP revision process and required by NEPA.

FLPMA requires BLM to plan for and manage public lands administered by the Secretary of the Interior, specifically through the BLM. The Casper Planning Area is currently being managed in accordance with decisions made in and subsequent to the 1985 Platte River Resource Area RMP. Future decisions to be made for the Casper Planning Area will occur at two levels: 1) the RMP level, and 2) the implementation level. In general, only RMP-level decisions will be made as part of the RMP revision process; however, for background, both decision levels are described below.

3.5.1 Future RMP-Level Decisions

Future RMP-level decisions to be made for the Casper Planning Area will be on a broad scale. These decisions will identify management direction and guide future actions for the next 10 to 20 years within the Casper Planning Area. The revised RMP will present a vision for the Casper Planning Area by providing a comprehensive yet flexible framework for managing the numerous demands on resources managed by BLM.

The vision for the Casper Planning Area will be described in the revised RMP in terms of desired outcomes, also known as “desired future conditions”. Desired future conditions or outcomes represent one of two categories of RMP-level decisions.

Desired future conditions described in the revised RMP for the Casper Planning Area are the first category of RMP-level decisions and will be expressed in terms of specific goals, standards, and objectives. Goals are broad statements of desired outcomes (e.g., ensure sustainable development). Standards are descriptions of conditions or the degree of function required (e.g., land health standards). Objectives are specific, quantifiable and measurable desired conditions for resources (e.g., manage sagebrush communities to achieve a certain canopy cover by the year 2015).

The second category of RMP-level decisions, allowable uses and actions to achieve desired future conditions, will be expressed in the revised RMP as allowable uses, actions needed, and land tenure decisions. Livestock grazing, administrative designations (e.g., ACECs), and land disposal are examples of some RMP-level decisions in this category.

3.5.2 Future Implementation Decisions

The revised RMP and associated RMP-level decisions normally do not result in any immediate on-the-ground actions within the Casper Planning Area. The RMP must be implemented to carry out any on-the-ground actions or activities. Implementation decisions are those decisions to take action to implement the RMP. Implementation decisions are often referred to as project-level or activity-

level decisions and represent BLM's final approval of on-the-ground actions. Implementation decisions require a more detailed site-specific environmental analysis that will tie back to (i.e., tier to) the EIS prepared for the RMP revision. It is noted that in some limited circumstances, site-specific implementation decisions may be made through the RMP revision process.

For the purposes of this scoping report, issues identified during the scoping process are not organized as to the type or category of decision they may relate to. Instead, the comments summarized in the scoping report, along with subsequently identified issues, planning criteria, and other information (e.g., occurrence and development potential for minerals) will be used to formulate a reasonable range of alternatives that addresses significant planning issues identified during the RMP revision process.

4.0 DATA SUMMARY AND DATA GAPS

Data gaps were not specifically identified during scoping. However, data adequacy for Geographic Information System (GIS) layers associated with the Casper Field Office can be found in the Casper GIS Master Data List.

Missing datasets not identified on the GIS Master Data List include:

- 303 Streams – Does not exist
- Stream PFC – Partially complete
- Paleontology Sites – Partially complete
- Cultural Sites – Partially complete
- Visual Resources Inventory – Does not exist
- Prebles Meadow Jumping Mouse – Partially complete
- Walk-in Hunting Areas – Not digital

Additional information concerning available data and data gaps may be obtained by calling the Casper Field Office.

5.0 SUMMARY OF FUTURE STEPS IN THE PLANNING PROCESS

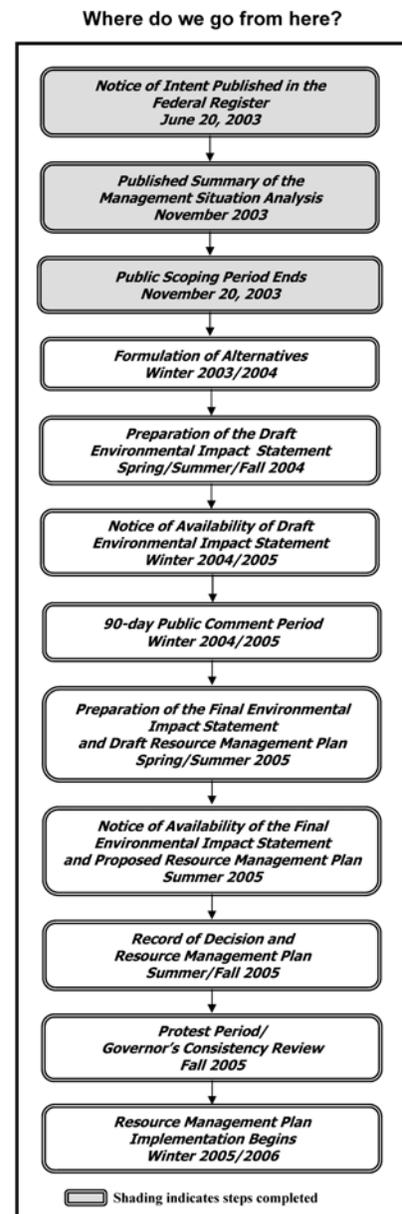
Future steps in the RMP revision process are described briefly in this section and on BLM's RMP website. Upon the close of the scoping period on November 20, 2003, management alternatives will be developed for detailed impact analysis. In compliance with NEPA, CEQ regulations, and the BLM planning regulations and guidance, alternatives should be reasonable and should be capable of implementation. A detailed analysis of each of these alternatives and the no action alternative will be conducted, documented and completed by the end of winter 2004.

Based upon the analyses of the alternatives, the Preferred Alternative (i.e., the alternative preferred by the BLM) will then be selected and analyzed in detail. The Preferred Alternative is often made up of a combination of management options from the other alternatives that provide the best mix and balance of multiple land and resource uses to resolve the issues with existing management in the planning area.

Next, the Draft EIS for the Casper RMP revision will be prepared in the Spring, Summer and Fall of 2004. The Draft EIS will in detail, analyze the possible impacts of each of the proposed alternatives on the existing planning area environment. Once the Draft EIS is complete, a Notice of Availability (NOA) of the Draft EIS will be issued in the Federal Register which will initiate a formal public review and 90-day comment period to solicit input from tribal, state, and local governments, other federal agencies, and the public (see 43CFR1610.2[e]). The issuance of the NOA and the public comment period will take place in Winter 2004/2005.

Following the public review and comment period on the Draft EIS, the Final EIS will be prepared in the spring and summer of 2005. Based upon public comment, any new information and correction of errors in the Draft EIS, the Final EIS will present the Proposed RMP decisions along with the other alternatives.

Another NOA will be issued in the Federal Register for the Final EIS and Proposed RMP in summer of 2005, after which there will be a concurrent 60-day Governor's consistency review and a 30-day protest period on the Proposed RMP and Final EIS. Any protests submitted during this time will be resolved and both the Record of Decision (ROD) for the EIS and the approved RMP decisions may be prepared in one document and issued to the public in the summer/fall of 2005. Finally, implementation of the RMP will be initiated in the winter of 2005/2006. RMP implementation is dependent on many factors including available funding.



APPENDIX A

SUMMARY OF PUBLIC SCOPING COMMENTS

Appendix A provides a summary of scoping comments organized by revision topics. The comments in this appendix are not necessarily exact copies from the comment letters and forms, they are summaries of comments. Copies of the original comment letters and forms can be found in Appendix B. To ensure that all comments are addressed during alternative formulation, some comments are listed under multiple revision topics.

Air Quality

Letter #	Author	Comment
CSL-0013	State of Wyoming, Department of Environmental Quality	The RMP revision should address impacts of smoke from prescribed fire on public health, nuisance and visibility.
		The RMP should recognize State primacy for air quality under the Clean Air Act.
		Review air quality regulations relative to management actions.
CSL-0045	Wyoming Farm Bureau Federation	The RMP should encourage the BLM and State of Wyoming to work together on air quality issues.
		The RMP should recommend the use of prescribed fire, if a wildfire would produce larger impact to air quality.

Cultural Resources

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Bureau of Land Management (BLM) should consult with the tribes indigenous to the Casper Planning Area
CSL-0002	Anadarko Petroleum Corp.	The existing Resource Management Plan (RMP) decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP.
CSL-0003	National Trust for Historic Preservation	Take greater responsibility for evaluating and protecting cultural resources.
		Survey land for cultural resources that have not been previously identified or evaluated.
		Develop proactive measures to protect cultural resources from mineral development.
		Incorporate specific cultural management plans into alternative development.
		Outline cultural issues and potential areas of interest at outset of RMP process.
		Engage in consultation with Native Americans early in planning process to address concerns and identify culturally significant areas.
		Integrate President Bush's "Preserve America" stewardship mandates into the RMP.
		Integrate Section 110 of the National Historic Preservation Act (NHPA) into the RMP process by identifying, evaluating, and nominating properties to the National Register.
		Adopt specific measures to protect cultural resources from artifact collectors, looters, and vandals.
		Ensure that allowed uses within the area will not diminish BLM's ability to identify and protect historic properties in the future.
		Nominate the Cedar Ridge-Badwater Creek area to the National Register of Historic Places as a Traditional Cultural Property.

Cultural Resources (continued)

Letter #	Author	Comment
CSL-0003 (continued)	National Trust for Historic Preservation	Manage the Cedar Ridge-Badwater Creek area as a Special Management Area to ensure adequate protection.
		Adopt “No Surface Occupancy” restrictions and additional necessary stipulations for Leases, in order to avoid and minimize potential adverse effects on cultural and historic properties.
		Identify all threats to cultural resources and the natural condition of public lands (including off-road vehicle (ORV) and other recreational activities).
		Follow mandates in BLM’s Cultural Resource Management Plan (CRMP) manual.
		Establish as a goal the protection, conservation, and, where appropriate, restoration, of archeological and historic sites and landscapes in the Casper field area.
		Determine the sites or areas that are most vulnerable to current and future adverse impacts and adopt management actions necessary to protect, conserve, and restore cultural resources.
		Outline specific management actions, such as stabilization, fencing, signage, closures, or interpretative development, to protect, conserve and, where appropriate, restore cultural resources.
		BLM should comply with Section 106 of the NHPA prior to designating areas for ORV use.
		Restrict activities by applying No Surface Occupancy (NSO) restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.
CSL-0007	Wyoming Department of State Parks and Cultural Resources, State Historic Preservation Office	Special attention should be given to the protection—particularly viewshed protection—of historically important transportation corridors (e.g., trails, roads, railroads) and the Cedar Ridge Native American Traditional Cultural Property (TCP).
		Provide an in-depth overview and situational analysis of BLM-managed cultural resources in the Casper Planning Area.
CSL-0030	Joe D. Reddick	Protect historic Fort Fetterman and Little Medicine (Box Elder) Roads while allowing today’s uses.
		Protect pristine “ruts”/station sites of historic trails.
		Encourage public use of historic trails by marking routes.
		Encourage historical re-enactment.
CSL-0031	G. Eugene Hardy	It is a mistake to make the public aware of items or sites of interest (archeological/historic/cultural/etc.).

Fire Management

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should institute a big sagebrush natural fire policy in place of controlled burns.
CSL-0011	Wyoming Game and Fish Department	Include guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage Grouse Conservation Plan (June 2003), Guidelines to Manage Sage Grouse Populations And Their Habitats (Connelly et al. 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (Wyoming Game and Fish Department [WGFD] and Wyoming BLM 2002).
		Address past and future uses of fire and its proper implementation for specific purposes, as well as post-treatment management and monitoring.
CSL-0013	State of Wyoming, Department of Environmental Quality	Address impacts from using fire as a management tool.
		Identify where and under what conditions to use fire as a management tool including the identification of areas to be managed as full suppression, limited suppression and no suppression with regard to wildland fire management.
		Address impacts from fire (smoke, public health, etc.).
CSL-0025	Clyce McCulloch	Prescribe burn a larger area at a time.
CSL-0029	Facilitator Notes	BLM needs to react to prescriptions when window is offered.
		Address prescriptions in mahogany on a landscape base.
CSL-0039	Kenneth Small	Proceed with more prescribed burning.
CSL-0043	Robert, Rita and Jock Campbell	Prescribed fires as a management tool in our area would be questionable due to the risk of establishment or expansion of invasive non-native plant species.
CSL-0044	WGFD	Address pre-treatment and post-treatment (prescribed fire) management, which includes rest to build fuels prior to treatment and rest following treatment to facilitate vegetative recovery.
		Aspen should be specifically included as a resource that will benefit from the use of fire, and fire should be actively reintroduced back into the aspen community.
		Burned areas offer an excellent opportunity for establishment or expansion of non-native plant species. We recommend incorporating a provision into the fire program that will allow for the use of chemicals to prevent, reduce, and/or control the potential that exists for establishment and/or expansion of weed species. This provision should be programmatic in planning processes, including post-management activities following a wildland fire.
CSL-0045	Wyoming Farm Bureau Federation	Efforts to enhance range conditions by prescribed fires should be utilized as much as possible and the Agency needs to examine its prescribed fire protocols to ensure they don't serve as an impediment to fire use.

Fish and Wildlife

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should require adequate protection for sage grouse. The absolute minimum measure that should be emplaced is a NSO (and no vegetation treatments) within 2 miles of a sage grouse lek.
		The Casper RMP revision should require adequate protection for prairie dogs. Require NSO stipulations for all prairie dog colonies with a ½ mile buffer.
		The BLM should designate all Prairie Dog complexes larger than 3,000 acres as areas of critical environmental concern with additional protections such as moratorium on recreational shooting.
		The Casper RMP revision should adequately protect big game crucial ranges. Require NSO stipulations to be placed on all big game crucial ranges (crucial winter, winter yearlong, severe winter relief and calving ranges) with no opportunity for waiver.
		The Casper RMP revision should adequately protect raptor nesting habitat.
		Nesting mountain plover areas that are identified should be protected with NSO stipulations, with a minimum ½ mile NSO buffer.
		The Casper RMP revision should protect populations of rare native warmwater fishes.
		The Casper RMP revision should mandate directional drilling to reduce wildlife habitat impacts.
		The new RMP should consider the forthcoming Heart of the West Wildland Network Design and be compatible with its recommendations.
		The Casper RMP revision should minimize fences on public lands, remove unpermitted fences, and bring all fences into compliance with WGFD standards.
CSL-0002	Anadarko Petroleum Corp.	Discussion of potential stipulations regarding non-Endangered Species Act (ESA) species should recognize BLM’s lack of authority to enforce the stipulations or studies on private property.
CSL-0004	WGFD	Incorporate Swift Fox conservation measures into RMP.
		Analyze the Swift Fox in the environmental impact statement (EIS).
		Include Swift Fox on BLM state list of sensitive species.
CSL-0005	Wyoming Department of Agriculture	Consider impacts to resources from wildlife and horses.
CSL-0011	WGFD	Evaluate action items from the 1985 RMP to help determine continuing issues and concerns for the new RMP.

Fish and Wildlife (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Review fence modifications to improve pronghorn movements and development of permanent water sites for pronghorn in 1985 plan.
		Review water development for mule deer from 1985 plan.
		Review status of wildlife management covered under the remaining segments of the Planning Decisions section in 1985 plan.
		Restore streambank cover to enhance riparian habitat on portions of Buffalo Creek and Trout Creek in 1985 plan.
		Address declining shrub (mahogany and sagebrush) habitat conditions for wildlife.
		The RMP should consider the sensitivity ratings of various non-game fish in habitat management.
		Address impacts of the drought on wildlife habitat.
		Evaluate the impacts of OHV use on wildlife habitat and wildlife use of the habitat.
		Address the foreseeable level of oil and gas development and the probable impacts it has on wildlife and habitat.
		Include cumulative impacts associated with mineral, oil or gas extraction on biological resources.
		Address mitigation approaches to minimize impacts from mineral, oil, or gas extraction.
		Include guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage Grouse Conservation Plan (June 2003), Guidelines to Manage Sage Grouse Populations And Their Habitats (Connelly et al. 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (WGFD and Wyoming BLM 2002).
		Encourage localized conservation efforts, such as the Bates Hole sage grouse conservation working group.
		Maintain and improve key wildlife habitats.
		Maintain and improve sagebrush important for maintaining wildlife habitats.
		Continuation of existing Habitat Management Plans (HMP) and formulation of necessary additional HMPs.
		Designate special management areas for key wildlife habitats.
		Implement seasonal stipulations to protect key wildlife habitats during important seasons of use.
Address past and future uses of fire and its proper implementation for specific purposes, as well as post-treatment management and monitoring on habitat.		
Adequate habitat for sensitive species and prevention of future listings of these species. Reference WGFD plan for high priority nongame species for habitat management in key areas.		

Fish and Wildlife (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	BLM should consult with WGFD for data that would ensure crucial ranges and riparian areas are conserved and that harvest can occur to meet herd objectives.
		WGFD recommends that the RMP address withdrawal of mineral leasing associated with our Habitat Units and the lands adjacent to the Glendo, Gurnsey and Gray Rocks Reservoirs.
		The ability to implement habitat improvements on existing allotments. These actions could happen easier by temporarily relocating livestock on vacant allotments while the regular allotment is being treated.
		Address the effects of roads on wildlife and habitat loss and fragmentation, particularly in areas of intensive energy development.
		The lack of specific allotment planning is a concern particularly in key wildlife habitat areas.
		Address waterfowl nesting cover at Goldeneye Reservoir.
		Address the ability to move animals into or out of specific areas for the purposes of managing or re-establishing fish and wildlife populations.
		The ability to maintain and, where needed, improve crucial winter ranges is a concern. Assure that adequate forage is available to wildlife during the necessary seasons of use.
		Manage forest cover habitat to maintain and enhance habitat and thus wildlife diversity.
		Support the creation of new reservoirs that provide sport fisheries and wildlife habitat and the rehabilitation of existing reservoirs in the 33-mile area. Would like to coordinate with BLM to develop Recreation Management Area Management Plan for the 33-mile area.
		Address protection of springs and seeps. Suggest protecting springs and seeps through fencing and adjacent water development.
Reclamation following development should require native species of vegetation and consider the needs of fish and wildlife.		
CSL-0030	Joe D. Reddick	Temporary impacts from mineral development is acceptable; restore afterwards threatened and endangered species habitats and other wildlife habitats.
CSL-0033	Archie Bruner	Address domestic agriculture as a benefit to natural land uses.
CSL-044	WGFD	WGFD recommends the BLM maintain and/or improve the following HMPs: Bolton Creek, Ferris-Seminole, Grayrocks Reservoir, Laramie Peak Bighorn Sheep, Rawhide Wildlife Area, Springer/Bump-Sullivan Wildlife, Table Mountain Wildlife, and Goldeneye.

Fish and Wildlife (continued)

Letter #	Author	Comment
<p>CSL-044 (continued)</p>	<p>WGFD</p>	<p>WGFD recommends four additional 1-acre exclosures within the Table Mountain Wildlife Area, and proportionately manage livestock grazing animal unit months (AUM) to account for the existing and additional exclosures.</p>
		<p>WGFD recommends a Bates Hole HMP, which would incorporate the existing Bates Creek Aquatic HMP and Bates Creek Reservoir HMP.</p>
		<p>WGFD recommends a 33-mile HMP, which would incorporate the existing 33-Mile Reservoir HMP, Railroad Grade Reservoir, Bishop Waterfowl HMP, Camel Hump Reservoir Wildlife and Recreation Area, and Teal Marsh Reservoir.</p>
		<p>WGFD recommends the BLM evaluate the progress of HMP goals and objectives, on an annual basis, and provide a status report to those agencies with Cooperating Agency Status.</p>
		<p>WGFD recommends the BLM coordinate reservoir design and development with WGFD personnel. Furthermore, WGFD requests 50 percent of the reservoirs created meet specifications for fisheries development. To meet fish management concerns, specifications should include a minimum depth of 10 feet, fencing an amount of uplands (headwaters area) adjacent to the reservoir 3 times the size of the reservoir surface acreage (3 upland acres: 1 surface acre ratio), and reservoir designs to include erosion control structures on the downstream outlet, providing roads to access the reservoir, and the emergency spillway being seeded with native grasses.</p>
		<p>BLM take aquatic management issues and concerns into consideration when addressing riparian area management, road development and management, watershed health, etc.</p>
		<p>WGFD recommends the BLM allocate forage resources for wildlife in order to sustain WGFD big game population objectives and other wildlife populations.</p>
		<p>The BLM work collaboratively with WGFD in developing, funding and utilizing remote sensing (landscape level landcover classifications) as a basis for landscape level inventory, establishing wildlife habitat monitoring areas based upon inventories, and sharing previously collected wildlife habitat monitoring data.</p>
		<p>The BLM should review the status of lands withdrawn for stock driveway use, and consider creating grassbanks if the area of land would be large enough to facilitate grassbank activities. WGFD recommends that salt and mineral locations within each grazing allotment be placed a minimum of ½ mile away from any water source and/or riparian area.</p>
<p>CSL-0045</p>	<p>Wyoming Farm Bureau Federation</p>	<p>Too much emphasis has been given to wildlife management and more of a balance should occur in those areas where there are wildlife and livestock issues.</p>

Fish and Wildlife (continued)

Letter #	Author	Comment
CSL-0045 (continued)	Wyoming Farm Bureau Federation	The lack of information relative to habitat needs of Threatened, Endangered, Candidate, and Sensitive species have lead the Agency to restrict other economic uses on federal lands in order to “be safe” even if the Agency is unsure. The Agency should be more aggressive in defending the multiple use mandate where habitat needs for listed or candidate and sensitive species is incomplete or lacking.

Lands and Realty

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The new RMP should forbid industrial development on floodplains.
CSL-0009	Office of State Lands and Investments	Maintain access to lands (state and private) surrounded by BLM.
		Encourage a balanced approach to the use of the area’s resources with minimal regulation when appropriate.
		Maintain access to state lands for mineral development.
CSL-0011	WGFD	Include and promote actions such as conservation easements and land exchanges to facilitate land management and public access.
		WGFD recommends that the RMP address withdrawal of mineral leasing associated with our Habitat Units and the lands adjacent to the Glendo, Gurnsey and Gray Rocks Reservoirs.
		Do not include lands within the boundaries of or adjoining Wildlife Habitat Management Units (Rawhide, Table Mountain, Springer/Bump Sullivan, and Cottonwood) as lands targeted for disposal or mineral leasing.
		Do not dispose of federal land regardless of size which has legal access particularly BLM land adjacent to Glendo, Gurnsey, and Grayrocks reservoirs.
		The RMP should mitigate for development.
		WGFD recommends that the SW ¼ section of section 31, T34, R76 not be considered for disposal since it connects four state sections of river in an area that supports a trout fishery of 500 fish per mile greater than 6 inches and an uninterrupted riparian corridor for wildlife. Similarly, BLM properties in section 1, T24, R63, section 30, T25, R62, and section 25, T25, R63 are contiguous with the Rawhide Wildlife Habitat Management Area and WGFD asks that they not be disposed.
CSL-0014	Florenc Williamson	Manage for preservation of public lands (no development).
CSL-0015	Mahlon and Joan Frankhauser	Preserve public lands and scenic beauty.

Lands and Realty (continued)

Letter #	Author	Comment
CSL-0028	Tom Preuit	If land comes up for sale, he wants to have the first right of refusal.
CSL-0029	Facilitator Notes	Need land tenure adjustment for small isolated tracts.
		Need access across private land to reach public lands.
CSL-0030	Joe D. Reddick	Sell the lots in the Esterbrook townsite.
		Sell scattered isolated tracts of public lands because ineffective to manage.
		Only gravel all weather roads.
		Identify areas for land exchange.
CSL-0031	G. Eugene Hardy	Dispose of scattered parcels of BLM lands.
		No more land acquisition by BLM.
		Multiple uses of BLM lands must be maintained.
CSL-0033	Archie Bruner	Address resource conservation.
		Aggressive industry and human interference distract from the natural resources of the land.
		The fundamentals of nature should be the foundation of land use and economic development to protect air, water, soil, and future life.
CSL-0035	Natrona County Development Department	Natrona County would like to incorporate findings of the RMP into Natrona County land use planning documents.
CSL-0039	Kenneth Small	Possible land transfer. Our lease included a 40-acre parcel in the NE ¼, SE ¼ of sec 25, R70, 722. We would be interested in either purchasing this parcel or trading it to the BLM for a same sized tract that would be adjacent.
CSL-0044	WGFD	WGFD recommends the BLM not dispose of any public lands within and/or adjacent to Wyoming Game and Fish Commission Wildlife Habitat Management Areas, lands adjacent to the North Platte River, lands that are currently accessible to recreationists (i.e., hunters, anglers, etc.), and lands that facilitate access to larger blocks of public lands.
		WGFD requests the BLM target land acquisitions, trades, exchanges, and/or easements that facilitate increased public access to the North Platte River, access to adjacent public lands, grassbank creation, and management of crucial wildlife habitats.
		WGFD recommends the BLM not dispose of public lands where production has occurred simply because they have been developed (i.e., utilities and roads are present).

Lands and Realty (continued)

Letter #	Author	Comment
CSL-0044 (continued)	WGFD	WGFD requests the public lands within Township 23 - 24 and Range 69 - 70 (Muleshoe Flats) remain intact and not be sold, traded and/or exchanged due to the valuable public access these lands provide for hunting opportunities. These lands should be actively managed for the purpose of maintaining and/or enhancing wildlife habitat and existing wildlife populations.
CSL-0045	Wyoming Farm Bureau Federation	In areas where land ownership can be adjusted, the BLM needs to pursue those options aggressively to address access issues.
		There are several management options which could help mitigate these misunderstandings. In areas where land ownership can be adjusted, the BLM needs to aggressively pursue these options if there is a willingness by the landowner to trade or purchase BLM lands.

Livestock Grazing

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should minimize fences on public lands, remove unpermitted fences, and bring all fences into compliance with WGFD standards.
CSL-0005	Wyoming Department of Agriculture	Discuss effects of BLM management actions on grazing activities.
		Discuss the economic effect of management actions on agricultural producers and local community.
		Discuss the cumulative impacts to ranchers.
		Work cooperatively with all grazing permittees and agriculture producers.
		Consider impacts to resources from wildlife and horses.
		Work cooperatively with public and interested stakeholders.
CSL-0011	WGFD	The ability to implement habitat improvements on existing allotments. These actions could happen easier by temporarily relocating livestock on vacant allotments while the regular allotment is being treated.
		Riparian area management is a concern and should consider fencing riparian areas to achieve objectives.
		Recommend RMP address grass banks.
		Need to evaluate action items from the 1985 RMP to help determine continuing issues and concerns. These include: Fence modifications; water development; and restoration of streambank cover.
		More water development on public lands to benefit livestock and wildlife.
		Protection of springs and seeps is an issue.

Livestock Grazing (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Support the creation of new reservoirs that provide sport fisheries and wildlife habitat and the rehabilitation of existing reservoirs in the 33-mile area.
		The RMP should assure that adequate forage is available to wildlife.
		The lack of specific allotment planning is a concern, particularly in key wildlife habitat areas.
		Address the ability to move animals into or out of specific areas for the purposes of managing or re-establishing fish and wildlife populations.
CSL-0023	Facilitator Notes	Reduce stress on range by reducing (managing) antelope herds.
CSL-0027	Bernard R. McGuire, Jr.	Would like management of public lands to remain the same.
CSL-0028	Tom Preuit	Wants his grazing lease to stay the way it is now.
CSL-0030	Joe D. Reddick	Use pasture size as a method to provide diversity of landscape.
		Set an average pasture size standard.
		Remove or limit electric fence use.
CSL-0031	G. Eugene Hardy	Encourage more water developments for livestock and wildlife.
CSL-0032	Jess Rodgers	Convert abandoned oil and gas wells to water wells for livestock and wildlife use.
CSL-0033	Archie Bruner	Address domestic agriculture as a benefit to natural land uses.
		Livestock should be tied to domestic agriculture.
		Wildlife is not the foundation of domestic agriculture.
CSL-0038	Jeanne Leske	Be more diligent in monitoring grazing allotments.
CSL-0041	Randy Shepperson	Grazing lands are set aside for stock trail use. These lands would make great landbanks or wildlife habitat if we did not graze after trail use. This would also leave feed on trail for winter trailing.
		Consider a more incentive oriented BLM Plan, for example members working with the BLM should get faster streamlined improvements.
		Those people in the BLM weed and pest Coordinated Resource Management should have a more understood feeding program so they can buy weed free hay without paying the extra 20 to 30 dollars for certified hay.
		RMP should incorporate incentive based management.
		The BLM is currently fencing out stock trail lands for camping spots. This opens the door for all to pull lands out of trail.
CSL-0043	Robert, Rita and Jock Campbell	The RMP should address access to maintain range improvements.
		Use spring developments to aid in achieving management objectives.

Livestock Grazing (continued)

Letter #	Author	Comment
CSL-0044	WGFD	<p>The BLM states that 47 allotments are classified as “I” (Improve Existing Resource Conditions), 65 are classified as “M” (Maintain Existing Resource Conditions, and 416 are classified as “C” (Custodial Management). The number of allotments in the “I” categories is a concern. WGFD recommends implementing management strategies that would improve 15 “I” classified allotments by the year 2010. WGFD also recommends that 20 percent of all grazing allotments have an allotment management plan by the year 2015.</p>
		<p>The BLM states that as of fiscal year 2003, 41 allotments had been evaluated for rangeland health, with 21 of these not meeting one or more of the rangeland health standards. WGFD recommends the RMP include provisions to monitor these specific guidelines, and use the results in active management efforts to improve rangeland conditions.</p>
		<p>The BLM should review the status of lands withdrawn for stock driveway use, and consider creating grassbanks if the area of land would be large enough to facilitate grassbank activities. WGFD recommends that salt and mineral locations within each grazing allotment be placed a minimum of ½ mile away from any water source and/or riparian area.</p>
		<p>WGFD recommends the BLM allocate forage resources for wildlife in order to sustain WGFD big game population objectives and other wildlife populations.</p>
		<p>WGFD recommends four additional 1-acre exclosures within the Table Mountain Wildlife Area, and proportionately manage livestock grazing AUMs to account for the existing and additional exclosures.</p>
		<p>WGFD recommends the BLM coordinate reservoir design and development with WGFD personnel. Furthermore, WGFD requests 50 percent of the reservoirs created meet specifications for fisheries development. To meet fish management concerns, specifications should include a minimum depth of 10 feet, fencing an amount of uplands (headwaters area) adjacent to the reservoir 3 times the size of the reservoir surface acreage (3 upland acres: 1 surface acre ratio), and reservoir designs to include erosion control structures on the downstream outlet, providing roads to access the reservoir, and the emergency spillway being seeded with native grasses.</p>
		<p>Have grassbanks been considered a key activity within the lands and realty program.</p>

Livestock Grazing (continued)

Letter #	Author	Comment
CSL-0044 (continued)	WGFD	WGFD is concerned about the BLM’s flexibility to do range improvements on active allotments. WGFD recommends grassbanks be included as a withdrawal action, and be incorporated into this program. Grassbanks set aside allotments and/or portions of allotments to facilitate vegetative restoration (range improvements) projects on existing active allotments (i.e., prescribed burns, wildland fire restoration, etc.).
CSL-0045	Wyoming Farm Bureau Federation	<p>Too much emphasis has been given to wildlife management and that more of a balance should occur in those areas where there are wildlife and livestock issues.</p> <p>Many livestock producers cannot utilize their leases or permits because of impediments created by Agency rules. An effort needs to be made by the Agency to become livestock friendly so that necessary changes to livestock operations can occur without the Agency being an impediment.</p>

Mineral Resources

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should mandate directional drilling to reduce wildlife habitat impacts.
		The Casper RMP revision should prohibit surface disposal of coal bed methane wastewater.
		The new RMP should forbid industrial development on floodplains.
		The Casper RMP revision should mandate the use of pitless drilling technology.
CSL-0002	Anadarko Petroleum Corp.	Ensure oil and gas resources are represented equally.
		Ensure the rights of private landowners are adequately accounted for.
		Rely on historic figures for determining average acreage disturbance per well location or mile of linear feet.
		Avoid undue delays in permitting oil and gas activities during RMP process.
		Resource monitoring must occur simultaneously with RMP to ensure that sufficient information is available to determine impacts.
		Allow development to occur during revisions of RMP.
		Prepare a “Statement of Adverse Energy Impact” for each alternative analyzed.
		Examine management options that would protect or enhance opportunities to explore for and develop oil and gas resources.
Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access.		

Mineral Resources (continued)

Letter #	Author	Comment
CSL-0002 (continued)	Anadarko Petroleum Corp.	Discussion of potential stipulations regarding non-ESA species should recognize BLM’s lack of authority to enforce the stipulations or studies on private property.
		Allowance for application of new information, technology or economic conditions on lands with unknown, low and moderate oil and gas potential.
		Effects on opportunities to lease explore and develop oil and gas resources resulting from restrictive surface management decisions.
		Limiting stipulations that remain in effect after application of standard lease terms and conditions.
		When surface disturbance is determined in the RMP the “net effect of disturbance” should be used to calculate impacts.
		The effect of surface resource management decisions on future subsurface development opportunities and activities.
		Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts.
		Address socio-economic benefits of oil and gas development activities identifying the cost of administering the mineral program and industry’s financial contributions to Wyoming schools, local, state and federal treasuries.
		Use “net acreage of disturbance” for impact analysis instead of RFD scenario.
		BLM must not make assumptions that industry can directional drill in any situation.
		Consideration of directional drilling as a mitigation tool is inappropriate for planning level analyses.
		The revised RMP must include a program to monitor the effectiveness of stipulations and conditions of approval.
		Specify in the RMP if and how valid existing lease rights could be impacted by the new leasing decisions.
		It is important to recognize that oil and gas exploration and development activities are fully compatible with semi-primitive recreational values and multiple use.
		CSL-0009
CSL-0011	WGFD	Address the foreseeable level of oil and gas development and the probable impacts it has on wildlife and habitat.
		Include cumulative impacts associated with mineral, oil or gas extraction on biological resources.

Mineral Resources (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Address the issue of roads in the floodplain.
		Address mitigation approaches to minimize impacts from mineral, oil, or gas extraction.
		Do not include lands within the boundaries of or adjoining Wildlife Habitat Management Units (Rawhide, Table Mountain, Springer/Bump Sullivan, and Cottonwood) as lands targeted for disposal or mineral leasing.
		WGFD recommends that the RMP address withdrawal of mineral leasing associated with our Habitat Units and the lands adjacent to the Glendo, Gurnsey and Gray Rocks Reservoirs.
CSL-0014	Florenc Williamson	Manage for preservation of public lands (no development).
CSL-0017	Bjork, Lindley, Little, PC	Incorporate the Energy Policy and Conservation Act inventory results into the plan decision.
		Provide realistic opportunities for the development of oil and natural gas on federal lands with only necessary restrictions on surface use.
		Recommend that the reasonably foreseeable development (RFD) scenario analyze sufficient potential development.
CSL-0030	Joe D. Reddick	Identify those areas where mineral resources exist - focusing on coal, oil and gas, and uranium.
		Only gravel all weather roads.
		Facilitate mineral development.
		Coordinate mineral development with other resources.
		Temporary impacts from mineral development is acceptable; restore afterwards threatened and endangered species habitats and other wildlife habitats.
		Do not allow any "pits" for oil and gas production.
		Require appropriate reclamation at the end of projects (oil and gas, etc.) to restoring "vastness."
CSL-0031	G. Eugene Hardy	Address coal bed methane development problems as it relates to water resources and surface disturbances.
CSL-0032	Jess Rodgers	We suggest coalbed methane discharge be piped to the Platte River near Glenrock for replacing water "owed" to Nebraska.
		Convert abandoned oil and gas wells to water wells for livestock and wildlife use.
CSL-0040	Antelope Coal Company	If more stringent standards were to be proposed with the RMP they could restrict future coal mining in Converse County.

Mineral Resources (continued)

Letter #	Author	Comment
CSL-0044	WGFD	WGFD recommends no leasing on WGFD Wildlife Habitat Management Areas, that BLM add a lease stipulation that pad spacing be no less than 80 acres within crucial wildlife habitats, and no more than 10 percent of the cumulative area in crucial habitats be disturbed at any point in time. WGFD recommends no more than 20 percent loss within a vegetative community (habitat type) to development, no surface disturbance within 1/2 mile of existing open water and/or riparian areas, and that directional drilling be encouraged within crucial wildlife habitats.
		WGFD requests the oil and gas program require mitigation of impacts, including off-site mitigation when necessary, and also require rehabilitation of production and adjacent areas to pre-development conditions.
		WGFD recommends the BLM not dispose of public lands where production has occurred simply because they have been developed (i.e., utilities and roads are present).
		WGFD believes the BLM's cumulative effects analysis of development (oil, gas, coal, etc.) has been inadequate in the past in individual environmental assessments (EA) and EISs. Cumulative effects of increased development are having a substantial impact on wildlife populations. The RMP should include a detailed description of the process that will be used for determining cumulative effects of projects during the life of the RMP.
CSL-0045	Wyoming Farm Bureau Federation	In areas where mineral development occurs on split estate lands, the Agency should ensure proper protections have been required of the mineral developer for the surface estate.
		Where reduction in surface values occur some mechanism for mitigation should be considered.

National Historic Trails

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	The existing RMP decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP.
CSL-0003	National Trust for Historic Preservation	Ensure adequate viewshed protection (e.g., buffer zone) for the Oregon/Mormon National Historic Trail within the RMP area.
		To protect National Historic Trails, attach cultural resource restrictions and stipulations for areas open for oil and gas development outside of the buffer zone protection area.
		Conduct a Section 106 review before designating any areas in and around National Historic Trails as open for activities that may allow surface occupancy.

National Historic Trails (continued)

Letter #	Author	Comment
CSL-0003 (continued)	National Trust for Historic Preservation	Attach cultural resource restrictions and stipulations for areas open for oil and gas development outside of the buffer zone protection area.
		Restrict activities by applying NSO restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.
CSL-0030	Joe D. Reddick	Maintain visual and physical integrity of historic trails.
		Be specific about compatible uses for historic trails.
		Protect pristine “ruts”/station sites of historic trails.
		Encourage public use of historic trails by marking routes.
		Provide recreational opportunity related to historic trails.
		Allow stratified use of trails (foot, horse, vehicle).
		Use Bates Hole Livestock drive route for people to ride horses, mountain bike, etc.

Off-Highway Vehicles

Letter #	Author	Comment
CSL-0003	National Trust for Historic Preservation	BLM should comply with Section 106 of the NHPA prior to designating areas for off-road vehicle use.
CSL-0008	Wyoming Department of State Parks and Cultural Resources, Division of State Parks and Historic Sites	Establish a current inventory of roads and trails for OHV use in Wyoming.
		Identify roads to be included in Wyoming ORV program.
		Address appropriate use of existing and future OHV use on public lands.
CSL-0011	WGFD	Evaluate impacts of off-highway vehicle use on wildlife habitat and wildlife’s use of habitat.
		The RMP should specifically address transportation planning that includes off-road use and its probable increase in the future.
CSL-0022	Billie Donovan	Close all-terrain vehicle (ATV) areas periodically.
CSL-0030	Joe D. Reddick	Minimize the number of roads.
		Allow stratified use of historic trails.
		Prohibit off road vehicle use except in designated areas including grazing areas.
		Provide ATV off road areas.
		Set noise limits on ATVs.
CSL-0031	G. Eugene Hardy	Restrict as much as possible the use of motorized vehicles (ATV) in particular, on BLM lands except on established trails and roads.
CSL-0036	Daniel Straka	There are adjacent BLM parcels west of the current boundaries that can be utilized to add an additional 80-240 acres to the area of the Poison Spider Park.

Off-Highway Vehicles (continued)

Letter #	Author	Comment
CSL-0036 (continued)	Daniel Straka	Another parcel of BLM land should be designated for OHV use so the user community has another destination choice.
		Poison Spider ORV Park should be renamed to Poison Spider OHV Park.
		Expand Poison Spider ORV Park.
		Poison Spider Park is over used; safety is an issue.
CSL-0037	Keith Parmely	Is there any other land available for another off-highway vehicle park in addition to Poison Spider?
		Are places like Deer Creek, Esterbrook, Bates Creek and such available for designated trails?
		Will the proceeds from the sales of the OHV stickers be used to establish new trails for OHV use?
		Make land available for off-highway vehicle use.
CSL-0038	Jeanne Leske	Be more diligent in monitoring ORV use.
		Do much more education so people understand what OHV use does to the land.
CSL-0042	J.R. Riggins	Create an additional OHV park similar to the Poison Spider Park within the Casper district. I'm not sure of a site and there may not be one that is suitable. The Poison Spider Park gets more and more use.
		Create a looping ATV trail system in areas that we know are frequented by off-road enthusiasts. Some of these areas are Muddy Mountain/Casper Mountain; Deer Creek; Esterbrook; Glendo.
		It's important to include in the RMP the ability for this district to accommodate the OHV recreational user under the new plan.

Recreation

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	It is important to recognize that oil and gas exploration and development activities are fully compatible with semi-primitive recreational values and multiple use.
CSL-0011	WGFD	The North Platte River provides a quarter million angling days per year. Access to North Platte River remains a critical issue.
		Support the creation of new reservoirs that provides sport fisheries and wildlife habitat and the rehabilitation of existing reservoirs in the 33-mile area. Would like to coordinate with BLM to develop Recreation Management Area Management Plan for the 33-mile area.
CSL-0022	Billie Donovan	Hunt area 25 season is too long and the area is too big to manage.
CSL-0030	Joe D. Reddick	Provide horseback riding opportunities within 1 hour of Casper.
		Require a permit for all signs on public lands and remove the ones on public lands that imply private ownership.

Recreation (continued)

Letter #	Author	Comment
CSL-0030 (continued)	Joe D. Reddick	Provide access points signs and identify property lines so that public land visitors may more effectively use public lands.
		Encourage historical re-enactment.
		Provide recreational opportunity related to historic trails.
		Coordinate with other agencies to create a trail people can ride from Crow Agency, MT to Casper, WY.
		Use Bates Hole Livestock drive route for people to ride horses, mountain bike, etc.
		Continue to emphasize the recreational opportunity of backcountry byways.
		Make Pine Ridge north of Glenrock available to public.
		Prohibit recreation events that are not related to the natural resources (e.g., motorcycle races, endurance horse races, paramilitary events).
		Provide the recreational opportunity of prairie dog shooting.
CSL-0038	Jeanne Leske	Advertise Muddy Mountain as it is very underutilized by the general public.
CSL-0041	Randy Shepperson	The BLM is currently fencing out stock trail lands for camping spots. This opens the door for all to pull lands out of trail.
CSL-0044	WGFD	WGFD recommends evaluation of the North Platte River corridor for additional access site developments, and develop and publish a North Platte River float guide in collaboration with WGFD personnel. WGFD recommends the BLM improve the road on the east side of Pathfinder Reservoir, which would include a crossing on Canyon Creek. The WGFD would like to collaboratively develop a recreational plan for the 33-Mile reservoirs.
		WGFD recommends the BLM coordinate reservoir design and development with WGFD personnel. Furthermore, WGFD requests 50 percent of the reservoirs created meet specifications for fisheries development. To meet fish management concerns, specifications should include a minimum depth of 10 feet, fencing an amount of uplands (headwaters area) adjacent to the reservoir 3 times the size of the reservoir surface acreage (3 upland acres: 1 surface acre ratio), and reservoir designs to include erosion control structures on the downstream outlet, providing roads to access the reservoir, and the emergency spillway being seeded with native grasses.
		WGFD recommends the BLM maintain all public lands adjacent to Rawhide and Table Mountain Wildlife Habitat Management Areas as accessible areas for public use for wildlife recreation activities, and purchase, trade, and/or exchange isolated parcels of public land to augment the existing parcels that border these Wildlife Habitat Management Areas to provide additional recreational opportunities.

Renewable Energy

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	Prepare a “Statement of Adverse Energy Impact” for each alternative analyzed.
CSL-0018	Department of Energy	Department of Energy evaluating the feasibility of constructing a wind farm at Teapot Dome.

Social and Economic Conditions

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts.
		Address socio-economic benefits of oil and gas development activities identifying the cost of administering the mineral program and industry’s financial contributions to Wyoming schools, local, state and federal treasuries.
		Address the costs of stipulations, mitigating measures and restrictive policies impose on industry projects, along with the economic impact to the state of Wyoming and local governments of reduced revenues.
		Address impacts on employment, delays in bringing production on line, and added costs for facilities as a result of BLM management policies as a result of BLM management policies.
CSL-0005	Wyoming Department of Agriculture	Consider the specific socioeconomic effect of all alternatives.
CSL-0011	WGFD	Consider the contribution of fishing and hunting, and estimates of the value of nonconsumptive wildlife uses, to the local and state economy.
		WGFD recommends that the RMP address withdrawal of mineral leasing associated with our Habitat Units and the lands adjacent to the Glendo, Gurnsey and Gray Rocks Reservoirs.
CSL-0013	State of Wyoming, Department of Environmental Quality	Address impacts from fire (smoke, public health, etc.).
CSL-0017	Bjork, Lindley, Little, PC	Recommend that the RFD scenario analyze sufficient potential development.
CSL-0033	Archie Bruner	The fundamentals of nature should be the foundation of land use and economic development to protect air, water, soil, and future life.
CSL-0035	Natrona County Development Department	Address impacts to Natrona County from wind energy, coal bed methane, and carbon dioxide production (such as the Anadarko project) in EIS.

Soil

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The new RMP should forbid industrial development on floodplains.
CSL-0002	Anadarko Petroleum Corp.	Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access.
		Use “net acreage of disturbance” for impact analysis instead of RFD scenario.
		The effect of surface resource management decisions on future subsurface development opportunities and activities.
CSL-0011	WGFD	Address the issue of roads in the floodplain.
		Address mitigation approaches to minimize impacts from mineral, oil, or gas extraction.
CSL-0017	Bjork, Lindley, Little, PC	Provide realistic opportunities for the development of oil and natural gas on federal lands with only necessary restrictions on surface use.
CSL-0031	G. Eugene Hardy	Address coal bed methane development problems as it relates to water resources and surface disturbances.
CSL-0044	WGFD	WGFD recommends no leasing on WGFD Wildlife Habitat Management Areas, that BLM add a lease stipulation that pad spacing be no less than 80 acres within crucial wildlife habitats, and no more than 10 percent of the cumulative area in crucial habitats be disturbed at any point in time. WGFD recommends no more than 20 percent loss within a vegetative community (habitat type) to development, no surface disturbance within ½ mile of existing open water and/or riparian areas, and that directional drilling be encouraged within crucial wildlife habitats.
CSL-0045	Wyoming Farm Bureau Federation	In areas where mineral development occurs on split estate lands, the Agency should ensure proper protections have been required of the mineral developer for the surface estate.
		Where reduction in surface values occur some mechanism for mitigation should be considered.

Special Designations

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The new RMP should survey for, identify, and protect lands of wilderness quality, including but not limited to South Fork of the Powder Roadless Area of Notches Dome.
		The BLM should designate all Prairie Dog complexes larger than 3,000 acres as areas of critical environmental concern with additional protections such as moratorium on recreational shooting.
CSL-0003	National Trust for Historic Preservation	Manage the Cedar Ridge-Badwater Creek area as a Special Management Area (SMA) to ensure adequate protection.

Special Designations (continued)

Letter #	Author	Comment
CSL-0011	WGFD	Designate special management areas for key wildlife habitats.
		Address the possibility and ramifications of nominating the North Platt River as an ACEC.
CSL-0012	Sierra Club	The Sierra Club would like to nominate the North Platte River Corridor area for ACEC designation.
		The Sierra Club would like to nominate the Casper Sand Dunes for ACEC designation.
		The Sierra Club would like to nominate Hole in the Wall/Red Wall for ACEC designation.
		The Sierra Club would like to nominate Muddy Mountain Environmental Education Center for ACEC designation.
		The Sierra Club would like to nominate South Fork of the Powder River Watershed for ACEC designation.
		The Sierra Club would like to nominate Emigrant Trails for ACEC designation.
		The Sierra Club would like to nominate Teapot Dome for ACEC designation.
		The Sierra Club would like to nominate the Pterodactyl Track area for ACEC designation.
		The Sierra Club would like to nominate the Table Mountain area for ACEC designation.
CSL-0030	Joe D. Reddick	Consider Little Medicine Falls for an ACEC.
CSL-0044	WGFD	WGFD recommends the BLM maintain all active Areas of Critical Environmental Concern, SMAs, and Recreation Management Areas.

Special Status Species

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should require adequate protection for sage grouse.
		The Casper RMP revision should require adequate protection for prairie dogs.
		The Casper RMP revision should adequately protect big game crucial ranges.
		The Casper RMP revision should adequately protect raptor nesting habitat.
		The Casper RMP revision should identify and protect mountain plover nesting habitat.
CSL-0004	WGFD	Incorporate Swift Fox conservation measures into RMP.
		Analyze the Swift Fox in EIS.
		Include Swift Fox on BLM state list of sensitive species.
CSL-0011	WGFD	The RMP should consider the sensitivity ratings of various non-game fish in habitat management.
		Designate special management areas for key wildlife habitats.

Special Status Species (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Implement seasonal stipulations to protect key wildlife habitats during important seasons of use.
		Adequate habitat for sensitive species and prevention of future listings of these species. Reference WGFD plan for high priority nongame species for habitat management in key areas.
CSL-0030	Joe D. Reddick	Temporary impacts from mineral development is acceptable; restore afterwards threatened and endangered species habitats and other wildlife habitats.
CSL-0044	WGFD	WGFD recommends the BLM incorporate the following list of sensitive species into the RMP, in addition to the current lists. Native Species Status (NSS) 1: Hornyhead chub, Surgeon chub, Suckermouth minnow, Western Silvery minnow; NSS2: Plains topminnow; NSS3: Black bullhead; Common shiner; Flathead chub; Lake chub; Mountain sucker; Plains minnow; NSS4: Bigmouth shiner, Central stoneroller, Channel catfish, Iowa darter, Longnose sucker, Quillback, River carpsucker, Shorthead redhorse, Stonecat, Boreal chorus frog, Bullfrog, Great Basin spadefoot, Great Plains toad, Leopard frog, Plains spadefoot, Tiger salamander, Woodhouse toad; NSS5: Creek chub; NSS6: Brassy minnow, Fathead minnow, Plains killifish; NSS7: Johnny darter, Longnose dace, Red shiner, Sand shiner, White sucker.
CSL-0045	Wyoming Farm Bureau Federation	The lack of information relative to habitat needs of Threatened, Endangered, Candidate, and Sensitive species have lead the Agency to restrict other economic uses on federal lands in order to “be safe” even if the Agency is unsure. The Agency should be more aggressive in defending the multiple use mandate where habitat needs for listed or candidate and sensitive species is incomplete or lacking.

Transportation and Access

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts.
CSL-0009	Office of State Lands and Investments	Maintain access to lands (state and private) surrounded by BLM.
		Maintain access to state lands for mineral development.
CSL-0011	WGFD	The RMP should specifically address transportation planning that includes off-road use and its probable increase in the future.
		Include and promote actions such as conservation easements and land exchanges to accomplish easy management and access.
		Consider access for anglers and hunters in realty actions.
		The North Platte River provides a quarter million angling days per year. Access to North Platte River remains a critical issue.

Transportation and Access (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Address the effects of roads on wildlife and habitat, particularly in areas of intensive energy development.
		Address road management, particularly in reference to habitat fragmentation, habitat losses, and wildlife disturbance.
		Address the issue of roads in the floodplain.
CSL-0019	Edward J. Birgenheier	Access to and transportation on BLM lands needs to include equestrian use as an acceptable means of transportation and recreation use on all BLM land.
CSL-0022	Billie Donovan	Provide access to BLM land northeast of Casper in Area 25.
		Annoyed with subleasing rules. The State's policy is far more fair.
		Address people trespassing on private land.
CSL-0029	Facilitator Notes	Need access across private land to reach public lands.
CSL-0030	Joe D. Reddick	Minimize the number of roads.
		Require a permit for all signs on public lands and remove the ones on public lands that imply private ownership.
		Only gravel all weather roads.
		Protect historic Fort Fetterman and Little Medicine (Box Elder) Roads while allowing today's uses.
		Provide access points signs and identify property lines so that public land visitors may more effectively use public lands.
CSL-0030	Joe D. Reddick	Use Bates Hole Livestock drive route for people to ride horses, mountain bike, etc.
CSL-0044	WGFD	WGFD requests the BLM target land acquisitions, trades, exchanges, and/or easements that facilitate increased public access to the North Platte River, access to adjacent public lands, grassbank creation, and management of crucial wildlife habitats.
		WGFD recommends evaluation of the North Platte River corridor for additional access site developments, and develop and publish a North Platte River float guide in collaboration with WGFD personnel. WGFD recommends the BLM improve the road on the east side of Pathfinder Reservoir, which would include a crossing on Canyon Creek. The WGFD would like to collaboratively develop a recreational plan for the 33-Mile reservoirs.
		WGFD recommends the BLM maintain all public lands adjacent to Rawhide and Table Mountain Wildlife Habitat Management Areas as accessible areas for public use for wildlife recreation activities, and purchase, trade, and/or exchange isolated parcels of public land to augment the existing parcels that border these Wildlife Habitat Management Areas to provide additional recreational opportunities.

Transportation and Access (continued)

Letter #	Author	Comment
CSD-0044 (continued)	WGFD	WGFD recommends the BLM consider the following: not create any new roads within crucial big game habitats, remove the “necessary tasks” statement (i.e., may go off-road to retrieve big game), maintain all public fishing access area roads a minimum of 2 times per year (includes borrow pits, culverts, crossings, etc.), develop erosion control measures when constructing new roads and/or maintaining existing roads, control non-native, invasive plant species along existing and/or new roads, evaluate existing roads to determine impacts to crucial and important wildlife habitats, close and rehabilitate unsuitable roads, and not permit construction of new roads in floodplains.
CSL-0045	Wyoming Farm Bureau Federation	Management problems have occurred because of misunderstandings by the public as to which lands are public and which are private.

Utility and Communication Corridors

Letter #	Author	Comment
CSL-0030	Joe D. Reddick	Do not allow above ground powerlines greater than 33 kv. Be specific about what are compatible uses for historic trails. Where roads have overlaid trails, don’t disallow utility corridor.

Vegetation

Letter #	Author	Comment
CSL-0011	WGFD	Restore streambank cover to enhance riparian habitat on portions of Buffalo Creek and Trout Creek in 1985 plan. Address declining shrub (mahogany and sagebrush) habitat conditions for wildlife. Include guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage Grouse Conservation Plan (June 2003), Guidelines to Manage Sage Grouse Populations And Their Habitats (Connelly et al. 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (WGFD and Wyoming BLM 2002). In some areas a return to a more historical fire regime may be desirable. This comment pertains to state and management of communities. Maintain and improve key wildlife habitats. This includes improving sagebrush communities. BLM should consult with WGFD for data that would ensure crucial ranges and riparian areas are conserved and that harvest can occur to meet herd objectives. Discuss management of riparian areas in an arid climate. The RMP should especially address Proper Functioning Condition (PFC). Riparian fencing needs to be constructed.

Vegetation (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Address waterfowl nesting cover at Goldeneye Reservoir.
		Management of forest communities to maintain and enhance wildlife habitat is a concern.
		Address adequate management of non-native invasive plant species (e.g., cheatgrass, knapweed, etc.).
		Aspen habitat management will need specific attention.
		Manage forest cover habitat to maintain and enhance habitat and thus wildlife diversity.
		Reclamation following development should require native species of vegetation and consider the needs of fish and wildlife.
CSL-0024	Clyce McColloch	Become more aggressive with biological control of noxious weeds.
CSL-0029	Facilitator Notes	BLM should get more aggressive with biological control of noxious weeds.
		BLM needs to react to prescriptions when window is offered.
		Address prescriptions in mahogany on a landscape base.
CSL-0030	Joe D. Reddick	Use pasture size as a method to provide diversity of landscape.
CSL-0031	G. Eugene Hardy	Better invasive weed control is a must.
CSL-0033	Archie Bruner	Problem plants should be controlled.
CSL-0043	Robert, Rita and Jock Campbell	It is in the best interest to continue the cooperative agreements with relevant weed and pest control districts.
		Adjacent surface owners need to have an interest in any integrated weed management program.
CSL-0044	WGFD	Aspen should be specifically included as a resource that will benefit from the use of fire, and fire should be actively reintroduced back into the aspen community.
		Incorporate a provision into the fire program that will allow for the use of chemicals to prevent, reduce, and/or control the potential that exists for establishment and/or expansion of weed species. This provision should be programmatic in planning processes, including post-management activities following a wildland fire.
		WGFD is concerned about the BLM's flexibility to do range improvements on active allotments. WGFD recommends grassbanks be included as a withdrawal action, and be incorporated into this program. Grassbanks set aside allotments and/or portions of allotments to facilitate vegetative restoration (range improvements) projects on existing active allotments (i.e., prescribed burns, wildland fire restoration, etc.).
		Have grassbanks be considered a key activity within the lands and realty program.

Vegetation (continued)

Letter #	Author	Comment
CSL-0044 (continued)	WGFD	WGFD recommends the BLM manage vegetative communities for Potential Natural Community, which includes a diversity of grasses and forbs and uneven age classes of shrubs, and that management goals be based on a watershed level.
		WGFD recommends the BLM add a section to include aspen management. Aspen inventories should be promoted and on a regular basis, using adequate sampling methodologies. We request the BLM actively manage aspen stands to increase the amount of aspen acres by 80 percent by the year 2010, treat a minimum of 400 acres of aspen and/or potential aspen sites every 3 years, and conduct monitoring strategies to measure success of the treatments.
		WGFD recommends the BLM actively restore vegetation in those areas where past management activities have removed native vegetation (i.e., big sagebrush spray areas, wildfires, disturbed areas, etc.). We recommend the BLM actively manage big sagebrush/grassland communities to move 30 percent of this community toward Potential Natural Community by the year 2010, with an emphasis on the watershed level.
		WGFD requests the BLM change riparian area management designations from PFC to Potential Natural Community. This change in management would remove some, if not all, of the subjectivity that currently occurs within the PFC rating system.
		WGFD requests 95 percent of riparian areas within the Casper Planning Area meet Potential Natural Community by the year 2015. This would require monitoring progress on WGFD priority areas every 3 years in cooperation with WGFD personnel and permittees, using collaboratively developed processes. We recommend utilization levels on preferred herbaceous species not exceed 40 percent during the growing season (hot season), and utilization levels on preferred browse (woody) species not exceed 30 percent leader use annually. Stubble height on upland areas at the end of the grazing season should be a minimum of 6 inches, and greater than 6 inches along streams with critical fisheries habitats and/or easily eroded streambanks. Placement of livestock salt and mineral facilities should be a minimum of ½ mile from a water source and/or riparian area.
		WGFD recommends the BLM change the designation from noxious weed to non-native, invasive plant species. Facilitate management of non-native plants not designated on the state noxious weed list.
CSL-0045	Wyoming Farm Bureau Federation	The BLM should aggressively treat weed infestations with the most cost effective means at their disposal.

Visual Resources

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	BLM should make it clear that visual resource management (VRM) decisions are on an equal footing with other resource considerations.
		Management decisions for the various VRM inventory classification must give consideration to other factors such as recreational user days, mineral development potential, management and presence of other existing resource uses.
CSL-0003	National Trust for Historic Preservation	Provide adequate buffer zones to ensure that surface activities will not adversely impact the viewshed for National Historic Trails.
		Restrict activities by applying NSO restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.
CSL-0011	WGFD	Timber harvest on private lands bordering BLM lands in some areas increases the concern for landscape considerations on BLM lands.
CSL-0015	Mahlon and Joan Frankhauser	Preserve public lands and scenic beauty.
CSL-0030	Joe D. Reddick	Maintain visual and physical integrity of historic trails.
		Develop visual mitigation measures for protecting the feeling of vastness.
		Develop road density standards to protect scenic vastness of area.
		Require appropriate reclamation at the end of projects (oil and gas, etc.) to restoring “vastness.”

Water Resources

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The Casper RMP revision should prohibit surface disposal of coal bed methane wastewater.
		The new RMP should forbid industrial development on floodplains.
CSL-0002	Anadarko Petroleum Corp.	Ensure that all possible methods for handling coal bed methane produced water are addressed.
CSL-0010	State of Wyoming, Department of Environmental Quality	Address discharge and handling of produced water from the oil and gas industry.
CSL-0011	WGFD	Support the creation of new reservoirs and development plan that provides sport fisheries and wildlife habitat and the rehabilitation of existing reservoirs in the 33-mile area.
		Address protection of springs and seeps.
		Suggest protecting springs and seeps through fencing and adjacent water development.
		Address the issue of roads in the floodplain.

Water Resources (continued)

Letter #	Author	Comment
CSL-0011 (continued)	WGFD	Where streams must be crossed, best management practices should be employed to maintain stream equilibrium upstream and downstream of the crossing.
		Restore streambank cover to enhance riparian habitat on portions of Buffalo Creek and Trout Creek in 1985 plan.
CSL-0021	Unknown	Add more water development on public lands to benefit livestock and wildlife.
CSL-0030	Joe D. Reddick	Do not allow anyone to hold livestock water rights except citizens of the United States of America.
CSL-0031	G. Eugene Hardy	Address coal bed methane development problems as it relates to water resources and surface disturbances.
		Encourage more water developments for livestock and wildlife.
CSL-0032	Jess Rodgers	Address coal bed methane discharge water.
		We suggest coal bed methane discharge be piped to the Platte River near Glenrock for replacing water “owed” to Nebraska.
		Convert abandoned wells to water wells to support greater number of AUMs and wildlife.
CSL-0043	Robert, Rita and Jock Campbell	Spring developments with watering facility such as storage tanks would aid in more available water for livestock and wildlife and would help achieve management objectives.
CSL-0044	WGFD	WGFD requests the BLM evaluate each reservoir for multiple uses, including fisheries, waterfowl, wildlife, and livestock grazing management. WGFD requests the design of these reservoirs be such that the upper areas provide shallow water habitat (maximum of 2 feet deep), which includes emergent vegetation for waterfowl habitat.
CSL-0045	Wyoming Farm Bureau Federation	Inventories and assessments of water bodies on BLM land should occur in accordance with state of Wyoming criteria and closely coordinated with the state of Wyoming.

RMP Revision Process

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The BLM should consult with the tribes indigenous to the Casper Field Office.
CSL-0003	National Trust for Historic Preservation	Outline cultural issues and potential areas of interest at outset of RMP process.
		Engage in consultation with Native Americans early in planning process to address concerns and identify culturally significant areas.
		Follow mandates in BLM’s CRMP manual.
CSL-0005	Wyoming Department of Agriculture	Coordinate with ranchers.
		Work cooperatively with public and interested stakeholders.

RMP Revision Process (continued)

Letter #	Author	Comment
CSL-0008	Wyoming Department of State Parks and Cultural Resources, Division of State Parks and Historic Sites	Mitigation measures need to be included in RMP EIS.
CSL-0011	WGFD	BLM should consult with WGFD for data that would ensure crucial ranges and riparian areas are conserved and that harvest can occur to meet herd objectives. With increasing intensity of land uses (energy development, recreation) the need for increased cumulative analysis of effects at the local and regional scale is a concern.
CSL-0041	Randy Shepperson	Consider a more incentive oriented BLM Plan, for example members working with the BLM should get faster streamlined improvements.

Mitigation Measures

Letter #	Author	Comment
CSL-0002	Anadarko Petroleum Corp.	Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access. The existing RMP decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP. Consideration of directional drilling as a mitigation tool is inappropriate for planning level analyses.
CSL-0011	WGFD	Address mitigation approaches to minimize impacts from mineral, oil, or gas extraction. Riparian fencing needs to be constructed. Suggest protecting springs and seeps through fencing and adjacent water development. Where streams must be crossed, best management practices should be employed to maintain stream equilibrium upstream and downstream of the crossing. The RMP should mitigate for development. Reclamation following development should require native species of vegetation and consider the needs of fish and wildlife.
CSL-0032	Jess Rodgers	We suggest coal bed methane discharge be piped to the Platte River near Glenrock for replacing water “owed” to Nebraska. Convert abandoned wells to water wells to support greater number of AUMs and wildlife.

Mitigation Measures (continued)

Letter #	Author	Comment
CSL-0044	WGFD	WGFD requests the oil and gas program require mitigation of impacts, including off-site mitigation when necessary, and also require rehabilitation of production and adjacent areas to pre-development conditions.
CSL-0045	Wyoming Farm Bureau Federation	There are several management options which could help mitigate these misunderstandings. In areas where land ownership can be adjusted, the BLM needs to aggressively pursue these options if there is a willingness by the landowner to trade or purchase BLM lands.
		Where reduction in surface values occur some mechanism for mitigation should be considered.

Cumulative Impacts

Letter #	Author	Comment
CSL-0001	Biodiversity Conservation Alliance	The new RMP should consider the forthcoming Heart of the West Wildland Network Design and be compatible with its recommendations.
CSL-0002	Anadarko Petroleum Corp.	The effect of surface resource management decisions on future subsurface development opportunities and activities should be considered.
CSL-0005	Wyoming Department of Agriculture	Discuss the cumulative impacts to ranchers.
CSL-0011	WGFD	Include cumulative impacts associated with mineral, oil or gas extraction on biological resources.
		Include guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage Grouse Conservation Plan (June 2003), Guidelines to Manage Sage Grouse Populations And Their Habitats (Connelly et al. 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (WGFD and Wyoming BLM 2002).
		With increasing intensity of land uses (energy development, recreation) the need for increased cumulative analysis of effects at the local and regional scale is a concern.
CSL-0018	Department of Energy	Department of Energy is evaluating the feasibility of constructing a wind farm at Teapot Dome.
CSL-0044	WGFD	WGFD believes the BLM's cumulative effects analysis of development (oil, gas, coal, etc.) has been inadequate in the past in individual EAs and EISs. Cumulative effects of increased development are having a substantial impact on wildlife populations. The RMP should include a detailed description of the process that will be used for determining cumulative effects of projects during the life of the RMP.

Regulatory Compliance

Letter #	Author	Comment
CSL-0003	National Trust for Historic Preservation	Integrate President Bush's "Preserve America" stewardship mandates into the RMP.
		Integrate Section 110 of the NHPA into the RMP process by identifying, evaluating, and nominating properties to the National Register.
		Adequately integrate FLPMA's multiple use mandates into RMP process.
		BLM should comply with Section 106 of the NHPA prior to designating areas for off-road vehicle use.
		Conduct a Section 106 review before designating any areas in and around National Historic Trails as open for activities that may allow surface occupancy.
CSL-0005	Wyoming Department of Agriculture	Follow all regulations and guidelines.
CSL-0007	Wyoming Department of State Parks and Cultural Resources, State Historic Preservation Office	Follow regulatory guidelines for cultural resources.
CSL-0013	State of Wyoming, Department of Environmental Quality	Review air quality regulations relative to their management regulations.
CSL-0031	G. Eugene Hardy	It is a mistake to make the public aware of items or sites of interest (archeological/historic/cultural/etc.).

Valid Existing Management to be Carried Forward Comments

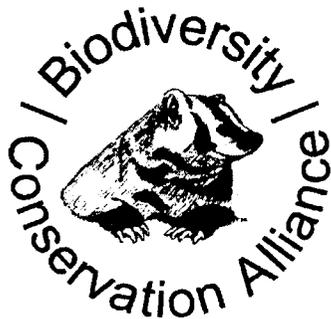
Letter #	Author	Comment
CSL-0011	WGFD	Several good initiatives were presented in the previous RMP that we would like to see continued in the upcoming revision, and an increased implementation of them.
CSL-0026	Joe Johnson	Likes things just like they are.
CSL-0027	Bernard McGuire, Jr.	The BLM is running the public lands as well as it can be. Would like to see it remain the same.
CSL-0028	Tom Preuit	Wants his grazing lease to stay the way it is now.
CSL-0030	Joe D. Reddick	Continue to emphasize the recreational opportunity of backcountry byways.

APPENDIX B
COMPLETE SET OF SCOPING LETTERS

Casper Field Office RMP Revision Scoping Report
Comment Letter Index – By Author

Last Name	First Name	Organization	Comment Letter Number	Format
Baumann	Patrick J.	Kennecott Energy	CSL-0040	Letter
Birgenheier	Edward J.	Pathfinder Backcountry Horsemen of America	CSL-0019	Comment form
Bonds	James	N/A	CSL-0016	E-mail
Boomgaarden	Lynne	Office of State Lands and Investments	CSL-0009	Letter
Bruner	Archie	N/A	CSL-0033	Letter
Campbell	Robert, Rita and Jock	N/A	CSL-0043	Comment form
Clayson	Tom	Anadarko Petroleum Corporation	CSL-0002	Letter
Corra	John V.	The State of Wyoming Department of Environmental Quality	CSL-0010	Letter
Donovan	Billie	N/A	CSL-0022	Comment form
Etchepare	John	Wyoming Department of Agriculture	CSL-0005	Letter
Frankhauser	Mahlon and Joan	N/A	CSL-0015	E-mail
Grenier	Martin	Wyoming Game and Fish Department	CSL-0004	Letter
Hamilton	Ken	Wyoming Farm Bureau Federation	CSL-0045	Letter
Hardy	G. Eugene	Hardy Ranch	CSL-0031	Comment form
Hines	James	N/A	CSL-0034	E-mail
Johnson	Joe	N/A	CSL-0026	Comment form
Koepsel	Kirk	Sierra Club	CSL-0012	Letter
Kozlowski	Julie	The State of Wyoming Office of the Governor	CSL-0006	Letter
Leske	Jeanne	N/A	CSL-0038	Comment form
Lindley	Laura	Bjork, Lindley, Little, PC	CSL-0017	Letter
Markus	Michael J.	Natrona County Development Department	CSL-0035	Computer Comment Form
McCulloch	Clyce	JY Ranch	CSL-0024	Comment form
McCulloch	Clyce	JY Ranch	CSL-0025	Comment form
McCulloch	Clyce	JY Ranch	CSL-0029	Website
McGuire, Jr.	Bernard R.	N/A	CSL-0027	Comment form
Molvar	Erik	Biodiversity Conservation Alliance	CSL-0001	Letter
Parmely	Keith	Casper Dirt Riders	CSL-0037	Website

Last Name	First Name	Organization	Comment Letter Number	Format
Potter	Darla J.	The State of Wyoming Department of Environmental Quality	CSL-0013	Letter
Preuit	Tom	N/A	CSL-0028	Comment form
Raap	Kim	Wyoming Department of State Parks and Cultural Resources, Division of State Parks and Historic Sites	CSL-0008	Letter
Reddick	Joe D.	N/A	CSL-0030	Letter
Riggins	J.R.	Motorized Rec. Council of Wyoming / Casper Dirt Riders	CSL-0042	Comment form
Rodgers	Jess	Converse County Conservation District	CSL-0032	Comment form
Shepperson	Randy	KS Ranch	CSL-0041	Comment form
Small	Kenneth	Springfield Ranch	CSL-0039	Comment form
Smith	Michael	National Trust for Historic Preservation	CSL-0003	Letter
Straka	Daniel	Casper Dirt Riders, Wyoming Motorcycle Trails Association	CSL-0020	Comment form
Straka	Daniel	Wyoming Motorcycle Trails Association and Casper Dirt Riders	CSL-0036	Website
Taylor	Mike	Department of Energy	CSL-0018	Comment form
Unknown	Unknown	N/A	CSL-0021	Comment form
Unknown	Unknown	N/A	CSL-0023	Website
Wichers	Bill	Wyoming Game and Fish Department	CSL-0011	Letter
Wichers	Bill	Wyoming Game and Fish Department	CSL-0044	Letter
Williamson	Florenc L.	N/A	CSL-0014	E-mail
Wolf	Judy K.	Wyoming Department of State Parks and Cultural Resources, State Historic Preservation Office	CSL-0007	Letter



Working to Protect Native Species and Their Habitats 12 31 10: 57

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August 8, 2003

Casper Field Office, BLM
2987 Prospector Drive
Casper, WY 82604

Re: Scoping Comments on the Casper Resource Management Plan Revision

Dear Planning Team:

The following are the comments of Biodiversity Conservation Alliance (BCA) on the proposed revision of the Casper RMP. Please address the issues raised in these comments in the forthcoming DEIS for the plan revision.

1. The new Casper RMP should require adequate protection for sage grouse.

Current BLM protections and mitigations for sage grouse are woefully inadequate. Currently, the Wyoming BLM typically requires NSO stipulations for the first $\frac{1}{4}$ mile radius of a sage grouse lek, and mere timing limitations from $\frac{1}{4}$ mile to two miles of the lek. Most sage grouse typically nest within 2 miles of a lek site, and scientists agree that the area within two miles of the lek site should be given full protection from disturbances. This includes road-building, oil and gas drilling, and vegetation manipulation projects such as sagebrush clearing and burning. If disturbance-related activities are allowed to occur at all within the two-mile radius of a lek site, the grouse will return the following spring to a lek site with heavily impacted nesting habitat, and likely human activity on roads and well sites well within the 2-mile radius. This will cause decreased reproduction and possibly lek abandonment. Given that the sage grouse has been petitioned for listing under the Endangered Species Act, and this listing will now become even likelier due to the impacts of West Nile Virus on sage grouse populations westwide, the absolute minimum measure that should be enacted is a NSO (and no vegetation treatments) within 2 miles of a sage grouse lek.

2. The new Casper RMP should require adequate protection for prairie dogs.

Current BLM protective measures for prairie dogs seem essentially nonexistent. Both the white-tailed and black-tailed prairie dogs have been petitioned for listing under the Endangered Species Act, and also are keystone species that is vital to the viability of other

rare and declining species such as ferruginous hawk, swift fox, black-footed ferret, mountain plover, and burrowing owl. The new RMP should require NSO stipulations for all prairie dog colonies with a ½ mile buffer to prevent increased raptor predation that results from the construction of roosting structures such as condensate tanks. Prairie dog colonies should also be avoidance areas for power line rights-of-way. In addition, the BLM should make a current survey of prairie dog colonies throughout the Field Office, and prairie dog complexes larger than 3,000 acres should be designated as Areas of Critical Environmental Concern, with additional protections such as a moratorium on recreational shooting.

3. The Casper RMP should adequately protect big game crucial ranges.

The BLM has heretofore been woefully remiss in protection big game crucial winter, crucial winter yearlong, severe winter relief, and calving ranges. Seasonal stipulations have failed miserably to provide protection, as they have allowed roads and well sites to be built inside crucial winter ranges, and these seasonal stipulations are waived at the operator's convenience, nullifying the nominal protection that is afforded in the first place. The result is that roads and well sites are built inside big game crucial ranges, with the result that vehicular traffic and increased human activity occur inside these sensitive habitats during the crucial season. This is an unacceptable state of affairs. Instead, the new RMP should require NSO stipulations to be placed on all big game crucial ranges, with no opportunity for waiver.

4. The Casper RMP should adequately protect raptor nesting habitat.

Current BLM mitigation measures and protective stipulations regarding raptor nest sites are inadequate. These measures typically require No Surface Occupancy only within a few hundred feet of a raptor nest. The best available science suggests that 1/4-mile buffers are the minimum protection that can be afforded to prevent nest abandonment, and larger, 1-mile buffers are needed to account for particularly sensitive species like ferruginous hawks and for drought years and other periods of prey scarcity, when raptors range more widely and are more susceptible to disturbance. It is important to note that a disturbance that causes nesting raptors to abandon the nest for as little as 10 or 20 minutes can lead to the fatal cooling or overheating of eggs or the fatal dehydration or exposure of chicks, leading to the failure of that year's reproductive effort and consequently impacting the local raptor population. Bald eagle winter roost sites must also be identified and granted similar protections.

5. The Casper RMP should identify and protect big game migration corridors.

The Wyoming Game and Fish Department has identified migration routes for several big game species. These migration corridors should be protected from industrialization, lest habitat fragmentation or increased levels of human disturbance lead to interruption of annual migration patterns or even extirpation of migratory populations. An important lesson

from the Red Desert's Steamboat Mountain elk herd is that once a migratory population is lost, natural migration patterns are not reestablished by the reintroduction of that same species to the vacated area. In the case of the Steamboat Mountain herd, the native herd migrated between summer ranges in the Wind River Range and winter habitats in the Red Desert; following extirpation in the 1930s, the reintroduced population failed to take up the original migratory patterns of the native herd.

6. The Casper RMP should identify and protect mountain plover nesting habitat.

Mountain plovers are about to be listed as Threatened under the ESA. The Casper RMP should include a comprehensive survey of the field office for mountain plover, conducted during the short window in late spring when the birds are visible and according to scientifically accepted protocols. Nesting areas that are identified should be protected with No Surface Occupancy stipulations, with a minimum ½ mile NSO buffer.

7. The Casper RMP should protect populations of rare native warmwater fishes.

We are concerned about the potential impacts of water withdrawals (both from oil and gas projects and livestock operations), dams and diversions (small and large), coalbed methane wastewater discharge, and siltation from road and wellpad construction on BLM Sensitive fishes such as the hornyhead chub. Actions that interrupt the flow regime, temperature regime, chemical signature, or migration routes for these fishes must be prohibited through the new RMP.

8. The Casper RMP should minimize fences on public lands, remove unpermitted fences, and bring all fences into compliance with WGFD standards.

Fences emplaced to control livestock movements also interfere with the migrations and dispersal of wildlife, particularly pronghorns. WGFD require that all fences should have a bottom strand at least 16" above the ground and of smooth wire. Wire mesh fences of the type formerly used to control sheep should be eliminated. Experience with winter throughout central and southwestern Wyoming in the early 1970s demonstrates that fences can be a barrier to pronghorns and result in major losses.

. The Casper RMP should institute a natural fire policy in place of controlled burns.

Precious little is known about the frequency and severity of natural wildfires in the shortgrass prairies and sagebrush steppes of Wyoming. As a result, the BLM as a land manager is in a poor position to know how to manage a large-scale program of sagebrush manipulation and controlled burning. Thus, the appropriate approach is to let natural wildfires burn in order to reestablish the natural mosaic of sagebrush stands. This should be codified as a requirement in the new RMP.

12. The Casper RMP should mandate directional drilling to reduce habitat impacts.

Directional drilling, using clustering of wells on a few sites and drilling outward, should be required for all full-field oil, gas, and CBM development projects under the new RMP. Doing so fulfills the operators' desire to extract resources while maintaining other multiple uses of the land to the greatest extent possible under full-field development, and also prevents undue degradation of lands and resources that occurs through the unnecessarily heavy impacts of vertical drilling programs. Please see the attached report, which details the feasibility of directional drilling both from an economic and technical standpoint; we incorporate this report into our comments by reference. Significantly, Wyoming experience also supports directional drilling:

“There is, however, a benefit from pad drilling, and that is that the wellheads are all concentrated in a small area. That, as we mentioned in our comments, is very positive for the environment. It significantly reduces our footprint. But it also consolidates the wells so we can use centralized facilities, which will lower capital costs. And we think we'll gain back some of the slippage in cost for directional drilling by having consolidated service facilities. In fact, we're going to look at centralizing facilities to minimize the visual impact as well as the operating impact of having well-by-well production facilities out there. That should further reduce our operating cost. **And we believe that, overall, we should see net savings from pad drilling by the time we implement fully directional drilling plus the consolidation of service facilities.**”

-Chuck Stanley, Questar, regarding directional drilling experience in the Jonah Field. Questar First-Quarter 2003 Teleconference Question and Answer Session, www.questar.com/news/teleconference/teleQA503.htm. Emphasis added.

Thus, there is no excuse for BLM to fail to mandate this lower-impact technology for drilling in the Casper RMP.

13. The Casper RMP should prohibit surface disposal of CBM wastewater.

Coalbed methane wastewater is typified by high salinity and sodicity, as well as high concentrations of toxic heavy metals. This alone should be sufficient to preclude its surface disposal, which allows the wastewater to move into near-surface aquifers and surface streams and wetlands, where it could outright poison aquatic life and/or alter with the chemical signature of the waterway and thus impair the migrations of native fishes. But furthermore, even if the wastewater were to be purified, the massive influx of water, potential changes in temperature gradients, and changes to natural flow patterns would have substantial and lasting impacts on fish populations by altering the cues for migration

and spawning to the point that reproduction could be jeopardized. For these reasons coalbed methane wastewater should either be reinjected into the ground in manner that allows for future retrieval, or treated and shunted into municipal water systems for domestic use. These measures should be required in the new RMP.

14. The Casper RMP should mandate the use of pitless drilling technology.

Pitless drilling entails the recycling and ultimate reinjection of drilling fluids through a closed-loop system, preventing the need for reserve pits filled with toxic compound, a possible deathtrap for livestock and wildlife. Its use also reduces the size needed for the drilling pad, thus reducing the wellpad footprint. This technology actually costs less to implement than the cost of digging, lining, and disposing of a reserve pit, and thus there is no reason not to mandate pitless drilling technology for all oil and gas projects. The new RMP should require the use of this technology unless its environmental impacts in a specific case are greater than those of a reserve pit. See attached report for details.

15. The new RMP should consider the forthcoming Heart of the West Wildland Network Design and be compatible with its recommendations.

The Wildlands Project is in the final stages of developing the Heart of the West Wildlands Network Design, a core-corridor model for maintaining wildlife habitat and important linkages for the entire Wyoming Basins Ecoregion. We incorporate the final document into these comments by reference; it is slated for release this fall. The BLM should carefully consider this plan, and implement its zoning recommendations to achieve an ecologically sound land management strategy on a regional scale.

16. The BLM should consult with the tribes indigenous to the Casper Field Office.

The BLM should consult with, and engage as cooperating agencies, the Native American tribes indigenous to the area, including but not limited to the Shoshone, Arapaho, Northern Cheyenne and Lakota peoples. Special protection should be granted to Native American Respected Places and Sacred Sites. It is important to note that merely notifying the tribes does not satisfy the BLM's legal requirements; the tribes must be actively engaged to achieve a meaningful dialogue.

17. The new RMP should forbid industrial development on floodplains.

Pursuant to Executive Orders currently in force, the new RMP must preclude construction activities on 25-year and 100-year floodplains, both for permanent streams and intermittent draws.

18. The new RMP should survey for, identify, and protect lands of wilderness quality.

The BLM should survey the Casper Field Office for lands that meet wilderness criteria, including but not limited to the South Fork of the Powder roadless area northeast of Notches Dome identified in the book, Wild Wyoming (see attached excerpt). These lands should be withdrawn from mineral leasing and other surface-disturbing activities through the new RMP.

Conclusion

We urge the BLM to draft a new RMP that maintains the wide-open spaces, visual resources, and wildlife habitats managed by the Casper Field Office. On lands where oil and gas development is appropriate, these development activities should be done right, with only secondary regard to the timeliness and profitability of doing so. All activities permitted under the new RMP should be approached within the context of maintaining or improving wildlife, water quality, recreation opportunities, visual resources, and wilderness qualities, in order to fulfill BLM's multiple-use mandate. We urge the agency to strike a balance between competing uses, rather than elevating oil and gas development to a preminent status and ignoring other resources that are valuable to the public over the long term.

Thanks you for considering these comments, and please keep us informed of any future documentation relating to this RMP revision.

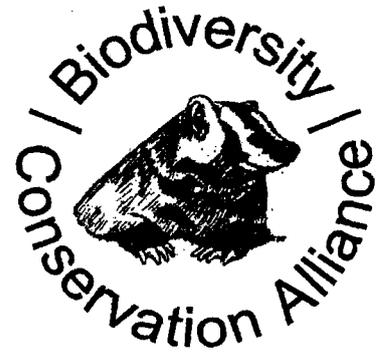
Sincerely yours,



Erik Molvar

Attachments: Drilling Smarter report, Wild Wyoming excerpt

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Drilling Smarter:

Using Directional Drilling
to Reduce Oil and Gas Impacts in the Intermountain West

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FOREWORD

This study was compiled by researching technical and trade publications produced by the oil and gas industry. Conclusions and recommendations of this report rely heavily on the findings **and** conclusions of the industry experts who authored these studies. We recognize that success stories are more likely to be published than failures, and as a result great pains have been taken to present both the positive aspects **and** drawbacks of directional drilling, **and** to present data that reflects industry-wide averages (incorporating both successful and failed projects) wherever these data were available. As a result, a higher proportion of studies outlining the negative aspects of directional drilling are presented here **than** are found in the petroleum engineering literature, which almost universally provides glowing endorsements of the technical capabilities and economic feasibility of directional drilling. We chose this conservative approach in **order** to **avoid** overstating **the** capabilities of these technologies.

Report issued February 18, 2003

Cite this report as follows:

Molvar, E.M. 2003. Drilling smarter: Using directional drilling to reduce oil and gas impacts in the Intermountain West. Laramie, WY: Biodiversity Conservation Alliance, 32 pp.

Drilling Smarter: Using Directional Drilling to Reduce Oil and Gas Impacts in the Intermountain West

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EXECUTIVE SUMMARY

Current practices in oil and gas exploration and development have produced massive environmental impacts across broad stretches of the Intermountain West. However, over the past several decades, the oil and gas industry has developed innovative technologies **that** can extract energy resources from the ground while reducing the impacts of that drilling on the natural environment. **In** particular, directional drilling technology has the potential to offer a less damaging alternative to conventional drilling methods in the Rocky Mountain West. Using directional drilling, energy firms can tap deposits of oil and gas at almost **any** depth from drilling sites up to 6½ miles away **from** the deposit.

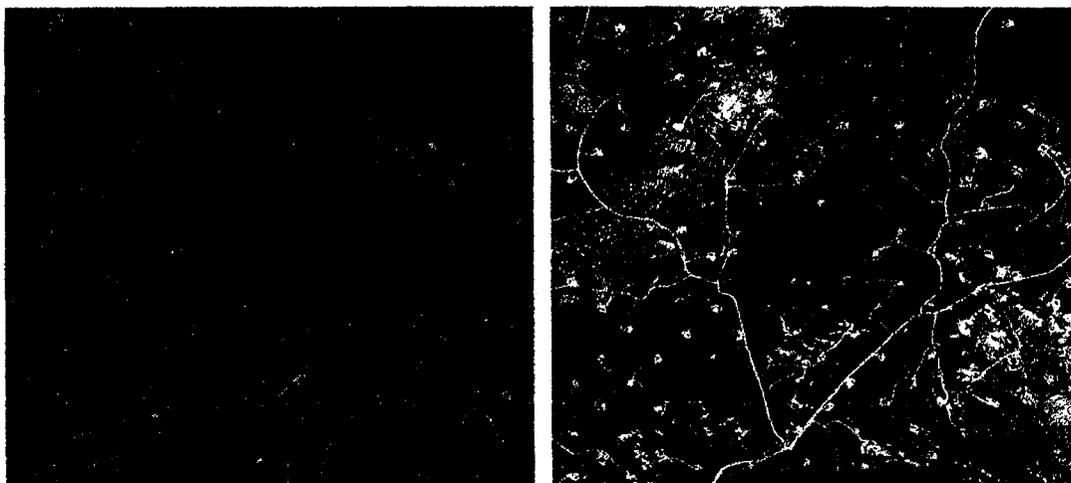
Directional drilling has proven technically and economically feasible in a broad range of geologic settings, including tight gas, heavy oil, and coalbed methane. This method is proven to substantially increase producible reserves of oil **and** gas. Because **the** increased productivity of directional drilling compensates for additional costs, directional drilling is often more profitable than vertical drilling.

The Bush Administration's National Energy Policy calls for the use of directional drilling technology to reduce the environmental **impacts** of oil **and** gas exploration and development. However, federal agencies rarely even consider directional drilling **as an** alternative for oil and gas projects involving federal lands **and** minerals in the Intermountain West, **and** the oil **and** gas industry frequently balks when asked to use these technologies. On lands where oil **and** **gas** development is deemed appropriate **and** compatible with other uses **in** the Rocky Mountain West, federal agencies should consider whether they **can** reduce the damages **from** drilling activities through the implementation of directional drilling technologies, and if so, require their use.

Directional drilling does not prevent all environmental impacts of oil and gas exploration and development, and clustering operations lead to an intensification of impacts in the drilling area even while reducing the overall surface area across which those impacts **occur**. In addition, use of directional drilling technology does not address the numerous other impacts associated with oil **and** **gas** development and production, such **as** chemical spills and air pollution. **As** a result, some lands — including national wildlife refuges, parks, wilderness **areas and** monuments; roadless and wilderness-quality lands; and other sensitive lands — contain resources incompatible with oil **and** **gas** development and should remain withdrawn from all types of drilling. And appropriate buffers must be established to protect these lands from impacts in adjacent areas. Additionally, other lands such as important wildlife habitat, scenic landscapes, wetlands and **other** sensitive lands must be protected from the surface *impacts* of energy development.

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Images provided by SkyTruth and the Upper Green River Valley Coalition

Recent full-field development in western Wyoming's Jonah Field as shown by aerial images. The photograph at left shows the landscape in 1994, before full-field development. By 1999 (at right), the landscape had become fragmented by roads and well pads.

AN ENVIRONMENTAL IMPERATIVE

A century of oil and gas development has left a heavy **mark** on many of our nation's public and private lands, particularly in the West. Oil and gas fields have become a vast spiderweb of pipelines and access roads, pockmarked with well pads, which fragment the landscape. Compressors, trucks, and pumpjacks generate noise, pollutants, and dust. Water and mud "produced" during the course of oil and gas development threatens local surface- and ground-water supplies used for residential and agricultural needs. Indeed, full-field development for oil and gas has often converted pristine wildlands and pastoral rural areas into industrial landscapes. In its conventional form, oil and gas production destroys the wild character of primitive areas, severely diminishes the recreational value of the landscape, creates long-term scarring across scenic viewsheds, and degrades or destroys habitat for native wildlife and fishes. As such, conventional oil and gas development is fundamentally incompatible with most other land uses, both public and private, particularly where dense well spacing is allowed.

The drilling activities associated with oil and gas production are just some of the sources of environmental damage associated with the production of oil and gas. While all of the potential impacts from oil and gas exploration, development and transportation must be considered before this activity is approved on federal lands,

it is particularly important to consider alternatives to traditional drilling. The following sections describe a few examples of the impacts of drilling.

Oil and Gas Development Fragments Habitat

The sprawl of oil and gas fields can cause severe habitat fragmentation through the proliferation of roads, pipelines, and well pads across the landscape. The effects of forest fragmentation on bird densities are well-documented (e.g., Hansen and Rotelta 2000). But fragmentation also impacts sagebrush bird species (Knick and Rotenberry 1995). In sagebrush habitats, major songbird declines have been found in areas with heavy oil and gas development (Ingelfinger 2001). Lyon (2000) found that the construction of roads and wells within 2 miles of sage grouse **stutting** grounds had negative impacts on nesting. On a population scale, drilling has severe short-term impacts on sage grouse, while associated roads, pumping stations, and associated facilities have permanent negative impacts (Braun 1998, Braun et al. in press). Thus, oil and gas drilling can have **serious** effects even on relatively small, mobile wildlife.

Wells and Roads Displace Wildlife

Oil and gas development can also have a major impact on big game animals. Powell and Lindsey (2001) found that elk avoid lands within 1.5 kilometers of oilfield roads and well sites in

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the sagebrush steppes of Wyoming. In mountainous habitats, the construction of a small number of oil or gas wells has caused elk to abandon substantial portions of their traditional winter range (Johnson and Wollrab 1987, Van Dyke and Klein 1996). Drilling in the mountains of western Wyoming displaced elk from their traditional calving range (Johnson and Lockman 1979, Johnson and Wollrab 1987). Migration corridors may in some cases be equally important to large mammals and are susceptible to impacts from oil and gas development (Sawyer et al., in press). A study by Nelleman and Cameron (1998) demonstrated that even where directional drilling is widespread, oil and gas development of the Kuparuk Field of Alaska's North Slope caused caribou of the Central Arctic Herd to abandon their traditional calving grounds and displaced concentrations of calving animals to areas with poorer habitat quality. Because winter ranges and calving areas are crucial to the survival of big game herds, these studies demonstrated the need to completely protect these sensitive habitats from surface development by the oil and gas industry.

A POLICY IMPERATIVE

President George W. Bush made the implementation of lower-impact directional drilling technologies the cornerstone of his energy policy. The President's National Energy Policy contains a section titled, "21st Century Technology: The Key to Environmental Protection and New Energy Production," which states:

Producing oil and gas from geologically challenging areas while protecting the environment is important to Americans and to the future of our nation's energy security. New technology and management techniques will allow for sophisticated energy production as well as enhanced environmental protection... Smaller, lighter drilling rigs coupled with advances in directional and extended-reach drilling significantly increase protection of the environment... Modular drilling rigs, 'slimhole' drilling, directional drilling, and other advances enable:

- production of oil and gas with increased protection to wetlands and other sensitive environments;

Other examples of advanced technology include: [...]

- highly sophisticated directional drilling that enables wells to be drilled long horizontal distances from the drilling site[.]”

National Energy Policy, May 2001, "Reliable, Affordable, and Environmentally Sound Energy for America's Future: Report of the National Energy Policy Development Group," p. 5.5.

Likewise, the Secretary of the Interior, who is responsible for implementing much of the National Energy Policy, has emphasized the need to begin utilizing directional drilling technology:

We must also harness 21st Century technology to help our environment. Where we once needed scores of wells to tap underground reserves, today in some areas we can use one hole on the surface to drill for oil in a circle extending seven miles. We can use the resources below ground while we preserve the landscape and habitat above.

Presentation of Gale Norton, Secretary of Interior, to the National Newspaper Association (Washington, DC, March 23, 2001). These policy statements represent an unequivocal commitment on the part of the administration to implement less environmentally damaging directional drilling technologies.

A POLICY FAILURE BY THE BUSH ADMINISTRATION

But despite these commitments, the Bush Administration has failed to live up to its promises to implement technologies to reduce the impacts of oil and gas exploration and drilling on the environment. In fact, rather than pushing for more directional drilling, under the Bush Administration, the Interior Department's Bureau of Land Management (BLM) has actively avoided any effort to consider directional drilling as an alternative when energy production is being considered on public lands in the Intermountain West (see Table 3).

For example, federal agencies under the Bush Administration failed to even consider directional drilling as an alternative for at least, six western projects where the public specifically demanded the use of these techniques. The environmental consequences from ignoring the opportunity to reduce damages to these surface lands from drilling are staggering.

In western Wyoming's Vermillion Basin, the BLM refused to analyze a directional alternative to protect roadless lands even after a court order

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Table I. Approval documents for oil and gas developments that have been issued since George W. Bush became President in 2001.

Project	State	Document	Date(s)	Directional Requested?	Directional Analyzed?	Notes
Porcupine Tuit	WY	EA	8/02	Yes	No	Thunder Basin N.G. coalbed methane
Atlantic Rim (3Pods)	WY	DRs	12/01-8/02	Yes	No	winter range, grouse leks coalbed methane
Hanna Draw	WY	DR	6/02	Yes	No	coalbed methane
Vermillion Basin	WY	DR	8/02	Yes	No	in proposed wilderness
WY Powder River Basin	WY	EIS	1/02	Yes	No	coalbed methane 50,000 wells
Southern Ute	CO	EIS	8/02	Yes	No	700 coalbed methane wells
Raton Basin	CO/NM	EA	9/01	No	No	206 wells
Macum/Klabzuba	MT	EA	5/02	No	No	inside Missouri Breaks NM
Huber Six Well	CO	DR	4/02	No	No	6 wells
Pinon Mesa	NM	DR	4/02	No	No	high-profile recreation area
MT Powder River Basin	MT	EIS	2/02	Yes	Yes ²	coalbed methane 30,000 wells
Otero Mesa	NM	EIS	10/00	Yes	Yes ³	includes sensitive wildlife habitats
Farmington	NM	EIS	6/02	No	Yes ⁴	10,000 wells

EA=Environmental Assessment (analyzing alternatives); EIS = Environmental Impact Statement (analyzing alternatives); DR = Decision Record (final decision).

1. Despite court ruling requiring the agency to take a harder look at directional drilling.
2. Not selected as the Proposed Action.
3. Proposed alternative under the Clinton administration, but withdrawn from proposed alternative status by the Bush administration.
4. Only 70 of 10,000 wells to be clustered on single well pads.

compelled them to undertake a detailed analysis of directional drilling. Big game habitat, declining sage grouse and prairie dog populations, and important recreational lands are all at risk.

In northern Wyoming's Powder River Basin, the Administration proposed to approve 50,000 new coalbed methane wells, without considering directional drilling as a means to reduce their massive impacts on ranchers and rural landowners who own property above the energy resource. This scale of development, without considering alternatives that could reduce the damage from drilling, could jeopardize the future of 16 species of plants and wildlife, according to the BLM's own report (BLM 2002a).

On New Mexico's Otero Mesa, directional drilling was the preferred method for producing energy after an analysis was completed under the Clinton Administration. However, the current the Bush Interior Department reversed course and changed the proposed action to conventional vertical drilling. A largely intact roadless area supporting a suite of rare wildlife and plant species is now at risk.

There is a stark contrast between what the Bush Administration has promised the public and the drilling policy it has been implementing throughout the Rocky Mountain West. If the Bush administration truly supports a responsible energy policy that reduces the environmental damage from oil and gas development, it will stop paying lip service to directional drilling while continuing to conduct business as usual.

WHAT IS DIRECTIONAL DRILLING?

Directional drilling is an advanced technology that allows oil and gas resources to be tapped a long horizontal distance away from the well site. For the purposes of this report, "directional drilling" will encompass all forms of drilling where the endpoint of the well is distant from the drill site, rather than directly beneath it. Under this definition, slant-hole wells, S-turn wells, and horizontal wells are all considered forms of directional drilling. The term "directional drilling" can also be used to describe drilling to lay subsurface pipelines beneath rivers and other sensitive areas; this application of

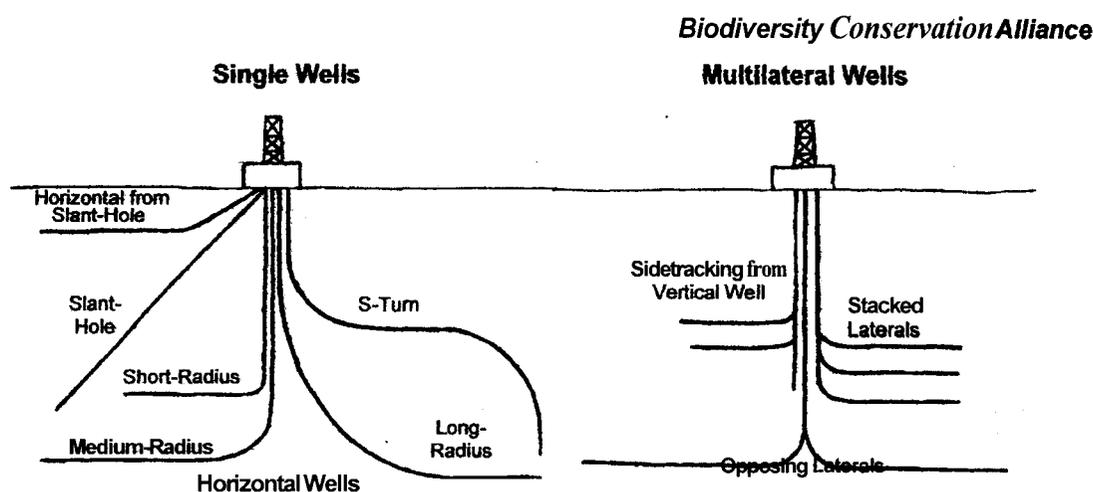


Figure 1. Different types of directional wells,

directional drilling is beyond the scope of this report. A brief synopsis of directional well types follows, and Figure 1 presents a schematic illustration of the various directional well types.

Slant-Hole Wells

Slant-hole wells are drilled at an angle from the vertical, using a tilting drilling rig. Slant-hole wells can be completed without making any bends at all, resulting in the equivalent of a conventional vertical well that is tilted on its axis. Alternately, slant-hole wells can be combined with a horizontal bend that is drilled in much the same way as traditional horizontal wells (see Figure 1), a configuration that is most commonly used for shallow target zones (Smith and Edwards 1992). Slant-holes can also be re-drilled at a later date to add a horizontal section (e.g., Myal and Frohne 1992).

S-Turn Wells

Sometimes known as “deviated wells,” S-turn wells start out in a near-vertical orientation, have a long near-horizontal or diagonal section, and finish by approaching the vertical once again. This well type has been used in extended-reach applications. For example, the Sacate Sa-1, an offshore California well, achieved a horizontal distance of over 3½ miles from the well site using this drilling technique (Elks and Masonheher 2002).

Horizontal Wells

Horizontal wells are defined as wells deviated more than 75 degrees from vertical (Lacy et al. 1992); they often depart from the horizontal in order to track the dip of the target

formation. These wells have a characteristic “J” shape, with the horizontal section following the oil- or gas-bearing rock to maximize production.

Short-Radius

Short-radius wells feature a sharp, abrupt turn from the vertical to the horizontal plane. A comprehensive review of short-radius horizontal drilling found that “[r]eservoir management applications, water and gas coning, injection wells, irregular formations and coal degasification [coalbed methane production] are becoming more economically feasible” (Leazer and Marquez 1995). This study found that short radius horizontal wells make it easier to avoid problem formations above the pay zone. And with short-radius wells, submersible pumps can be placed deeper in the wellbore, improving pumping efficiency and extending pump life. The study concluded that “[s]hort radius technology has evolved to the point where it is a common occurrence to drill a 45-ft radius curve into a 10-ft target and achieve displacements in excess of 1,000 ft.” These wells are not typically used to drill long horizontal distances from the well site.

Medium Radius

Medium-radius wells make their turn from the vertical to the horizontal at an intermediate rate, and the horizontal length is often longer. By the early 1990s in the United States, medium-radius wells were the most widely used and productive of horizontal wells (USDOE 1993). In 1990, the longest horizontal displacement for a medium-radius horizontal well reached 4,164 feet (Moritis 1990). This drilling style figures

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prominently in the horizontal successes of the Austin chalk (Sheikholeslami et al. 1991), and also has been used for very shallow applications in coalbed methane drilling (USDOE 1993).

Long Radius

In a long-radius well, the wellbore shifts from the vertical to the horizontal very gradually, with only slight changes in the degree of slope over the course of the bend. Extended-reach, long-radius horizontal wells were being successfully drilled from platforms off the coast of California as early as 1989 (Moritis 1990). Because this type of drilling requires a long transition between vertical and horizontal, it is best suited to deep wells and/or extended-reach drilling that accesses reservoirs far away from the drill site.

Multilateral

Multilateral wells entail drilling two or more horizontal legs from a single vertical well in order to maximize exposure to the oil- or gas-bearing strata. Opposing laterals are most advantageous for deep wells or cases where drilling costs are high, because information gained in drilling the first lateral can be incorporated into the drilling of the second (Meehan 1995). Stacked laterals have been used for steam injection wells in Canadian heavy oil reservoirs (Sarma and Ono 1995), and to access multiple pay zones (Rixse and Johnson 2002). More complex "fishbone" configurations have been drilled in Venezuela's Orinoco Basin, in which even the laterals have laterals (Moritis 2000).

Chambers (2000) concluded that multilateral drilling was practical for all geologic situations: "There is no depth or specific reservoir type to which multi-lateral use is limited. Multi-laterals are being used for shallow reservoirs (800' TVD [True Vertical Depth]) to deep (15,000' TVD) formations, for completions in heavy oil, light oil, and gas." Meehan (1995) reported that by 1995, multilateral drilling had become "routine" at Union Pacific Resources. Meehan (1995) stated, "State of the art drilling includes as many as four, 4,000+ ft horizontal laterals, horizontal wells at TVDs [True Vertical Depths] greater than 16,000 R."

Multilateral drilling has now become an established practice within the oil and gas industry. Chambers (1998) summarized this growing role: "The implementation of multiple lateral wellbores, or multiple horizontal wells exiting a single wellbore, has gained wider

acceptance in the oil industry, particularly from a reservoir management point of view. The deeper the junction, the more attractive multilaterals become. The more wells drilled, the cheaper the technology, the more laterals drilled from a well, the less the incremental cost for additional laterals. Open hole branches are very easy to create and fast to implement."

HISTORY OF DIRECTIONAL DRILLING

Directional drilling is not a new technology. In fact, all types of directional drilling have been around for years, but it is only in the last several decades that these techniques have gained broad acceptance and widespread application. The first horizontal well was drilled near Texon, Texas in 1929 (USDOE 1993). Chambers (1998) noted early horizontal activity dating from 1939. In the early 1940s, horizontal wells were drilled with horizontal distances of 100 to 500 feet (Anon. 1999). China attempted its first horizontal well in 1957 (USDOE 1993). The first coiled-tube and slimhole drilling was also done during this period (USDOE 1999a). The first multilateral well was drilled in the Soviet Union in 1953 (Chambers 1998), and between 1953 and 1980, the Soviet Union drilled 111 multi-branch horizontal wells including exploration wells, production wells, and injector wells (Maurer 1995). Nonetheless, during these early years, directional drilling was comparatively costly and failed to achieve broad acceptance within the industry.

Slant-hole drilling was the first directional technique to achieve widespread use. Between 1982 and 1992, over 1,000 slant or angle wells were drilled, primarily in Canada, Venezuela, and China (Smith and Edwards 1992).

But the big boom came with the widespread use of horizontal drilling. European offshore successes with directional drilling in the North Sea (e.g., Andersen et al. 1988, Jacobsen and Rushworth 1993) led to increasing application of directional technologies to land-based drilling. Horizontal drilling soon took off in North Dakota's Williston Basin, and as of 1990, some 70 horizontal wells were producing about 7% of North Dakota's oil from the Bakken Shale formation (Petzet 1990). For northern Alaska's Prudhoe Bay field, Standing (2000) noted, "Horizontal drilling started experimentally in 1986, and in the 1990s became routine for lengthening wellbores and avoiding gas-oil or water-oil contacts." Perhaps the largest application of horizontal drilling came in the Austin Chalk deposits in Texas, a formation

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where production from vertical drilling had been declining. Union Pacific Resources drilled more than 1,100 new horizontal wells and 1,250 horizontal laterals from existing wells in the Austin Chalk between 1987 and 1995 (Meehan 1995). **With** success in the Texas Austin Chalk, 134 horizontal wells were soon drilled or permitted in the same formation in Louisiana (Maloy 1997). The first **directional well** in Wyoming was completed in 1987, and as of 1994, 80 producing wells were completed out of 117 attempts (Stewart 1995).

Directional drilling has caught on not only in North America but all around the world. Between 1990 and 1998, Petroleum Development Oman drilled 350 horizontal wells in 33 different Middle Eastern oil and gas fields (Ishak et al 1998). Horizontal wells have been drilled on every continent except Antarctica. Today, horizontal drilling technology is so efficient at extracting oil and gas that it has become the benchmark for the industry: Miller and Steiger (1999) boasted that their array of vertical and directional wells had production that equaled high benchmark projections **from** horizontal drilling. In the words of Pinney and Rodrigues (1999), "Over the past 20 years, horizontal **drilling** has progressed from **an** exotic technology to a standard industry tool."

DIRECTIONAL CAPABILITIES

Directional drilling in general, and horizontal drilling in particular, are extremely versatile and offer capabilities that make these technologies superior to vertical drilling for the recovery of oil and gas. Deskins et al. (1995) stated that horizontal wells can improve production and increase reserves through (1) intersecting natural fractures that can't be accessed with vertical wells; (2) delaying the onset of water or gas coning so that more oil is produced; (3) improving production from thin or tight reservoirs; and (4) improving waterflood sweep efficiency (for reservoirs injected with fluids to increase oil or gas production). Zammerilli (1989) compared the effectiveness of three drilling methods for the Devonian Shale of West Virginia and found that "new-lease horizontal drilling is the optimal method [for maximizing production] in West Virginia, and high-angle drilling results in a slight improvement over vertical drilling." An article in *Journal of Petroleum Technology* summarized the current role of horizontal drilling: "Most experts agree that horizontal wells have become a preferred

method of recovering oil and gas from reservoirs in which these fluids occupy strata that are horizontal, or nearly so, because they offer greater contact area with the productive layer **than** vertical wells. While the cost factor may be as much as two or three times that of a vertical well, the production factor can be enhanced **as** much **as** 15 or 20 times, making it very attractive to producers" (Anon. 1999).

Each of the qualities of directional drilling that make it a viable alternative to vertical drilling in the Intermountain West have been thoroughly documented in the published literature, and are discussed in more detail below.

Directional Drilling Increases Production

Directional wells, and horizontal wells in particular, offer substantial increases in production over vertical wells, chiefly because in the words of Hall (1998), "[h]orizontal drilling exposes magnitudes more of the pay zone to the wellbore. Hutzler (2000) summarized the basis for this phenomenon as follows: "Drilling a horizontal, **as** opposed to **a** conventional vertical well, enables more of the reservoir to be exposed **to** the wellbore since most reservoirs **are** wider than they are deep." Table 2 displays the results of a number of studies worldwide that directly compared the productivity of horizontal wells with their vertical counterparts.

In one Utah project, for example, 143 laterals were drilled **and** completed as re-entries **from** 43 vertical wells. For those 43 wells, 180,000 feet of wellbore penetrated the pay zone, **compared with** only 26,000 feet for **all** 379 **of the** previous vertical wells in the field (Hall 1998). Iverson et al. (1995) found that even without hydraulic fracturing, a horizontal well in Wyoming produced **as much** gas as a comparable conventional well that used hydraulic fracturing (see Appendix for an explanation of hydraulic fracturing). In Texas, Sheikholeslami et al. (1991) found a linear increase in production with longer horizontal sections: "This relationship and the low cost of drilling incremental medium-radius horizontal lengths show the **economic** benefit of drilling the longest possible horizontal length."

But there are limits to the increases that horizontal wells **can** achieve over conventional vertical wells. Cho and Shah (2002) found that beyond 3,000 feet horizontal distance, wellbore friction and turbulence may **reduce gains** achieved through a longer exposure to the pay zone, to the point that a maximum output is achieved. These researchers pointed out that

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Table 2. Horizontal/directional well production expressed as a percentage of vertical wells from the same field.

Location	Production Increase	Notes	Source
Alaska	200-300%	Prudhoe Bay	Broman and Schmor 1992
California	300%	Elk Hills	Gangle et al. 1991
California	700%	Elk Hills	Gangle and Ezekwe 1995
California	350-900%	Elk Hills	Anon. 1996
Colorado	500-1000%	Piceance Basin	Myal and Frohne 1992
Canada	250-800%	underbalanced, heavy oil	Teichrob 1994
Colombia	400-400%	offshore	Huang et al. 1996
Germany	200-300%	deep gas	Graute et al. 1994
Germany	500%	deep, sour gas	Schuler 1992
North Dakota	200-500%	Bakken shale	Lacy et al. 1992
North Sea	600%	offshore	Reynolds and Seymour 1991
Texas	250-700%	Austin chalk	Sheikholeslami et al. 1991, Lacy 1992
Venezuela	1300%	Orinoco heavy oil	Lacy 1992
West Virginia	700%	hydraulic fractured	Yost and Overbey 1989
West Virginia	400-2500%	Devonianshale	Lacy 1992

friction may be less important if the wellbore is subjected to low pressures. Thus, there may be an upper limit to production increases over vertical wells that can be realized by drilling with horizontal technologies. But in no case does wellbore friction reduce productivity of a horizontal well below that of a vertical well.

Because one might expect directional drilling attempts that produce successfully to be publicized more often than failures, it is useful to examine the overall technical success rate of horizontal wells over a broad area. Deskins et al. (1995) took a comprehensive survey of horizontal wells in North America, and found that horizontal wells enjoyed technical success in 95% of U.S. reservoirs where they were employed, compared to a success rate over 90% for Canadian horizontal wells. These figures were calculated by reservoir rather than by individual well, and the technical success figures are likely to underestimate the true success rate because reservoirs with a handful of failures were given the same weight as reservoirs with thousands of successful wells (Deskins, pers. comm.). Unfortunately, technical success rates for vertical wells were not presented for the sake of comparison.

Directional drilling has been shown to maximize oil and gas production in virtually any oil and gas recovery situation. As early as 1990, Stagg and Reilly proclaimed that "Industry is no longer constrained by the mechanical aspects of horizontal well completions. Equipment and techniques are available, or soon will be

available, to meet all completion needs." These methods are feasible for both exploration and full-field development (French Oil and Gas Industry Association 1990). The effectiveness of horizontal drilling as an exploration tool was noted by Hawkings et al. (1990), who reported that a horizontal well was able to locate high permeability sands where conventional wells had failed. Aguilera et al. (1991) lauded the potential of horizontal drilling in infill situations. According to Thakur (1999), "As a general rule, readers are encouraged to consider horizontal wells as the primary option for a field." These studies and technical reports by the oil and gas industry illustrate that directional drilling is a versatile and viable alternative and should be considered where oil and gas is proposed for development because of its ability to meet or exceed the production ability of vertical wells.

Directional Drilling Can Tap Distant Resources

Directional drilling can now tap pockets of oil and gas that are miles away from the drilling site. Horizontal drilling can reach subsurface reservoirs up to 29,000 feet away from the drilling site in horizontal distance (Al-Blehed et al. 2000) and, in some cases, even farther. The Exxon-Mobil Sacate Sa-2 well is believed to hold the current North American record for horizontal displacement, reaching a final distance of 21,277 feet (just over 4 miles) from the drilling site; this feat was achieved offshore in over 650 feet of water (Elks and Masonheher 2002). Elks and Masonheher went on to state,

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“Horizontal deviations [for wells in this project] could ultimately exceed 35,000 feet,” a distance of over 6½ miles.

In 1997, China’s Xijiang 24-3-A14 well achieved a horizontal displacement of 26,452 feet, or over 5 miles (Jiang and Nian 1998). Vighetto et al. (1999) reported on the successful drilling of extended-reach horizontal wells with horizontal displacements of up to 34,728 feet. This example shows the oil and gas industry’s current ability to use horizontal drilling to produce from reservoirs more than 6½ miles away from the drilling rig. And according to industry, even greater gains in distance capabilities are likely in the offing. Ron Auflick of K and M Technologies even goes so far as to claim in the press that extended reach drilling rigs will be able to drill nearly 20 miles from the drilling site within the next 10 years (in Schneider 2001).

These industry reports demonstrate the viability of extended-reach drilling technologies to tap oil and gas reserves across great distances. Such long-reach technologies provide the technical capability to extract oil and gas from lands where surface damage from conventional drilling is barred in order to protect the important surface values of sensitive landscapes.

New Steering Technologies Allow for Greater Drilling Accuracy

Advances in modern technology now allow operators to steer the drill bit through the Earth with pinpoint accuracy, unlocking the resources from distant pools of oil and gas. This “geosteering” is aided by three-dimensional computer programs that allow modeling and visualization of the drill path through the Earth, enabling the operator to guide the drill bit in real-time; this technology has been tested and proven accurate in the Gulf of Mexico, North Sea, and onshore Latin American locations (Sanstrom and Longorio 2002).

The technology that allows this real-time steering of the drill bit is alternately known as “Measurement While Drilling” (MWD) or “Logging While Drilling” (LWD). These technologies gather information at the well bit and instantaneously send it back to the drill engineer, who controls the bit. Corrections can be made immediately if the drill bit strays from the target zone, or to avoid obstacles (Maurer 1995). Barry et al. (1998) reported a case history where Logging-While-Drilling techniques were used to geosteer horizontal wells in real-time along a 40-foot column of oil trapped between an

aquifer and a gas cap. The authors of this study noted, “Excellent well performance supports the general validity of the geosteering approach and a static pressure survey in one of the wells verifies the steering accuracy.” Geosteering has become so precise that a multilateral well off the coast of Nigeria was successfully completed within a target window of only +/- 2 feet (Aloko et al. 1998).

DIRECTIONAL DRILLING IS EFFECTIVE IN MANY GEOLOGIC SETTINGS

Directional drilling, in its several forms, has proven to be remarkably versatile as an alternative to conventional vertical drilling in recovery of all types of petroleum resources. In the United States, directional drilling has met with economic success in most of the major oil and gas-bearing rock formations (see Table 3, following page). Aguilera et al. (1991) stated, “Theoretically, all reservoirs can benefit from horizontal wells.” Al-Blehed et al. (2000) asserted that horizontal drilling is superior to vertical drilling for a variety of conditions including naturally fractured reservoirs, thin reservoirs, heterogeneous reservoirs, vertical permeability homogeneous reservoirs, reefs or isolated sand bodies, and faulted reservoirs. Joshi (1991) asserted that for natural gas production, horizontal wells improve drainage area per well for low-permeability geologic formations and reduced near-wellbore turbulence and increase delivery efficiency for high-permeability formations. Robertson et al. (1992) concluded, “Horizontal wells appear to improve the chances of attaining commercial gas production rates from heterogeneous formations.”

Directional drilling offers superior production even when applied to most geologically difficult circumstances. In Germany, an 11,200-foot-deep sour gas well achieved a fivefold production increase over nearby vertical wells. Of this well, Schuler (1992) noted, “The drilling was in a geologically difficult environment with tight target tolerances.” In Argentina, horizontal drilling was used to successfully explore a deep, fractured gas reservoir involving hanging wall anticline traps (Blangy 2002). In China’s Shixi Field, 5 horizontal wells were drilled into deep volcanic formations with multiple fracture systems and high pore pressure. Of these wells, Xinzhong et al. (1998) observed, “It is very difficult to drill the horizontal well due to the specialty and complexity of its geological configuration, hole construction, and operational requirement. Now 5 horizontal wells with 5000m

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Table 3 U. S. geologic formations where directional projects have successfully produced oil and gas.

Location	Formation	Source
Alabama	Pottsville coal	Swindell 1996
Alaska	Tarn formation	Phillips Petroleum 2002
	West Sak formation	Phillips Petroleum 2002
	Alpine formation	Phillips Petroleum 2002
California	Stevens sand	Gangle and Ezekwe 1995, Anon. 1996
	Veder sand	Chenot et al. 2002
	Monterey chert	Elks and Masonheimer 2002
Colorado	Niobrara sandstone	Petzet 1990, Stright and Robertson 1993
	Codell formation	Swindell 1996
	Mesa Verde sandstone	Myal and Frohne 1992
	Cameo coals	USDOE 1993
Kentucky	Devonian Shale	Bellinger 1991
Louisiana	Austin Chalk	Swindell 1996, Maloy 1997
	Miocene	Swindell 1996
	Cotton Valley	Swindell 1996
	Wilcox sandstone	Lacy et al. 1992
Michigan	Antrim	Swindell 1996
	Dundee limestone	Wood 1997
Montana	Red River	Swindell 1996
	Mission Canyon	Swindell 1996
New Mexico	Fruitland coal	USDOE 1993, Swindell 1996
	Mancos shale	Swindell 1996
North Dakota	Bakken shale	Swindell 1996
	Madison limestone	Swindell 1996
Ohio	Clinton sandstone	McCormac 1996
	Rose Run sandstone	McCormac 1996
Oklahoma	Bartlesville	Swindell 1996
	Mississippi	Swindell 1996
	Viola	Swindell 1996
	Hunton	Swindell 1996
South Dakota	Red River	Swindell 1996
Texas	San Andres dolomite	Leazer and Marquer 1995
	Montoya Limestone	Fletcher 2002
	Devonian fm.	Fletcher 2002
	Austin Chalk	Swindell 1996
	Buda	Swindell 1996
	Georgetown	Swindell 1996
	Ellenburger	Swindell 1996
Wilcox fm.	Doughtie 1994	
Utah	Desert Creek dolomite	Leazer and Marquez 1995, Swindell 1996, Chidsey et al. 2002
	Twin Creek	Swindell 1996
	Paradox shale	Morgan 1996
	Ismay limestone	Chidsey et al. 2002
West Virginia	Devonian Shale	Zammerilli 1989, Salamy et al. 1991
Wyoming	Nugget sandstone	Weather 1998
	Almond formation	Iverson et al. 1995
	Niobrara sandstone	Swindell 1996
	Minnelusa	Swindell 1996
	Frontiersandstone Hanna coals	Swindell 1996 Logan 1988

MD [Measured Depth, the overall length of the wellbore] have been drilled successfully." On Alaska's North Slope, the Schrader Bluff Pilot Project involved **two** stacked horizontal wells drilled into heavily faulted sandstone formations with target zones only 25 feet and 28 feet thick, respectively. Using geosteering technology, the paired wells successfully followed the narrow pay formation as it rose and dipped across numerous faults; both wells achieved economic success (Rixse and Johnson 2002).

Horizontal drilling has proven successful in a variety of geological settings, as discussed in numerous **industry** and government reports summarized on Table 3.

Shallow Reservoirs

Directional drilling has been employed to successfully access shallow reservoirs in a number of cases. Slant-hole drilling can be paired with horizontal techniques for shallow reservoirs; a well was drilled using **this** technique near the town of Brooks in southern Alberta, reaching a depth of **1,886** feet and a horizontal displacement of 4,200 feet (Smith and Edwards 1992). In the Black Warrior **Basin**, Mississippi Valley Gas Company successfully drilled a well **1,805** feet in depth with a horizontal leg of **1,650** feet. The well produced gas **from** a storage field at 6 times the rate of neighboring vertical wells (Butler and Skeen 1996). Multiple horizontal laterals have been drilled for formations as shallow as 800 feet (Chambers 2000). In Wyoming's Hanna **Basin**, three medium-radius horizontal wells successfully accessed **coalbed** methane at a depth of only **363** feet (Logan 1988). Thus, there appears to be no reservoir too shallow for horizontal drilling.

Deep Reservoirs

Directionally drilling has accessed some of the world's deepest oil and **gas** deposits. As of **1995**, the Navasota #1 well was the deepest horizontal well in the Austin Chalk, at **14,172** feet (Pearce et al. 1995). In the Goodwyn gas/conglomerate field in Australia, the GWA-13 well **was** drilled to **24,620** feet total depth with a horizontal displacement of **9,400** feet (Dolan et al. 1998). Horizontal wells in the Permian **Basin** of west Texas now exceed depths of 14,000 feet (Fletcher 2002). Schuler and Santos (1996) reported success with hydraulic **fracturing** on what was then the world's deepest horizontal well (**15,687** feet deep). In Alaska's Cook Inlet, the Forest Oil Redoubt #4 well was drilled

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deeper than 18,872 feet from an offshore rig (Anon. 2002b).

Horizontal and directional technology has proven itself in ultra-deep settings where temperatures and pressures can be intense. In the Middle East, a short-radius sour gas well was successfully drilled to a depth of 14,115 feet in the deep, hot Thamama limestone from an offshore drilling rig (Simpson et al. 1993). Based on drilling deep horizontal wells in Germany, Graute et al. (1994) concluded, "Results of both wells proved that horizontal drilling into these deep reservoirs is technically feasible and economically attractive."

Deep horizontal wells have achieved substantial production successes. A well drilled into the ultra-tight, high pressure, high temperature Roetliegendes sandstone in Germany produced at a rate 3.5-9 times greater than hydraulically fractured vertical wells (Schuler and Santos 1996). According to Krystinik (2001), a horizontal well drilled in Wyoming's Green River Basin reached a depth greater than 15,000 feet in tight-gas sandstone, was drilled at a cost that was reduced to 50% of the industry average, and achieved economic production of greater than 14 million cubic feet of gas per day.

These reports illustrate that use of directional drilling in deep reservoirs is effective and productive. Reaching depths of over 15,000 feet in Wyoming and elsewhere in the world, this technology clearly is versatile enough to be considered in all reservoirs.

Tight Reservoirs

Tight reservoirs are formations of very low permeability, which impedes the flow of oil and gas to the well. Nonetheless, directional wells have proven both feasible and profitable in these geologically challenging settings. Mostafa (1993) reported that horizontal drilling in tight carbonate reservoirs improved production and reduced oil and water coning. Horizontal drilling has proven profitable in the tight chalk reservoirs of the Danish North Sea (Andersen et al. 1988). In the Permian Basin of west Texas, EOG Resources reported successful completions in 14 of 15 horizontal wells of the tight Devonian formation (Fletcher 2002). Directional drilling has been shown to increase rate of gas production and overall recoverable quantity for tight gas sands (e.g., Cassetta 1998).

Kabir et al. (1997) linked horizontal drilling effectiveness in tight carbonate reservoirs with ability to intercept fractures. Because fractures tend to be oriented vertically, wellbores traveling

horizontally through a formation have a far greater capability to successfully intercept fractures than vertical wells, which have a rather short passage through the target formation. For tight gas reservoirs that are naturally fractured, horizontal drilling compares favorably with massive hydraulic fracturing and is a sound alternative (van Kruysdijk and Niko 1988). For northwestern Colorado fractured sandstones, Stright and Robertson (1993) stated, "The advantage of a horizontal well over a vertical Niobrara well is higher probability of encountering well-developed fractures, a common problem with vertical Niobrara wells." Hydraulic fracturing can be used in conjunction with horizontal drilling to enhance the productivity of tight reservoirs lacking in natural fractures (Soliman et al. 1996).

Based on these studies, it appears that directional drilling may have a distinct advantage over conventional vertical drilling in tight formations, particularly where fractures are intercepted to release the gas resource.

Heavy Oil

Directional drilling has proven effective in tapping heavy oil deposits in tar sands. Luhowy (1993) reported that "Horizontal wells proved economical for developing, under primary recovery, viscous heavy oil from the unconsolidated McLaren sand channels in Saskatchewan." On Alaska's North Slope, the West Sak heavy oil reservoir is being developed using multilateral horizontal technology (Phillips Petroleum 2002). For heavy oil recovery, Shirif (2000) noted that, "For a given pattern, there is a horizontal well configuration that maximizes the total production rate."

Coalbed Methane

Although vertical drilling currently dominates coalbed methane fields, directional drilling is increasingly being applied to the production of this unconventional resource. According to Moore and Moore (1999), directional drilling is applicable to coalbed methane production, but drilling rig placement may be constrained by rock jointing and fracture patterns. Horizontal wells have been drilled for coalbed methane in Colorado's Piceance Basin using short radius technique, and in Wyoming's Hanna Basin using medium-radius technique (Logan 1988). According to the West Virginia Geological and Economic Survey's coalbed methane database, CDX Gas drilled 13 horizontal wells in West Virginia's Welch Field, which produced 1.5

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trillion cubic feet of coalbed methane between 1999 and 2000.

Furthermore, horizontal drilling for coalbed methane appears to be an effective method to increase production. In discussing Penn Virginia Corporation's coalbed methane program, company president A. James Dearlove has stated, "By using horizontal drilling on our coalbed methane and Devonian shale acreage, we expect to significantly accelerate gas production, which should increase the present value of our properties" (quoted in Anon. 2002a). One horizontal well drilled in New Mexico's San Juan Basin produced almost seven times the coalbed methane as the average vertical well in the area (USDOE 1993).

Horizontal methods can also yield substantial increases in coalbed methane producible reserves. In Colorado's San Juan Basin, multilateral drilling by CDX gas is expected to recover 50-75% of available coalbed methane reserves, compared to 10% for conventional methods (McWilliams 2002). According to Wayne Kelley, president of Texas-based Omega Oil Company, multilateral technology using coiled-tube drilling in coalbed methane fields "would replace 220 well pads on the surface with a single well pad" (as quoted in Bleizeffer 2002).

With the dramatic expansion of coalbed methane contemplated for the Intermountain West, directional drilling appears to be a viable alternative to the conventional wells that currently dominate the production of this resource. Conventional methods of coalbed methane production typically entail a high density of roads, well pads, pipelines and transmission lines that can be reduced to some extent by clustered directional drilling. But coalbed methane development also creates the additional problem of disposal of millions of gallons of wastewater, which must be removed from the coal seam before the gas can be extracted. This water is often highly saline or alkaline (e.g., Hulin 2001), and the dumping of such toxic wastewater into streams and groundwater can have disastrous ecological effects. Dumping coalbed methane wastewater onto the surface has unacceptable ecological, economic, and social impacts that are beyond the scope of this report but that should be addressed before this resource is developed.

Thin Reservoirs

Horizontal wells can travel along the pay zone of thin reservoirs for long distances, dramatically improving production over vertical

wells that have only a short trip through the pay zone. In Trinidad's Immortelle Field, six "highly successful" horizontal wells were drilled to tap a 48-foot thick oil play (Thakur et al. 1996). In a remote area of Sumatra, a horizontal well was successfully drilled into a 33-foot-deep oil column (Ournutt et al. 1993). Horizontal drilling has been used to produce gas from a pay zone only 10 feet thick in Pleistocene sands in the Gulf of Mexico (Gidman et al. 1995). A dual-lateral horizontal well off the coast of Nigeria was successfully drilled along an 11-foot oil column trapped between a gas cap and an aquifer.

Horizontal drilling yields superior production for thin reservoirs. Production from horizontal drilling into a 130-foot thick oil rim off the coast of East Malaysia has yielded two to eight times the production of vertical wells in the area (van der Harst 1991). In its Pelican Lake project, CS Resources used horizontal wells to target pay zone that was a mere 13-20 feet thick. These horizontal wells achieved productivities that were five to thirty times greater than neighboring vertical wells, with longer horizontals yielding the higher productivities (Sarma and Ono 1995).

Depleted Reservoirs

Due to its higher efficiency in recovering oil and gas, horizontal drilling has proven to be an excellent method to revitalize depleted reservoirs. In Oklahoma's Caddo County, a well with a 4,000-foot horizontal displacement was drilled into a depleted sandstone reservoir, achieving a production of 1,800 barrels of oil per day with very little gas coning—the mixture of gas and oil that reduces production efficiency (Beardmore et al. 1994). In Michigan, horizontal laterals from old wellbores yielded more than a threefold increase in oil production over vertical wells, effectively revitalizing the depleted Niagaran fields (Lanier 1996). A more complete accounting of successes in depleted reservoirs is presented in the section of this report titled "Increasing Producibile Reserves."

ECONOMIC ADVANTAGES OF DIRECTIONAL DRILLING

The oil and gas business has always been inherently risky, and profitability is based in large part on market prices of oil and gas products. No drilling method, whether vertical or directional, can insulate a drilling company from the possibility of individual economic failures. Nonetheless, the overwhelming majority of published studies on the subject demonstrate that

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directional drilling is not only economically feasible but is in fact substantially more profitable than conventional, vertical drilling due to its superior cost-benefit ratio, even though the costs to drill a directional well may be **higher** in some cases.

Costs of Individual Wells

In 1991, Fritz et al. noted, "If the cost of drilling a horizontal well was equal to that of drilling a vertical well, most reservoirs would be candidates for horizontal drilling." These costs are in fact equalizing. Aalund and Rappold (1993) found that the cost of drilling two horizontal wells in Egypt was **1.4** times the cost of drilling conventional wells, and made the following prediction: "As horizontal drilling becomes more common, the cost of horizontal wells will decrease to near that of vertical wells in the Middle East." Under Elf Aquitaine's drilling program, horizontal well costs averaged 1.5 times the cost of vertical wells (Thakur 1999). On the basis of cost per foot of drilled wellbore, **directional** drilling is only slightly more expensive than vertical drilling. According to Sarma and Ono (1995), "The 1993 Joint Association Survey of drilling costs on **845** horizontal wells indicated that **at \$80.76/ft**, a horizontal well was only 8% more expensive to drill per foot than a vertical well." Hawkings et al. (1990) reported that a horizontal gas well in the Roetliengendes Field in Germany cost roughly the same to complete as a fracture-stimulated Conventional well. Thus, compared to vertical wells, the costs for drilling a directional well can be higher than, or sometimes equal to, costs for drilling a vertical well. **But horizontal wells** often yield much higher oil and gas production than vertical well, offsetting cost increases (see following section).

For each new formation, there is a learning curve that progressively drives down the cost of horizontal drilling as more wells are completed. Lacy et al. (1992) summarized this effect as follows: "As drilling experience is gained in a certain area, horizontal well costs decrease. The first well usually costs two or three times more than a vertical well. The second well usually costs much less than the first one. After drilling a few wells, the horizontal/vertical well cost ratio is about 1.5. Therefore, a multi-horizontal well program has a better chance for economic success."

Technological advances are bringing down the cost of horizontal drilling. Slant-hole and coiled-tube drilling can be used to bring down

the costs of horizontal drilling. According to Smith and Edwards (1992), "Slant hole drilling technology can result in considerable savings over conventionally drilled deviated holes because mud motors and deviation control with measurement while drilling tools are usually unnecessary." Slimhole and coiled-tube drilling offers further economic advantages in drilling horizontal laterals from existing boreholes. McCarty et al. (2002) reported that for 64 sidetracks drilled in 2002 on the North Slope with coiled-tube methods, costs averaged less than one-half that of conventional rotary sidetracks. This study concluded that "CTD [coiled-tube drilling] has matured into a highly efficient and economical means of sidetracking wells on the North Slope." According to the U.S. Department of Energy, "a typical **10,000-foot** well drilled in southwest Wyoming costs about \$700,000, but with coiled tubing and slimhole, the same well would cost \$200,000 less" (USDOE 1999a).

Multilateral horizontal wells take the economic savings to an even higher level. According to Maurer (1995), "Multibranch horizontal wells can reduce horizontal drilling costs by 20 to 30% and the size and number of offshore platforms by 50%." In the same study, Maurer noted that "Unocal stated that its **B-34** trilateral well [in the Dos Quadras offshore field] cost \$2 million compared to \$3 million for three conventional horizontal wells (\$1 million each)." Just as with single horizontal wells, there is a learning curve associated with multilateral wells (Chambers 1998). Moritis (2000) found that for multilateral wells in Venezuela, the cost of drilling a single lateral leg decreased from \$1 million to \$700,000 during the course of the project, while the cost of drilling complex "fishbone" configurations decreased from \$1.7 million per well to **\$1.2 million**. For drilling horizontal laterals from existing wellbores, Lanier (1996) reported that costs decreased from \$600,000 to \$350,000 per well during the course of the 20-well program.

Higher Cost-Benefit Ratio of Directional Wells

It is important to recognize that well cost alone provides a poor comparison between conventional and horizontal technologies; it tells only half the story. For a true economic comparison, the difference in cost must be measured against difference in productivity. For the Seidenburg 2-17 well, a deep well in a German sour gas field, drilling and production costs were 1.2 times greater for a horizontal well, but production exceeded that of vertical wells by

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a factor of 4.5 (Niggeman and Ehlers 1991). In a continent-wide survey of horizontal wells in 1995, Deskins et al. found that while U.S. horizontal wells were twice as expensive on average than vertical wells, their output of oil or gas averaged 3.2 times as much as vertical wells. With over three times the product for only twice the cost, it is easy to see that horizontal wells were in fact more economical on average than vertical wells. In the same study, Canadian horizontal wells produced 4.1 times as much product on average as vertical wells with only 2.2 times the investment, an even higher economic advantage for horizontal wells than in the U.S. For the Devonian shales of the Appalachian Basin, Salamy et al. (1991) stated, "Recent drilling and completion operations have demonstrated the technical and economic successes of horizontal wells over vertical wells." Thus, while costs are slightly higher to drill directional wells, the higher costs of individual wells are more than offset by dramatically increased production.

Economic Success of Individual Wells

As is the case with vertical wells, there are no guarantees that individual directional wells will turn a profit. For 20 horizontal wells in Colombia, Saavedra and Joshi (2002) reported that costs were 1.5-2.5 times the cost of comparable vertical wells. Of these wells, two of the four completed in carbonate formations became economic successes, while 88% of the horizontal wells drilled in sandstone achieved economic success. In a survey of horizontal drilling in U.S. fields (Deskins et al. 1995), economic success rates averaged 54% (59% for clastics, 45% for carbonates). Canadian economic success rates were 59% for light-oil clastics, 79% for carbonates, and 92% for heavy oil reservoirs. Once again, this survey likely underestimated economic success rates for individual wells by calculating economic success by reservoir rather than by individual well: Reservoirs with initial horizontal failures do not inspire repeat attempts, and this survey gave reservoirs with a few failed wells the same weighting as reservoirs with thousands of successful wells (Deskins, pers. comm.). No economic success data were provided for vertical wells over the same period for comparison purposes, and it is unknown how the market prices of the day may have influenced the profitability ratings of wells in this study.

It is useful to consider the factors behind the minority of horizontal wells that do not prove

profitable. For Canadian horizontal wells that failed to achieve economic success, Sarma and Ono (1995) summarized the primary factors: (1) The wellbore missed the target zone or improperly placed within target zone; (2) Vertical permeability was low. Deviated wells with multiple laterals were found to be favorable for this situation; (3) In a fractured reservoir, the well failed to intersect fractures as anticipated; (4) Formation damage or excessive well undulation made cleaning difficult; (5) The well traversed unexpected variations in rock formations, leading to water coning; (6) The presence of flow barriers such as shale streaks inhibited production (but flow barriers can also augment production by inhibiting coning); (7) Feasibility studies were poor (e.g., based solely on simulations). Some of these problems can be overcome through improved planning and performance, while others are inherent and would likely affect vertical wells in much the same way.

Profitability for Large-Scale Projects

To evaluate a fundamental shift from vertical drilling to directional drilling, it is best to evaluate the economic advantages of implementing directional drilling on a large scale. Because each directional well drains a greater reservoir volume than a corresponding vertical well, fewer wells are required to drain a reservoir, reducing up-front project costs (Fritz et al. 1991). The technology continues to improve and efficiencies in using this technology will also likely increase. Al-Blehed et al. (2000) stated that their use of horizontal wells reduced drilling, flowline, and facilities costs by 20-25% over vertical drilling. Turaiki and Raza (1998) reviewed the track record of horizontal drilling in Saudi Arabia. They reached the conclusion that "Implementation of [3-D seismic, horizontal drilling, and multi-lateral drilling] has had a pronounced effect on reducing capital and operating costs. Development planning has become more cost-effective, oil production rate declines are being arrested, plateau oil rates are being sustained over longer duration, and oil recoveries are being improved."

These improved efficiencies in oil and gas recovery have translated into real economic successes when directional drilling technologies are applied on a large scale. Meehan (1995) evaluated Union Pacific Resources' horizontal drilling program in the Austin Chalk: "UPRC's first 1,000 horizontal wells have been an economic success," he reported, returning 19%

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over their expenses. As of 1993, horizontal drilling was reducing total drilling, flowline, and facilities costs in the Middle East by 20-25% while improving well capacity by 150-400% (Aalund and Rappold 1993). Fritz et al. (1991) compared the costs of older-technology directional drilling with vertical drilling and found that oil production costs per barrel were lower for directional drilling in the Austin Chalk, but higher in the Williston Basin of North Dakota. According to Maloy (1992), "Horizontal drilling in Giddings field Austin Chalk has significantly improved well recoveries and more than offset drilling costs."

According to Harrison et al. (1994), techniques to control production unique to horizontal drilling make production from certain types of sandstone reservoirs profitable, which would be unprofitable with vertical drilling. Baker et al. (1984) performed an economic analysis on coalbed methane recovery via directional drilling and found it to be economically feasible. Based on BP's horizontal drilling experiences in the Gulf of Mexico, Sadgett et al. (1994) stated that "[t]he wells have provided access to reserves isolated by depositional features within the reservoir at a cost equal to or less than that of conventional drilling." According to Sarma and Ono (1995), "Most IOR [improved oil recovery] with horizontal wells has been successful, both in terms of oil productivity and economics. In most cases, project cost has been realized within months of production."

When horizontal drilling is applied broadly, the increases in oil and gas production more than compensate for higher costs per well. According to studies, directional drilling appears to yield economic advantages on a large scale. Even in individual cases where directional costs are higher, the overall cost-benefit of directional drilling appears to favor this technology over conventional vertical drilling.

INCREASING PRODUCIBLE RESERVES

Numerous reports have also found that directional drilling is also more effective at removing oil and gas from geologic formations than conventional vertical wells. Thakur (1999) reported that because horizontal drilling is a more efficient extraction method, it increases the recoverable reserves for a given reservoir.

There are numerous cases where horizontal or other directional drilling has rejuvenated oil and gas reservoirs that previously were dormant. The Anglia gas field of the western North Sea was unproductive with vertical drilling, even

with well stimulation and fracturing technologies. But "at a small cost premium, the [horizontal drilling] method enabled a marginal field to be developed successfully" (Guyatt and Allen. 1996). The Tyra Field of the Danish North Sea, which originally produced only gas, became a productive oil field due entirely to the success of horizontal drilling (Nykjaer 1994). In northern Alberta, horizontal wells are being used to tap "attic oil" missed by previously existing vertical wells (Morrissey 1996). In Canada, declining or shut-in fields such as the South Bodo, Edam West Sparky, Midale Bed Unit 5, Weyburn, and Cummings-Dina pools returned to strong production through horizontal drilling (Sarma and Ono 1995). In south Texas, the Pearsall Field had been abandoned as uneconomic until it was rejuvenated through horizontal drilling (Lichtenburger 1990). Based on initial successes, horizontal drilling is expected to yield an additional 80 million barrels of oil from the moribund Crystal Field in Michigan (Wood 1997).

Directional drilling can profitably tap new fields that are unprofitable to develop with conventional vertical methods. Jacobsen and Rushworth (1993) evaluated horizontal drilling in the Troll field of the Norwegian North Sea. They summarized their findings as follows: "Under the large gas accumulation of the Troll field lies a significant quantity of oil. However, this oil is contained in thin layers distributed over a wide area and therefore cannot be developed using conventional wells. In 1988 Norsk Hydro re-evaluated possible development schemes for the oil resource, and concluded that the application of horizontal well technology could provide an economically viable means of developing the resource." Following successful test wells, full-scale development followed. A five trillion cubic foot sweet gas play in northeastern British Columbia was rendered feasible by horizontal drilling; Oil and Gas Journal reported that "En Cana said Greater Sierra would be uneconomic without two technologies: horizontal drilling and underbalanced circulation" (Anon. 2002c).

Finally, horizontal drilling maximizes the amount of oil in place that can be extracted from underground reservoirs. Hawkings et al. (1990) reported that horizontal drilling would double the producible reserves from the Rotliegendes Field in Germany. According to Maloy (1992), horizontal drilling in the Austin Chalk "has conceivably increased recoverable reserves by 400 million BOE [barrels of oil equivalent, a measure

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allowing comparison of gas and oil production].” In the Elk Hills field in California, Gangle and Ezekwe (1995) concluded, “The horizontal wells produce at higher rates, lower drawdowns, and lower gas-oil ratio which will extend the life of the project and result in higher recovery.” Horizontal drilling has increased the recovery potential for this tilted reservoir to over 70% of the oil in place, an increase of 10 million barrels of producible oil per horizontal well (Gangle et al. 1991). For the Paradox formation of Utah, Arizona, and Colorado, Chidsey et al. (2002) reported, “Proper geological evaluation of the reservoirs may increase production by 20 to 50% by the application of horizontal, possibly multilateral drilling projects.” Deskins et al. (1995) predicted that horizontal drilling would increase U.S. producible reserves by 38%.

Directional Drilling Exploratory Wells

Based on industry reports, directional drilling is feasible for both exploration and full field development (French Oil and Gas Industry Association 1990). The effectiveness of horizontal drilling in particular as an exploration tool was noted by Hawkings et al (1990) who reported that a horizontal well was able to locate high permeability sands where conventional wells had failed.

THE POTENTIAL TO REDUCE IMPACTS THROUGH DIRECTIONAL DRILLING

Directional drilling, coupled with new well spacing patterns, can reform the way that the oil and gas industry does business. This is particularly important on public lands and on private lands overlaying federal minerals in the Rocky Mountain West, which must be managed for multiple uses. These tools have great potential to reduce damages from exploration wells, infill projects, and new full-field development. As a result, directional drilling technology should be considered in all pending and future oil and gas projects, and if found to be more environmentally beneficial, it should be implemented.

However, directional drilling is by no means an environmental panacea. When properly employed, these techniques can reduce the quantity of roads, well pads, pipelines, and overall surface impacts, and also concentrate human activity and vehicle traffic in a smaller area. But directional techniques do not eliminate these impacts, nor do they necessarily reduce other environmental impacts such as noise, some types of air pollution, chemical spills, and in the

case of coalbed methane, toxic wastewater. In order to truly minimize the environmental impacts when producing oil or gas, additional measures beyond the scope of this report will be required. In addition, directional drilling does not eliminate all impacts of oil and gas development, and in some cases merely shifts the impacts to other lands.

Consequently, directional drilling is not suitable for use in all instances. There are a number of sensitive lands and habitats that are fundamentally incompatible with industrial use, where oil and gas development of any kind is inappropriate. These lands include national wildlife refuges, parks, monuments, and wilderness areas; roadless and wilderness-quality lands; and other sensitive areas; as well as appropriate buffers around these lands.

Other sensitive lands, such as important wildlife habitat, areas of high archaeological and cultural interest, floodplains, and lands of critical importance to endangered and threatened species and other rare plants and wildlife, should be withdrawn from all surface developments to protect these sensitive lands from the surface impacts associated with energy development. Directional drilling has potential as a tool to access subsurface energy resources while protecting important surface values that would be damaged through conventional vertical drilling operations. It is directional drilling that allows for oil and gas to be extracted from federal lands with a “no surface occupancy” lease requirement.

However, environmental benefits can only be maximized if all surface activities, including exploration, are eliminated. The following paragraphs outline some of the potential environmental damage-reduction benefits of this technology.

Directional Drilling Requires Fewer Wells in Existing Fields

Because each horizontal well drains a much larger area than a vertical well does, fewer horizontal wells (and their associated roads, wellpads, pipelines, and in some cases, powerlines) are needed to drain a given oil or gas field. Maurer (1995) reported that Petro-Hunt used a single multibranch horizontal well to drain an entire lease; this dual wellbore produced at a rate that was 1.5 times greater than single-bore horizontal wells. For offshore drilling, Huang et al. (1996) reported, “In this application, the horizontal well can replace at least four vertical wells.” According to Al-Blehed et al.

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(2000), horizontal drilling has decreased the number of wells required to drain Middle Eastern reservoirs by 30%.

Because fewer directional wells are required to drain a subsurface reservoir, well spacing is greater for directional wells (Fritz et al. 1991). Joshi (1991) stated that “to achieve larger producible reserves, horizontal wells will have to be drilled with a larger well spacing than vertical wells.” In one full-field horizontal drilling scenario, Stright and Kobertson (1993) noted “It is also concluded that horizontal well spacing in the fractured Niobrara should be greater than 640 acres.” Indeed, horizontal wells that are spaced close together compete to draw the same oil or gas, reducing production efficiencies. In the Austin Chalk, Meehan (1995) found that “[i]nterference between [horizontal] wells more than 8,000 feet apart was not uncommon.” Thus, it would be foolish from a technical perspective to implement a directional drilling program with an ultra-dense (20- to 80-acre) well spacing pattern.

In existing oil and gas fields, horizontal and multilateral drilling allows additional production to occur without an increase in well density, by drilling from existing wells or well pads. The U.S. Department of Energy agrees, stating that “new techniques for sidetrack drilling (drilling a lateral extending from an existing wellbore) and deeper drilling from existing wells can allow some of these resources to be developed without drilling new wells or disturbing previously undisturbed areas” (USDOE 1999a). Horizontal infill drilling can utilize existing wellpads to produce additional resources with few added impacts.

Directional Drilling Extends the Reach of Drilling Operations

Extended-reach drilling is both practical and economical. Based on experience in offshore California fields, Elks and Masonheimer (2002) concluded that “[a]lmost any rig can drill ERD [extended-reach drilling] wells, when the wells are designed and engineered within the rig’s limitations.” In 1994, emerging technological advances allowed extended-reach wells in Australia’s Bass Strait field to be drilled “more economically and consistently” (Santostefano and Krepp 1994). The literature abounds with examples of technically and economically feasible “extended reach,” or long-distance directional drilling, in a variety of settings, as summarized in this report. Such extended-reach drilling provides the possibility for extracting

energy resources from under sensitive lands needing protection from surface disturbances. However, to date there are only a few examples where this has taken place. According to Deskins (1995), only 7% of the horizontal wells in a nationwide survey were drilled to avoid surface restrictions above the target formation. In Brazil, Petrobras has employed horizontal drilling in the Amazon to reduce the need to clear rainforest (Knott 1994). In this case, equipment was brought in by barge, and crews were helicoptered in, eliminating the construction of access roads to the wellpad. Slimhole drilling was used to access natural gas beneath the city of Howell, Michigan (Gredell and Benson 1995). In Texas, horizontal drilling was employed to access a large gas deposit beneath Falcon Reservoir, which was protected from surface drilling for ecological reasons (Doughtie 1994). These cases show that where surface resources require protection through lease stipulations or other measures, companies with a vested interest in a specific area may still be able to access the resource through directional drilling although this will displace impacts to other areas.

Cluster Drilling Reduces Surface Damage

Extended-reach drilling can be paired with cluster development to reduce the surface footprint associated with oil and gas drilling operations. Slant and conventional directional drilling was used to drill 23 shallow wells (ranging from 1,716 feet to 1,860 feet deep) from a single pad near Wolf Lake in northeastern Alberta (Smith and Edwards 1992). In Venezuela’s Orinoco Basin, Petrozuata has drilled up to 12 wells from a single pad (Moritis 2000). The Tabasco satellite field in the North Slope’s Kuparuk area has been produced entirely from 9 wells drilled from a single pad (Phillips Petroleum 2002). Foregoing sentence reinstated. Elsewhere on Alaska’s North Slope, a 25,000-acre reservoir was drained with 36 wells on two drilling pads (Redman 2002). The surface disturbance from the well pads, roads, and airstrip constructed during this project totaled 97 acres, compared to a total of 128 vertical well pads and 1,925 acres of surface disturbance for a comparable 25,000-acre part of Wyoming’s Moxa Arch field (data from BLM 1995). But it is important to note that such cluster drilling has been shown to cause caribou to abandon the critically important calving grounds (Nelleman and Cameron 1998).

Cluster drilling from a single well pad not only reduces the overall footprint of oil and gas

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development on the landscape by concentrating the activity and impacts of many wells at a few widely dispersed sites but also minimizes the capital investments of drilling companies (French Oil and Gas Industry Association 1990), and reduces costs for an expensive and ecologically damaging network of improved roadways. "By minimizing the number of production wells and usage of cluster locations," noted Graute et al. (1994), "a reduction of field investment and operating costs should be attained..." British Petroleum (2002) also has acknowledged the economic advantages of cluster development, stating that "limiting the size and number of new facilities also allows petroleum operations to be conducted more efficiently." Hub and cluster development is currently being used to develop the Tchibouela-Est field in Congo; this full-field production method is expected to improve production at reduced capital outlays (Energy Information Administration 2002).

By implementing cluster development in conjunction with directional drilling technology, there is the potential to simultaneously reduce environmental damages associated with full-field development using traditional vertical wells, as well as reduce industry costs. This provides an additional incentive for considering directional drilling, coupled with cluster development, when developing mineral resources in the Intermountain West.

CONCLUSIONS

This report demonstrates that directional drilling is a proven, feasible method to extract oil and gas resources in a variety of geologic settings throughout the Intermountain West and elsewhere across the globe. It is frequently economically superior to vertical drilling when the cost of drilling and the benefit from increased production associated with directional wells is taken into account.

Where directional drilling is undertaken in a localized area by clustering wells, the surface disturbance associated with the drilling activity can be reduced, compared to vertical drilling. Directional wells generally need wider spacing

within an area as well, which spreads out the amount of surface disturbance and may reduce the damage to any particular area. Thus, in a full-field development scenario, cluster drilling incurs a much more compact impact on the landscape when compared to the sprawl of roads, pipelines, and wellsites inherent to conventional vertical drilling. Directional drilling also enables oil and gas to be extracted from beneath lands where "No Surface Occupancy" restrictions have been placed to protect sensitive resources valued by the public.

Directional drilling will not prevent all environmental impacts of oil and gas exploration and development. While clustering operations reduce the overall amount of land disturbance, they do intensify impacts in localized drilling areas. Directional drilling technologies also will not address other impacts associated with oil and gas development, such as air pollution and chemical spills. As a result, lands that contain resources incompatible with oil and gas development should remain withdrawn from all types of drilling, with buffers established to protect these lands. Still other sensitive lands must be protected from the surface impacts of energy development.

Given the availability and utility of this technology, it should be considered as an alternative wherever the federal government is examining oil and gas development of publicly owned minerals in the Intermountain West. When found to be the more environmentally protective alternative, this technology should be required in the development of federal mineral resources.

Although the Bush Administration has lauded directional drilling for its potential to reduce environmental impacts, so far it has failed to implement or even study the widespread use of directional drilling technology. Directional drilling should be factored into every decision about oil and gas activity affecting the minerals owned and managed by the federal government in the West. It could be a replacement for vertical drilling in a variety of circumstances, from exploration wells to infill projects to full-scale development of new fields.

APPENDIX A

Other Means to Reduce Surface Impacts

Pitless Drilling

One method that is universally applicable to reduce **drilling impacts** is "pitless drilling," entailing closed-loop systems that recycle drilling mud rather than dumping it into open pits. In addition to the elimination of toxic waste pits on the surface, **this method** reduces wellfield truck **traffic** by up to 75%, reduces water consumption by 80%, and is **actually 8%** less costly than constructing and maintaining a reserve pit (Longwell and Hertzler 1997). This method **has** proven successful in Alaska (Phillips Petroleum 2002) and Colorado (Longwell and Hertzler 1997), and is planned for the Sakhalin I project in Russia (Sumrow 2002). Due to its environmental advantage, pitless drilling should be mandated as a standard requirement for drilling operations.

The Need to Reduce the Impact of Seismic Exploration

Seismic oil and gas exploration can also have serious environmental impacts. There are **two** main methods: vibroseis, which relies on heavy **equipment** to send vibrations through the Earth, and shot-hole method, which required setting off underground explosive charges. The resulting shock waves are recorded by geophones to produce an underground map of oil and gas deposits. Desert soils, particularly those with biological soil crusts, are acutely susceptible to compaction and destruction when subjected to off-road vehicle driving of the **type** that accompanies heavy-impact types of seismic exploration; these soils and crusts can **take 50-200** years to recover (Belnap 1995). Menkens and Anderson (1985) reported that prairie dog colonies subjected to vibroseis-method explor-



Photos by Scott Groene, Greater Yellowstone Coalition

Top: 26-ton vibroseis trucks used for heavy-impact seismic exploration.

Bottom: The aftermath of vibroseis truck use.

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ation showed population declines while neighboring colonies experienced population increases. Seismic exploration projects can also have impacts on big game, particularly in sensitive habitats. Both shot-hole and vibroseis methods have been shown to disturb and displace elk on winter ranges (Ward 1986). Seismic exploration can also cause elk to abandon preferred calving habitats (Gillin 1989). Shot-hole seismic projects, while less damaging to the land, may also have negative impacts on wildlife. Explosions from shot-hole seismic testing may injure or kill fish when the shots are placed too close to aquatic habitats (Yukon Fish and Wildlife Management Board 2002). When performed in the winter, seismic shots can disturb and cause stress to hibernating bears (Reynolds et al. 1983). For these reasons, seismic exploration projects also deserve special planning to minimize their impacts on lands and wildlife.

The most prevalent method, 3-D seismic exploration, can be accomplished through two distinct techniques. In both types of seismic work, strings of receivers called "geophones" are strung out along set patterns across the landscape to pick up vibration signals from artificial sources. "Vibroseis" techniques employ 56,000-pound trucks that lower a 6,000-pound vibrating pad to create the vibration. "Shot-hole" methods employ drilling shallow holes and setting off explosive charges to set up the vibration signals.

When properly conducted, this method can be a lower-impact alternative to vibroseis.

The vibroseis truck method is very heavy handed, requiring extensive off-road driving by massive machinery, which crushes vegetation and destroys fragile soils. According to the U.S. Bureau of Land Management, "Thumper trucks are obsolete technology that generate a greater shock wave through the ground and have the potential for greater impact to undiscovered cultural sites (due to the fact that they operated by dropping a 6,000 pound weight)" (BLM 2002b). Nonetheless, vibroseis trucks continue to be widely used throughout the American West.

The shot-hole method is much lighter on the land, particularly if it is performed without off-road vehicle travel. For environmentally sensitive areas, geophone cables can be laid by hand, and heliportable drills can be airlifted in to shot-hole sites (BLM 2001). This eliminates the need for damaging off-road truck and buggy traffic. Advances in shot-hole technology now allow 3-D seismic exploration to be conducted even in cities (Hansen 1993). Hansen later pointed out that exploration companies have a high degree of flexibility in locating shot points, increasing their ability to reduce impacts with this method (Hansen 1996). As in the case of drilling, some lands are so sensitive to disturbance that they are inappropriate for any type of seismic exploration.

APPENDIX B

Emerging Technologies Compatible with Directional Drilling

Virtually every technological advance developed for vertical drilling has also been successfully applied to directional drilling. For directional wells, these technological advances further improve the technical capabilities, increase oil and gas recovery, and lower drilling and production costs. As more advances are made in drilling technology, these methods will be able to access oil and gas from deeper reservoirs, farther from the drilling pad, and at lower costs per barrel produced than ever before.

Hydraulic Fracturing

Hydraulic fracturing has been successfully implemented with horizontal wells on any number of occasions (Yost and Overbey 1989, Salamy et al. 1991, Iverson et al. 1995, Soliman et al. 1996). Multiple hydraulic fractures have been successfully employed with very deep horizontal wells (Schuler and Santos 1996). Guo and Evans (1993) developed algorithms to predict production for horizontal wells with any combination of fracturing and oil or gas viscosity. Thus, for low-permeability (tight) reservoirs, the option of hydraulic fracturing is

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available to companies employing directional drilling technologies.

It is important to note that hydraulic fracturing is a controversial technique for gas extraction. Fracturing can have dramatic impacts on water supplies and nearby dwellings. These impacts, while outside the scope of this report, must be carefully considered before undertaking this approach.

Steam Injection

Steam injection can be used to improve heavy oil recovery from unconsolidated sand formations. Horizontal wells have been effectively employed in conjunction with steam injection from vertical wells (Chenot et al. 2002) and with paired horizontal injector wells (Sarma and Ono 1995). O'Rourke et al. (1997) found horizontal drilling of paired wells to be effective in gas production using steam injection techniques.

Underbalanced Drilling

In underbalanced drilling, drilling mud is infused with gas to make it lower-pressure than the producing formation. This prevents the drilling mud from being forced out from the wellbore into the reservoir formation, impairing the flow of gas into the wellbore (Teichrob 1994, Pinney and Rodrigues 1999). Brookey (1998) recently developed new drilling fluids using long-lasting "micro-bubbles," enabling balanced and underbalanced drilling fluids to be created at a fraction of the cost of injecting air or gas into drilling mud. Underbalanced drilling is particularly effective in producing oil and gas from low-pressure formations using horizontal drilling.

Well Casings

Originally, most horizontal wells were drilled as "open hole" completions, with no liner or casing of any type. Later, a number of different well casing types were developed for use with directional wells. Gomez et al. (2002) provide a useful synopsis of horizontal well casing types. According to this study, horizontal wellbores are most commonly completed in "open hole" fashion, or with slotted liners in unstable formations where wellbore collapse is a potential problem. Slotted-liner completions can be gravel packed to reduce sand production, which lowers efficiency. Gels can be used to isolate problem zones, even with slotted liners (Gomez et al. 2002). At the beginning of the 1990s, cased

horizontal wells in Alaska were being completed with either cemented or slotted liners (Stagg and Reilly 1990). These researchers noted that cement casings were being used to isolate problematic rock formations outside the pay zone. Thus, many different well casing options are available to drillers of horizontal wells.

Coiled Tube and Slimhole Drilling

Coiled-tube drilling replaces the segmented drill pipe of conventional drilling with flexible tubing. The coiled tubing is run under compression in order to maintain the necessary pressure on the drill bit (Faure et al. 1994a). According to Faure et al. (1994b), coiled tubing allows re-drilling old wells and performing horizontal re-entries, even in offshore situations where there is no derrick in place. Graham et al. (1999) extolled the advantages of coiled-tube drilling for drilling horizontal lateral sections from existing vertical wellbores: "Due to economic, environmental, and surface logistics concerns, re-entry drilling from existing wellbores is often an extremely viable solution to horizontal development in existing reservoirs. By utilizing an existing wellbore, many of the costs can be avoided and often troublesome formations are already secured behind casing,"

Coiled-tube methods have been paired with underbalanced drilling to achieve significant production improvements over vertical wells in a deep chalk reservoir in the Gorm Field of the Danish North Sea (Wodka et al. 1995) and also in the deep Elkton formation (McGregor et al. 1997). In addition, coiled-tube methods require a smaller wellpad and produce less toxic waste (Faure et al. 1994a) and are quieter than conventional drilling (USDOE 1999a).

Slimhole drilling, often accomplished through coiled-tube technology, entails the drilling of smaller-diameter wellbores, often from an existing vertical well. The new generation of smaller-diameter drilling bits developed for slimhole drilling are more durable, have increased penetration rates, and develop more power (McDonald et al. 1996). Slimhole drilling can also reduce wellpad footprint. According to the U.S. Department of Energy, "Operational footprints are also reduced, since equipment for slimhole drilling is smaller than that used in conventional operations. The area clewed for drilling locations and site access can be as little as 9,000 square feet with mud holding pits, as much as 75 percent less than that required for conventional drilling operations" (USDOE 1999a). Like coiled-tube drilling, slimhole

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drilling is quieter than conventional methods, reducing disturbance to local people or wildlife (USDOE 1999a).

A technique known as “microdrilling” is currently under development with the U.S. Department of Energy. This technique uses coiled-tube drilling from a trailer that can be pulled by a pickup truck, and can drill new wells up to 500 feet deep with no site preparation. According to the U.S. Department of Energy (1999b), “When developed for deep drilling, the technology will replace traditional methods that use massive amounts of equipment, material, and manpower, all of which are extremely expensive.” This technique may allow drilling to occur without additional well pad construction.

Waterfloods and Miscible Floods

Oil and gas producers may use waterfloods and miscible floods to increase reservoir production; these methods entail the injection of water or solvent to raise reservoir pressure and force oil or gas out through producing wells. These methods are typically employed in a coordinated fashion over entire reservoirs to maximize the production of oil or gas. Horizontal wells enhance the effectiveness of waterfloods through maximizing the “sweep efficiency,” or ability to force more oil out of the reservoir (Aalund and Rappold 1993, Deskins et al. 1995).

Cases abound regarding the successful pairing of horizontal drilling with waterfloods and miscible flood. The combination of waterfloods and horizontal drilling has achieved success in Utah (Hall 1998). With miscible floods, horizontal wells in Canada’s Rainbow Keg River G Pool achieved 3.5 times the hydrocarbon production of the best vertical well in the pool (Sarma and Ono 1995). In addition, the drilling of horizontal wells actually improved the productivity of offset vertical wells for miscible floods in the Rainbow Keg River E Pool (Fong et al. 1996). The cost of these horizontal wells in this pool as well as similar miscible flood horizontal projects in the Brazeau River field were recovered within the first year of production (Sarma and Ono 1995). Miscible floods have also been effectively employed in conjunction with cluster drilling on Alaska’s North Slope (Redman 2002).

Rotary Steerable Drill Bits

Rotary steerable drill bits can change direction on a dime and offer faster drilling through the rock than older directional systems. In the Norwegian North Sea, a rotary steerable system drilled through 8,586 feet of horizontal reservoir section in only 8.9 days, saving the rig operator \$1 million in rig time (Gaddy 1999). Similarly, rotary drilling systems saved 100 days of rig time (and the associated costs) in Norway’s North Sea Jotun Field (Grini et al. 2002). Grini et al. noted that “Rotary-steerable systems provided greater directional-steering accuracy and drilling efficiency in extended-reach drilling applications.” Most importantly, rotary steerable technology holds the promise of increasing extended reach distances by 25% over current achievements (Sumrow 2002).

But there are limitations to rotary-steerable technology. Chenot et al. (2002) reported that unconsolidated sands were poor candidates for rotary steerable drilling after a well failed in this formation where a conventional horizontal well was successful. Rotary-steerable systems remain an expensive option at the current time. Sumrow (2002) noted, “Anecdotally, only about 15% of the rigs in the North Sea can afford to run rotary steerable systems, limiting rotary steerable technology to only the more expensive wells.” But if rotary-steerable technologies follow the trends of other advances in petroleum engineering, costs may soon decrease to the point where this technology is economically feasible for a broad range of applications.

Other Emerging Technologies

A host of other technologies have arisen to increase the productivity or economic efficiency of directional drilling. Ali et al. (1996) developed an acid foam treatment to repair “skin damage” problems for open-hole wells in unconsolidated sands. Miller and Geehan (1998) also found that acid stimulation improved production in under-producing horizontal wells in carbonate formations. A plunger lift has been developed specifically for use in removing liquids from horizontal wellbores (Pullin and Porter 2001). Mathematical algorithms to predict bit walk in diagonal, directional, and horizontal wells have been developed to achieve even greater accuracy in drilling (Liu and Zaihong 2002). All of these technologies improve the performance of directional wells and increase their cost effectiveness.

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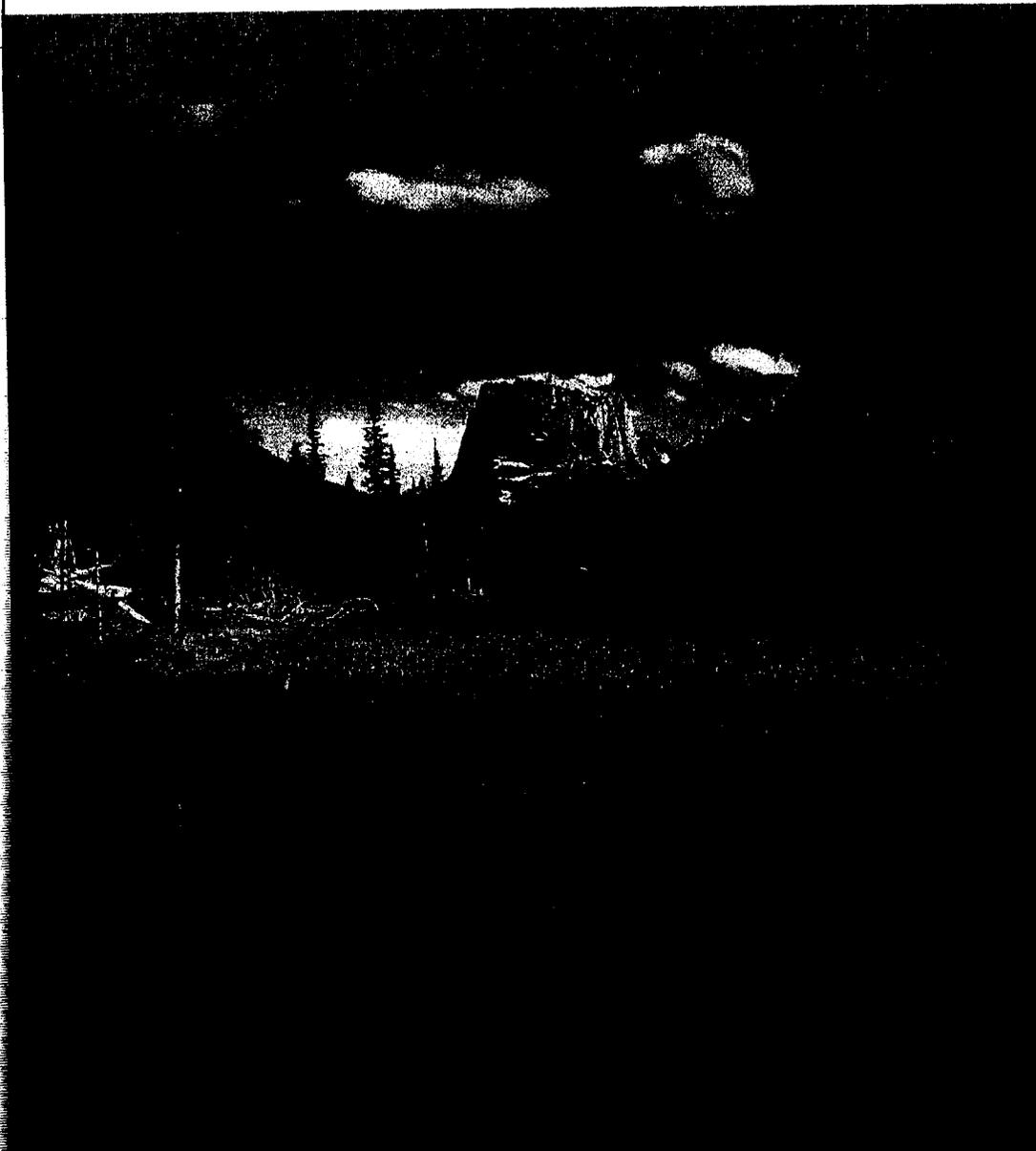
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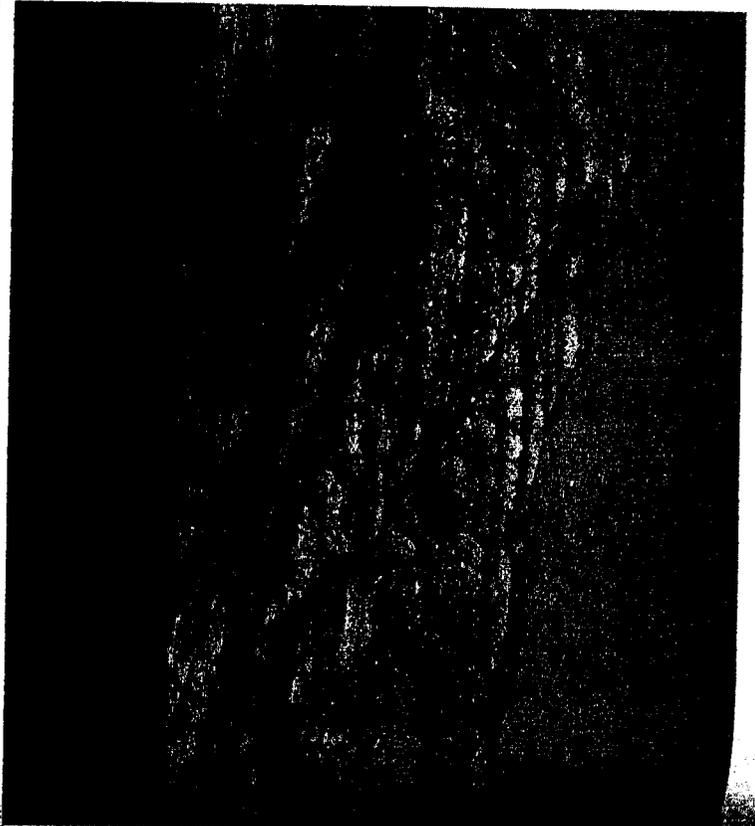
GUIDE

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Erik Molvar

WILD Wyoming





Big and buttes typical of Fortification Creek

ACCESS: There is no public access to this area, despite its size and importance to hunters. You can take the Kingsbury Road north from I-90 to link up with the Fortification Road, which approaches its south boundary. The Echeita Road follows the railway and approaches to within 3 miles of the WSA. From here, access is contingent on landowner permission. The BLM is currently negotiating a public access corridor along this route.

South Fork of Powder River

Location: 35 miles northwest of Casper, Wyoming, 2,900 acres.

Administration: BLM (Casper Field Office).

Current status: Unprotected roadless lands.

Vegetation: Great Plains Shortgrass Prairie Province, wheatgrass-needlegrass shrub steppe. **Altitude range:** 5,300 feet to 6,380 feet.

Recreation: None.

Minimum core to perimeter distance: 1.7 miles.

Best uses: Horseback riding, hiking, big game and upland bird hunting, rockhounding.

Season: April–October.

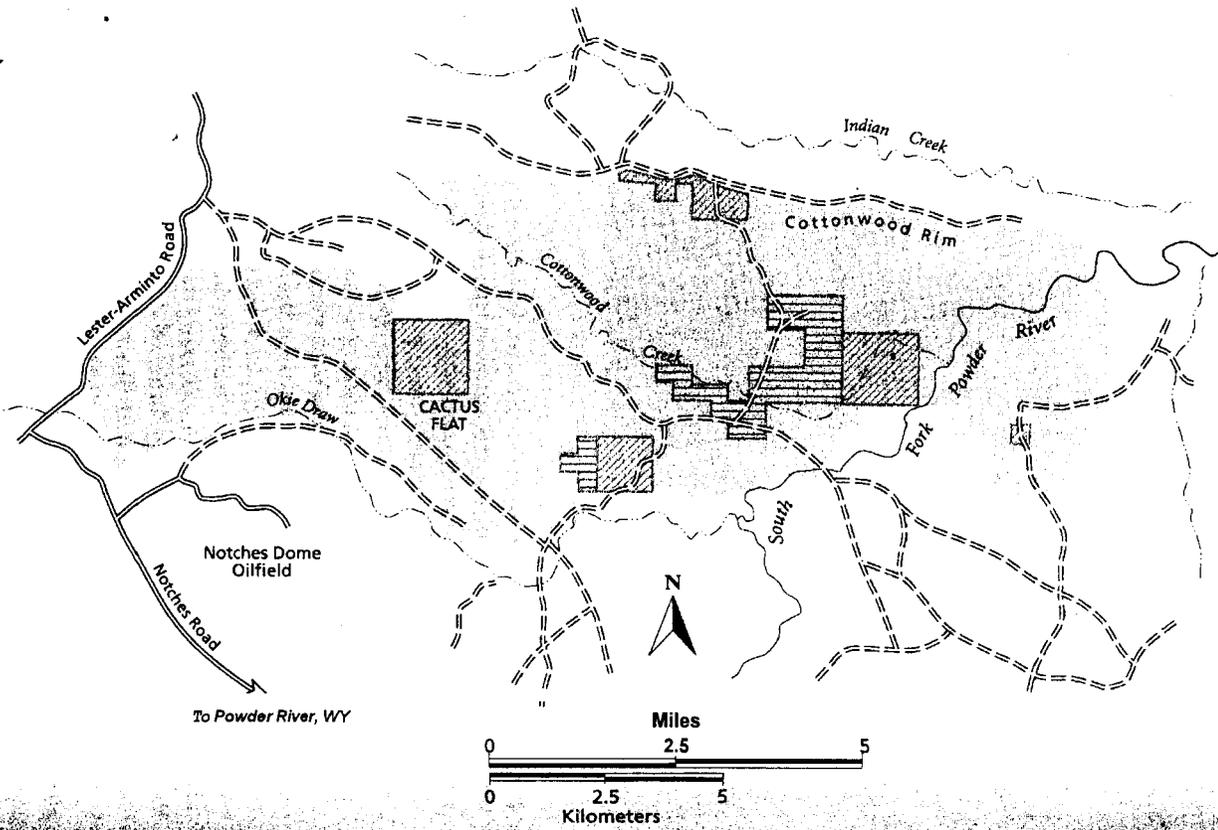
Acquisition: site and Midwest 1:100,000.

TRAVELERS ADVISORY:
FLASH FLOODS, BAD WATER

Open country near the headwaters of the Powder River's south fork is up of clay buttes and tablelands dissected by broad coulees, with some badland features to the east of Cottonwood Creek. It is dominated by islands of big bluestem and blue grama. Cheatgrass, an annual invader comes over following overgrazing, forms extensive swaths in the riparian along with sagebrush and greasewood. A series of sandstone hills rises the western edge of the roadless area, wooded loosely in juniper, ponderosa pine, and limber pine. This is an area of rock hoodoos and miniature gullies carved out by intermittent streams.

This area is a summer range for pronghorn antelope, and mule deer can be seen along the wooded margins and in the badlands. Prairie falcons and golden-crowned kinglets are also common residents. A few old fencelines and vehicle tracks are scattered across the area, but they do not detract from its wild character. There has been oil development along the sandstone domes farther west, and there is some possibility of future oil development within the roadless area. Cattle and sheep have grazed this area for over a century, and the area would continue if the area is granted wilderness status.

RECREATION USES: This open country is ideal for unconfined horse travel, and offers a real feeling of the old west. Hiking and backpacking are also easy



ains buttes guard Cottonwood Creek

is the open grasslands, but there are no supplies of good water. Rockhounds search the dry washes for interesting finds. There is fine potential for big game and upland bird hunting here, with antelope being especially prevalent.

Access: The western edge of the roadless area can be accessed from the town of Powder River via the gravel Notches Road or the Lester-Arminio Road. To the east, the area can be accessed by traveling west from the Twentythree Road near Merino.

Hike

Cottonwood Notch

Distance: 11.7 miles round trip.

Difficulty: Easy.

Starting and minimum elevation: 5,900 feet, 5,520 feet.

Map: Notches Dome, Cave Gulch Reservoir.

Directions: Drive west from Casper on US 20 to the settlement of Powder River, then north on County 106. Follow this gravel trunk road for 6 miles, then go straight at the first junction and continue another 7.4 miles. Turn right on the gravel road just beyond the first hoodoo. Follow this graded but potholed road 1.2 miles, then swing left onto a gravel road. Bear right at the first split and left at the second to park atop a promontory between two small canyons.

This off-trail hike visits small, rocky canyons and vast grasslands where buttes and scarps swell from the lowlands. To begin the trek, drop northward into a low canyon of Okie Draw and follow it east until it emerges from the hillside. When gentler slopes appear, ascend onto the tableland to the north and follow along its rim. Note the unusual buttes to the south, demarcating the edge of the Norches Dome. You will pass through several fence gates and beneath a telephone line before an old jeep trail leads down to Cactus Flat.

Follow the northern edge of the flat to a fence line and follow it east to reach a gate. After passing through, you will have entered the vast and trackless reaches of the South Fork highlands. Bear east for a notch in the flatland ahead, crossing several clay-banked washes beyond Cactus Flat. Hike into the notch to meet an old jeep track, then follow it north along the bench tops for fine views of the Cottonwood Creek basin and the dissected buttes beyond. Then return westward along the rims to complete the trek.

Creek Buttes Complex



Location: 15 miles east of Bill, Wyoming.

Size: 960 acres in 3 units.

Administration: Thunder Basin National Grassland.

Management: Unprotected primitive area.

Ecology: Great Plains Shortgrass Prairie ecosystem, wheatgrass-needlegrass grassland.

Altitude range: 4,500 feet to 4,900 feet.

Vegetation: None.

Distance to perimeter: 1.9 miles.

Activities: Horseback riding, hiking, bird watching, hunting.

Best time to visit: March–May, September–November.

Map: Thunder Basin National Grassland Map; Bill and Lance Creek 1:100,000.

TRAVELERS ADVISORY:

FLASH FLOODS, SUDDEN STORMS

to find a stretch of High Plains grassland open to the public that remains essentially wild state. The Thunder Basin National Grassland has, in a program of land swaps, cobbled together a few such tracts of prairie island. The Great Plains call to mind images of featureless flatlands and wastes. But far from being a low, flat expanse, the prairies of the Thunder Basin rise in undulating swells, punctuated by odd buttes and collections of wooded mesas.

A remote corner of Wyoming has always been sparsely populated. A few ranchers tried their luck at dry-land farming and small-time ranching in the turn of the century, but homestead allotments were too small for them and the climate was too dry for farming. The last of the settlers were gone during the Dust Bowl years of the 1930s, and the federal government bought the area to homestead. In the 1960s, these empty prairies were given over to the Forest Service for management as the Thunder Basin National Grassland.

Remnants of uplands in the heart of the Thunder Basin National Grassland remain in a primitive state. Isolated among tracts of private ranch lands, these areas have been largely protected from motorized intrusions by their remoteness and difficulty of legal access. The Miller Hills is the northernmost unit, a

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A Regional Guidebook for Applying the Hydrogeomorphic Approach to Assessing Wetland Functions of Riverine Floodplains in the Northern Rocky Mountains

F. Richard Hauer, Bradley J. Cook, Michael C. Gilbert,
Ellis J. Clairain, Jr., and R. Daniel Smith

August 2002



FHWA



USDA NRCS
Natural Resources Conservation Service



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August 11, 2003

Ms. Linda Sloan
BLM-Casper Field Office
2987 Prospector Drive
Casper, Wyoming 82604

RE: Casper Resource Management Plan Revision Scoping

Dear Ms Sloan:

Anadarko Petroleum Corporation (APC) appreciates the opportunity to respond to the notice to prepare an Environmental Impact Statement (EIS) for the Casper Resource Management Plan (RMP). APC and its subsidiaries have considerable interests in the proposed analysis area that may be affected by the outcome of this planning effort. Following are the issues and comments that we have identified. APC respectfully requests that these issues and concerns be fully addressed in the EIS.

Lands in the Casper Field Office management area are significant in their potential for development of oil and gas resources. In addition, oil and gas activities are highly important factors in local and Wyoming state economies. BLM must ensure that a thorough examination of the opportunities for future development of oil and gas occurs and that any restrictions placed on development are fully warranted.

Fluid Mineral Planning:

BLM's Supplemental Program Guidance (SPG) for Fluid Minerals (BLM Manual 1624) requires that BLM give consideration to mineral resources in the planning process. In addition, it specifies that mineral resources are on a level equal with all other resource values. Equity is as important in selecting the planning criteria as it is in the consideration of alternatives, addressing the effects in environmental consequence analyses and in determinations used to select a preferred alternative. BLM should ensure that oil and gas resources are represented on equal footing with other resources throughout the planning process.

Use of Reasonable Development Scenario (RFD) in Impact Analysis:

APC believes that BLM should consider using "net acreage of disturbance" by oil and gas operations as the most appropriate impact assessment factor in its analysis. APC believe that use of a reasonably foreseeable development (RFD) scenario with a total number of wells does not provide an accurate basis for the assessment of potential impacts. Use of net acreage disturbance does and accounts for the modern, on-the-ground realities associated with oil and gas activities.

As an example, utilization of the total anticipated number of wells, as a measurement standard does not take into consideration the reclamation of plugged and abandoned wells, which is conducted in accordance with applicable environmental regulations, returning the area to its natural state. These non-producing wells are sealed off or plugged to prevent impacts on the environment. The drill site and access route are re-contoured, reclaimed and replanted as required. BLM should take into consideration the actual surface conditions associated with development by analyzing a net effect of surface activities and then defining an acceptable range of allowable surface disturbance. In this manner, BLM would not bind itself to a projected "number of wells allowed" but rather would regulate the "net effect" on disturbance to the surface, providing incentive for environmentally sound and timely reclamation and surface management.

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Furthermore, BLM should rely upon historic figures for determining average acreage disturbance per well location or mile of linear facilities.

Fluid Mineral Analysis:

The following should be examined in the planning effort:

- Management options that would protect or enhance opportunities to explore for and develop oil and gas resources;
- Application of reasonable mitigation measures (least restrictive that is necessary) designed to limit or avoid demonstrated impacts to surface resources access;
- Allowance for application of new information, technology or economic conditions on lands with unknown, low and moderate oil and gas potential. Management of these lands should be in a manner that permits future exploration and production activities, should the new information, technology or economic conditions support such activities;
- Effects on opportunities to lease explore and develop oil and gas resources resulting from restrictive surface management decisions;
- Limiting imposition of stipulations to remaining effects that may be present after application of standard lease terms and conditions. For example, under the 43 CFR 3101 regulations, a two-month occupancy restriction can be imposed under standard terms and conditions of a lease to protect critical habitat. Therefore, if the typical restriction used to protect calving areas is two months, no stipulation is needed because the BLM has the authority to restrict an operator, if necessary, to protect such areas under the standard terms of the lease. A lease notice apprising the lessee that calving grounds exist on the lease should be sufficient;
- The effect of surface resource management decisions on future subsurface development opportunities and activities. Reduced access to public lands for purposes of exploring for and producing oil and gas resources should be considered a separate issue from economic impacts;
- Socio-economic benefits of oil and gas development activities indicating the cost of administering the mineral program and industry's financial contributions to Wyoming schools, local, state and federal treasuries; and
- BLM must not make assumptions that industry can directional drill in any situation. Directional drilling is most commonly used for field development and not exploration activities. Directional drilling is expensive and difficult. Consideration of directional drilling as a mitigation tool is inappropriate for planning level analyses. Informational needs such as, increased costs of drilling and production, effect of increased costs on resource recovery, technical limitations (interplay of well depth, well spacing and target zones), technical abilities (e.g. extent of lateral distances achievable), and risks (both economic and well integrity) are only available at the development proposal stage. Any discussion of directional drilling should be limited to a discussion of the assessment factors that may be used when addressing directional drilling alternatives in project level documents.

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Additionally, an account of the costs that stipulations, mitigating measures and restrictive policies impose on industry projects should be included, along with the concomitant economic impact to the state of Wyoming and local governments of reduced revenues. For instance, seasonal restrictions in SW Wyoming may have already impacted the market for many of the services (dirt construction, wireline services, fracing services, etc.) that the oil and gas industry relies upon. Such an impact is likely to occur due to the narrow "window of opportunity" for drilling created by seasonal restrictions. While demand for such services could be equally spread throughout a year, widespread seasonal restrictions create an artificial increased demand during the window and a resultant increase in the price to obtain these services during that time period. Other aspects to consider could include; impacts on employment, delays in bringing production on line, and added costs for facilities.

Standards and Guidelines for Oil and Gas

Section 1502 of the Council on Environmental Quality Regulations on the National Environmental Policy Act directs that mitigation measures be identified in an EIS which may be employed to reduce or entirely avoid impacts to other resource values. While this could be construed to mean that only lease stipulations need to be identified, we believe it is necessary to discuss other types of mitigation which may be utilized at the time of oil and gas drilling, both exploration and development, such as area-wide standards and guidelines for oil and gas operations. This information is necessary because it illustrates that with appropriate mitigation, oil and gas activities are compatible with other resource uses, including those in sensitive areas.

Interim development during the planning process

According to IM-2001-191:

"When a RMP is being amended or revised, BLM will continue to process site-specific permits, sundry notices, and related authorizations on existing leases in an expeditious manner while ensuring compliance with NEPA and other laws, regulations, and policies.

"The BLM has the authority and discretion to condition its approval of proposed actions with reasonable measures (including relocation, redesign or delays in the proposed action) so as to reduce the effect of actions on other resource values and uses, consistent with the lease rights granted (see 43 CFR 3101.12). That is, BLM can use its authority and discretion to condition its approval of proposed actions to not constrain alternatives under consideration in a RMP revision or amendment consistent with the lease rights granted. Actions that may appear to reduce a lessee's right to reasonably develop a lease should be cleared through the State Director and Regional Solicitor's Office."

During ongoing efforts to amend the RMP, BLM should use its authority and discretion appropriately to avoid undue delays in permitting oil and gas activities.

Additionally, APC requests that the planning effort for the Casper RMP not result in a disallowance for interim drilling in instances where the existing RFD "number of wells" would be exceeded. For example, if a proposal is submitted for 300 wells and the RMP will still allow for 150 additional wells, then the Casper FO should approve 150 wells rather than denying the whole project.

Monitoring and Lease Stipulation Effectiveness and Limits on Development

The revised RMP must assure that BLM will have a program in place to monitor the effectiveness of stipulations and conditions of approval (COA). Is each stipulation or COA doing the job it was

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intended to do? Do they go too far or not far enough? Have anticipated impacts occurred at the level analyzed? Since planning is so times consuming, it is extremely important for BLM to be able to determine, well in advance, if predicted impacts associated with oil and gas development are close to being met.

In a similar fashion, other resource (i.e. grazing, mining, climate, vegetation management, wildlife management, air/water quality etc.) monitoring must occur simultaneously to ensure that sufficient information is available to determine causation of impacts. BLM must be clear in the RMP of its monitoring objectives, criteria and timeframes, and BLM's responsibility for such monitoring efforts.

Additionally, BLM employs any number of parameters or limits on development to make comparison of impacts among any number of alternatives analyzed. The RMP/EIS should make it clear that these analysis parameters (i.e. well numbers, total long term acreage disturbances, etc.) are merely tools for comparison of alternatives and not strict limits on development. To be more precise, once monitoring indicates that those limits will soon be reached it is a signal to BLM that additional analysis and possible revisions to the RMP need to be considered. In any case, development will be allowed to occur during revisions.

By employing the above principles BLM can have ample opportunity to initiate new planning efforts, if needed, and determine the effectiveness of mitigation measures while ensuring long term continuance and certainty of oil and gas development in accordance with planning decisions.

Valid Existing Rights

Valid existing lease rights cannot be changed by a new plan. Voluntary compliance to the new plan may be sought from lessees if activities are initiated. Nevertheless, BLM needs to specify in the planning documents if and how valid existing lease rights could be impacted by the new leasing decisions. Specifically, potential conditions of approval for operations and other changes should be identified.

Leasing vs. Recreation Opportunities

It is important to recognize that oil and gas exploration and development activities are fully compatible with semi-primitive recreational values and opportunities. The oil and gas industry has demonstrated repeatedly its ability to operate in sensitive areas with minimum effects on other resource values.

A decision to further remove lands from the constantly diminishing multiple-use land base would have a detrimental impact on local economic opportunities and welfare. Consequently, APC would necessarily strongly object to a no-lease or no-surface occupancy stipulation decision for areas allocated to semi-primitive recreation.

Geophysical Exploration

BLM should strongly promote geophysical activities throughout the planning area. Geophysical operations are perhaps the most adaptable and environmentally friendly exploration activity. Past experience on BLM lands have proven that geophysical activities can be adapted to protect wilderness values and the most sensitive wildlife values. Seismic exploration is of great value in deciding where not to drill thereby eliminating unnecessary surface disturbances associated with drilling. There is simply no reason to disallow the benefits that can be obtained from conducting geophysical activities across the entire planning area.

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Coal Bed Methane Water Disposal

BLM should ensure that all possible methods for handling coal bed methane produced water are addressed in the RMP. A toolbox of methods for dealing with produced waters should be included; such as off-channel reservoirs, closed basins, surface discharge, treatment with surface discharge and a clear recognition of the role of the Wyoming Department of Environmental Quality.

Visual Resource Management

BLM states that it is their responsibility to ensure that the scenic values of public lands are considered before allowing uses that may have negative visual impacts. While Anadarko understands BLM's responsibility for visual resource management (VRM) we are concerned that some entities are attempting to use VRM as a tool to preclude other resource development either at the planning stage or when reviewing project proposals. BLM should make it clear that visual resource management decisions are on an equal footing with other resource considerations.

Management decisions for the various Visual Resource Management inventory classification identified in the RMP must give consideration to other factors such as recreational user days, mineral development potential, management and presence of other existing resource uses. VRM is a resource allocation process that should occur in concert with and not contrary to allowances for other resource uses.

Energy Impact Analysis for All Alternatives

The National Energy Policy and Executive Order 13211 directs federal agencies to fully consider potential adverse impacts of their decisions on the President's National Energy Policy and issue a statement of adverse energy impact. In order to fully disclose the impacts of various EIS alternatives BLM should prepare a "Statement of Adverse Energy Impact" for each alternative analyzed.

Private Lands

BLM needs to ensure the rights of private land owners are adequately accounted for in the RMP/EIS. This is a significant issue that must be addressed at the planning stage. While BLM does have the mandate through NEPA to analyze for cumulative effects of proposed actions, it does not give the agency authority to manage private property. For instance, cultural and historic resources are the property of landowners. Often, projects on BLM lands are interrelated and/or interconnected with activities on private lands. BLM should not attempt to gain regulatory authority on private lands through a strained application of the NEPA process. BLM's responsibility is to analyze the potential impact of the proposed activity on private land; however, this does not mean that BLM can or should dictate what activities are conducted on private lands.

BLM must also recognize the differences between management of recognized threatened and endangered species under the Endangered Species Act (ESA) and sensitive species. APC recognizes BLM's and the FWS's authority under the ESA to require clearance surveys for federal surface and where private surface/federal minerals exist, however, that authority does not extend to sensitive species. Any discussion of potential stipulations regarding non-ESA species must recognize BLM's lack of authority to enforce the stipulations on private property. Although APC will work with landowners to ensure that its activities are conducted in an environmentally sensitive manner, should a landowner insist on allowing activity to occur that would affect habitat of non-ESA species BLM must concur. Nor does BLM have the authority to condition approval of a permit by requiring a permittee to conduct non-ESA wildlife studies/surveys on private property.

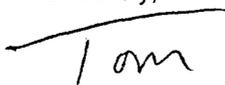
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Any requests for such surveys by the BLM must recognize that the landowner has the ultimate authority to agree or not to such surveys.

Historic Trails

The existing RMP decisions regarding protection measures for National Historic Trails should remain in effect until such time that Wyoming Historic Trail Management Plan is completed, subject to public review, and amended into the new RMP.

Sincerely,



Tom Clayson

08 AUG 13 11:10 AM '03
BLM



NATIONAL TRUST
for HISTORIC PRESERVATION™

August 26, 2003

CSL-0003
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RES ENG. SVC.
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VIA FAX (307) 261-7587 AND MAIL

Mr. Jim Murkin
Field Manager, Casper Field Office
Bureau of Land Management
2987 Prospector Drive
Casper, Wyoming 82604

Re: Scoping Comments for the Revision of the Platte River Resource Management Plan and Associated Environmental Impact Statement

Dear Mr. Murkin:

On behalf of the National Trust for Historic Preservation (National Trust), we appreciate the opportunity to submit these scoping comments regarding Bureau of Land Management's (BLM) notice of intent to revise the Platte River Resource Management Plan and prepare an associated environmental impact statement to be named the Casper RMP (Casper RMP). These scoping comments are intended to outline cultural and historic issues which BLM needs to address in the revised Casper RMP.

Interests of the National Trust. The National Trust has a strong interest in the preservation of our nation's historic resources. Congress chartered the National Trust in 1949 as a private charitable, educational, and nonprofit organization to facilitate public participation in the preservation of our nation's heritage and culture, and to further the purposes of federal historic preservation laws. 16 U.S.C. §§ 461, 468. In addition to our headquarters in Washington, D.C., the National Trust operates seven regional and field offices throughout the country, including our Mountains-Plains Office in Denver, as well as 23 historic sites open to the public. With the strong support of our 200,000 members around the country, including 260 members in Wyoming, the National Trust works to protect significant historic places and to advocate historic preservation as a fundamental value in programs and policies at all levels of government.

General Concerns

The National Trust believes that BLM should be taking substantially greater responsibility for evaluating and protecting cultural and historic resources. BLM manages the largest and most diverse inventory of cultural resources of any federal agency. The Casper field area has a number of highly significant cultural, historical, and archeological resources, including the Oregon/Mormon National Historic Trail. Of significant importance is the Cedar Ridge-Badwater Creek area, determined to be eligible for the National Register of Historic

Protecting the Irreplaceable



Mr. Jim Murkin
Bureau of Land Management
August 26, 2003
Page 2

Places as a traditional cultural property (TCP). In addition, the Casper area contains many historic resources that have not yet been identified, and whose potential significance and eligibility for the National Register have not yet been evaluated. Because they are unidentified or unevaluated, these resources are likely to be the most vulnerable to unintended adverse impacts unless they are fully considered in the planning process. The RMP revision provides an excellent opportunity for BLM to proactively survey, evaluate, and protect these invaluable and irreplaceable cultural and historic resources.

Management decisions in the planning process should consider the broader implications of designated uses. We believe the RMP should outline proactive measures to protect cultural and historic resources from mineral development, and should examine how BLM can fulfill its stewardship responsibilities and incorporate specific management plans into each of the alternatives depending on the designated activities. Given this, we believe that outlining the issues and potential areas of interest at the outset of the resource management planning process enhance BLM's ability to develop an effective RMP.

The following comments outline our concerns and provide specific recommendations for developing an appropriate RMP:

1. **BLM Should Engage in Consultation with Indian Tribes Early in the Planning Process**

BLM should engage in consultation with Indian tribes early in the RMP process as required by the National Historic Preservation Act (NHPA), the Federal Land Policy and Management Act (FLPMA), and other statutes, policies and procedures. FLPMA requires Federal agencies to "coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of. . . Indian tribes by, among other things, considering the policies of approved State and tribal land resource management programs." 43 U.S.C. § 1712(c)(9). Under the NHPA, tribal consultation is necessary to identify "traditional cultural properties" and other religious and cultural values within a land management area during the planning process. See 16 U.S.C. § 470a(d)(6)(B); see also National Register Bulletin No. 38.

BLM's handbook on tribal consultation best describes why early consultation is necessary – "to assure that tribal governments, Native American communities, and individuals whose interests might be affected have a sufficient opportunity for productive participation in BLM planning and resource management decision making." BLM, H-8160-1 – General Procedural Guidance for Native American Consultation, I.A. (released 11/03/94) [hereinafter Native American Handbook]. The handbook also recognizes that conventional NEPA and NHPA analyses "generally do not appropriately address the consequences felt by Native American practitioners." Id. at II.D.

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 Bureau of Land Management
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As the Native American Handbook further points out, consultation requirements include a “good faith effort to elicit specific kinds of information.” BLM cannot assume that a failure to respond to an inquiry letter indicates that the tribe is not concerned. Native American Handbook at III.A; see also Pueblo of Sandia v. United States, 50 F.3d 856 (10th Cir. 1995). Effective consultation is important because Native American interests can only be dealt with through the consultation process. The handbook states that consultation is necessary because:

Native American issues and concerns, although associated with BLM lands and resources, are based on intangible values. Intangible values are not amenable to ‘mitigation’ in the same way that a mitigation strategy can be used to address damage to, or loss of, physical resources.

Native American Handbook at II.

Actual mitigation of adverse impacts on cultural and historic resources might be effective at the time of planning specific projects to satisfy Section 106 of the NHPA. However, the BLM recognizes that

[s]trategies to reduce proposed Federal actions’ impacts, or proposed undertakings’ effects, generally follow models related to [NEPA], the [NHPA], and their implementing regulations (40 CFR Parts 1500-1508 and 36 CFR Part 800). Where Native American cultural and religious concerns are involved, however, conventional methods of mitigation generally do not appropriately address the consequences felt by Native American practitioners.

Native American Handbook at II.D (emphasis added). Therefore, it is critical that BLM adequately solicit information from potentially affected Native American tribes, and more importantly, provide them with sufficient information about the project to identify areas of traditional cultural and religious significance. Failure to provide Native American tribes with an adequate opportunity to raise their legitimate concerns would mean that the RMP process is deficient.

Recommendations:

- ◆ Make a “reasonable and good faith effort” to consult with Native American tribes located in and around southwestern Wyoming, as well as tribes known to have a historical connection to the area;
- ◆ Adhere to federal laws and agency policies regarding consultation with tribes;
- ◆ Request information about areas with potential religious or cultural significance to Indian tribes;

Mr. Jim Murkin
 Bureau of Land Management
 August 26, 2003
 Page 4

- ◆ Allow Indian tribes who are interested in the RMP process an adequate opportunity to engage in consultation and provide information; and
- ◆ Ensure that areas identified as having religious or cultural significance to Indian tribes, including the Cedar Ridge-Badwater Creek TCP, are carefully considered in the RMP process, and that adequate protection for these resources is integrated into the RMP.

2. **BLM Should Integrate Compliance with Section 110 of the NHPA, and President Bush's "Preserve America" Executive Order, into the RMP Process.**

Federal legislation and executive orders emphasize the importance of cultural and historic preservation as a national policy. For example, the National Historic Preservation Act affirms that "the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people," and that "the preservation of this irreplaceable heritage is in the public interest so that its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans." 16 U.S.C. §470(b)(2), (4).

BLM's stewardship responsibilities for historic properties are defined in Section 110 of the NHPA. Among other things, Section 110 requires BLM to locate, inventory, and nominate properties to the National Register, as well as to assume responsibility for preserving historic properties under its ownership or control. *Id.* § 470h-2(a).

BLM should take proactive steps to comply with the mandates of Section 110 of the NHPA, identifying within the RMP how BLM intends to comply with its stewardship responsibilities, especially when considering the impacts that other potential uses within the area may have on historic and cultural resources.

More recently, President Bush has strengthened the stewardship responsibilities of federal agencies. On March 3, 2003, he signed Executive Order 13287, entitled "Preserve America," which requires each federal agency to "prepare an assessment of the current status of its inventory of historic properties," expanding on the requirement found in section 110(a)(2) of the NHPA. Exec. Order 13287 § 3; *see* 16 U.S.C. § 470(h)-2(a)(2). Additionally, the President has required each agency to "ensure that the management of historic properties in its ownership is conducted in a manner that promotes the long-term preservation and use of those properties." Exec. Order 13287 § 4. Accordingly, the RMP should take stronger steps to ensure that all designated uses comply not only with the NHPA, but also with the mandates of President Bush's proactive stewardship agenda.

Mr. Jim Murkin
 Bureau of Land Management
 August 26, 2003
 Page 5

Recommendations:

BLM should:

- ◆ Integrate President Bush's "Preserve America" stewardship mandates into the RMP;
- ◆ Integrate Section 110 of the NHPA into the RMP process by identifying, evaluating, and nominating properties to the National Register;
- ◆ Adopt specific measures to protect cultural resources from artifact collectors, looters, and vandals;
- ◆ Ensure that allowed uses within the area will not diminish BLM's ability to identify and protect historic properties in the future; and
- ◆ Nominate the Cedar Ridge-Badwater Creek area to the National Register of Historic Places as a traditional cultural property;
- ◆ Manage the Cedar Ridge-Badwater Creek area as a Special Management Area to ensure adequate protection;
- ◆ Adopt "No Surface Occupancy" restrictions and additional necessary stipulations for Leases, including closing sensitive areas to leasing altogether, in order to avoid and minimize potential adverse effects on cultural and historic properties.

3. Adequately Integrate FLPMA's Multiple-Use Mandates Into the RMP Process

FLPMA requires BLM to establish land use plans that consider a combination of "multiple uses." 43 U.S.C. § 1701 et seq. However, BLM must manage the "public lands in a manner that will protect the quality of historical and archaeological values." *Id.* § 1701(a)(8). A determination of designated uses is not based on "the greatest economic return or the greatest unit output." *Id.* § 1702(c). Instead, FLPMA requires a "systematic interdisciplinary approach" as a method for achieving a combination of multiple uses. *Id.* § 1712(c)(1). Thus, BLM should consider all resources, including the preservation of cultural and historic properties, when determining use distribution within a given plan.

One of FLPMA's fundamental policies is that "the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; [and], where appropriate, will preserve and protect certain public lands in their natural condition. . . ." *Id.* § 1701(a)(8). In order to ensure that this policy is carried out, the RMP needs to address potential threats to these values from a variety of uses, including but not limited to oil and gas development. For example, the RMP should also address the potential impacts of recreational uses such as Off-Road Vehicles (ORV) and other recreational activities. Taking into account impacts from only one use would fail to meet both the spirit and letter of FLPMA's multiple-use mandate.

Mr. Jim Murkin
 Bureau of Land Management
 August 26, 2003
 Page 6

In general, the RMP must comport with the multiple use mandates set out in FLPMA and further defined in BLM's Cultural Resource Management Program (Manual 8100) [the "CRMP Manual"]. BLM should follow the five BLM objectives for identifying, planning, and managing cultural resources described in the CRMP Manual -

- (1) Respond to statutory authorities concerning historic preservation and cultural resource protection, and utilize the principles of multiple use;
- (2) Recognize the value of cultural resources, and manage in a way that does not diminish these uses and values;
- (3) "Contribute to land use planning and the multiple use management of the public lands in ways that make optimum use of the thousands of years of land use history inherent in cultural resource information, and that safeguard opportunities for attaining appropriate uses of cultural resources;"
- (4) Protect and preserves representative examples of cultural resources; and
- (5) "Ensure that proposed land uses, initiated or authorized by BLM, avoid inadvertent damage to federal and non-federal cultural resources."

BLM, CRMP Manual.

Recommendations:

BLM should:

- ◆ Establish as a goal the protection, conservation, and, where appropriate, restoration, of archeological and historic sites and landscapes in the Casper field area;
 - ◆ Determine the sites or areas that are most vulnerable to current and future adverse impacts and adopt management actions necessary to protect, conserve, and restore cultural resources; and
 - ◆ Outline specific management actions, such as stabilization, fencing, signage, closures, or interpretative development, to protect, conserve and, where appropriate, restore cultural resources.
4. **BLM Should Comply with Section 106 of the NHPA Prior to Designating Areas for Off-Road Vehicle Use.**

In the National Trust's view, designating certain areas for Off-Road Vehicle (ORV) use in the RMP requires prior compliance with Section 106 of the NHPA. Accordingly, BLM should conduct a Section 106 review of areas designated for ORV use, before approving the RMP. Section 106 review is triggered when a federal agency approves an undertaking. *Id.* . BLM's regulations state that the RMP "is not a final implementation decision on actions which require further specific plans, process steps, or decisions under specific provisions of law and

Mr. Jim Murkin
 Bureau of Land Management
 August 26, 2003
 Page 7

regulations.” 43 C.F.R. § 1601.0-5(k). However, designating an area in the RMP as open for ORV use is a final implementation decision, because it does not require further specific plans or approvals from BLM. ORV use has the serious potential to harm identified and unidentified cultural and historic resources. Therefore, we believe that designating an area in the RMP for ORV use is a site-specific activity that requires Section 106 review prior to approval of the RMP.

Recommendations:

BLM should not approve ORV designations in the RMP, either “open” or “limited,” until it has completed a Section 106 review.

5. Ensure Adequate Viewshed Protection for the Oregon/Mormon National Historic Trail within the RMP Area

In designating specific areas as open for activities, e.g. oil and gas development, BLM must ensure that such activities will not adversely impact the historic landscape, or viewshed, of the Oregon/Mormon National Historic Trail. Historic landscapes are a large part of what makes National Historic Trails so significant. If resource use designation in the RMP will potentially allow for surface occupancy, or other surface activities that may obstruct the viewshed of any historic trail, BLM should comply with the mandates of Section 106 of the NHPA prior to approving the RMP.

Recommendations:

BLM should:

- ◆ Conduct a Section 106 review before designating any areas in and around National Historic Trails as open for activities that may allow surface occupancy;
- ◆ Provide adequate buffer zones to ensure that surface activities will not adversely impact the viewshed for National Historic Trail;
- ◆ Attach adequate restrictions and stipulations for areas open for oil and gas development outside of the buffer zones; and
- ◆ In the alternative, restrict activities by applying NSO restrictions or other enforceable stipulations adequate to prevent all impacts to the historic viewsheds of National Historic Trail.

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Mr. Jim Murkin
Bureau of Land Management
August 26, 2003
Page 8

The National Trust appreciates the opportunity to provide these scoping comments for the Casper area RMP. We believe that the resource management planning process is a critical step in the stewardship and protection of cultural and historic resources. If we can provide you with additional information or otherwise be of assistance, we will be happy to do so.

Respectfully submitted,



Michael Smith
Public Lands Counsel

cc: Richard Curritt, Wyoming SHPO, Cheyenne
Tim Nowack, BLM, Cheyenne
Carol Legard, ACHP, Denver
Barbara Pahl, NTHP, Denver
Darrin Old Coyote, Crow Nation
Jimmy St. Goddard, Blackfeet Nation
Jimmy Arterberry, Comanche Tribe
Carlton Underwood, Northern Arapahoe Business Council
Floyd Wopsock, Northern Ute Tribe
Blaine Edmo, Shoshone-Bannock Tribe
John Washakie, Eastern Shoshone Tribe
Gilbert Brady, Northern Cheyenne Cultural Board

WYOMING
GAME AND FISH DEPARTMENT



Dave Freudenthal, Governor

Brent Manning, Director

"Conserving Wildlife - Serving People"

11 August 2003

Linda Stone (ms)

BLM Wyoming Casper Field Office
Jim Murkin
2987 Prospector Dr.
Casper, WY 82604

Dear Mr. Murkin,

The Swift Fox Conservation Team (SFCT) is a multi-agency group comprised of representatives from 10 state wildlife agencies within the historic range of the swift fox and select federal wildlife and land management agencies, including the Bureau of Land Management (BLM). The SFCT formed as a result of the U.S. Fish and Wildlife Service determination that listing the swift fox as a Federally Threatened or Endangered Species may be warranted. Through the efforts of the SFCT, the swift fox was delisted in 2001, but the SFCT remains committed to ensuring their long-term conservation.

We have been informed that the BLM is preparing and/or undergoing revisions of its Resource Management Plans (RMP) in many of our member states. Your office oversees lands that has the potential to impact swift fox conservation, and we request that swift fox conservation measures (e.g., recognize and manage habitat needs for sustaining populations and encouraging population expansion) be incorporated into future land-use plan amendments or revisions. We also urge you to incorporate analysis of the swift fox into all NEPA documents for the affected areas as well as include the swift fox on the BLM State List of Sensitive Species, if not already included. These actions would be consistent with BLM policy outlined in manual supplement 6830, which requires that BLM offices not authorize actions that would contribute to the need to list a species under the Endangered Species Act.

In general, swift foxes are associated with the shortgrass and midgrass prairie ecosystem (Figure1). Similar to many species, swift foxes were subjected to dramatic reduction in distribution from their historical range. However, as a result of natural recolonization and reintroduction, a contiguous population occupies portions of Wyoming, Colorado, and Kansas. Swift foxes also occupy portions of Oklahoma, Texas, New Mexico, Nebraska, South Dakota, and Montana. North Dakota is the only state within their historic range where swift fox are thought to be extirpated.

*

CSL-0004

BLM CASPER

FM SUPPORT

PA IRM

M&L FIRE

AUG 19 2003

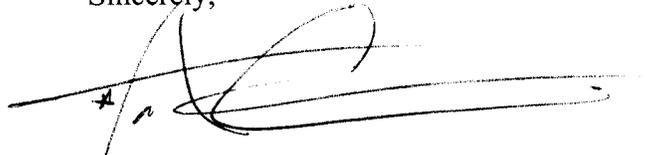
RES ENG. SVC.

SOLIDS RMG

BFO NFO

Conservation of swift foxes and their associated habitats can be achieved by a coordinated and cooperative management approach, utilizing both state and federal resources. The SFCT would be pleased to provide guidelines or comments regarding swift fox conservation during your revision process, and we look forward to working with your office in this cooperative effort. Please feel free to contact me at 307-332-2688 or martin.grenier@wgf.state.wy.us if I can be of assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Martin Grenier', with a long horizontal flourish extending to the right.

Martin Grenier
WGFD Nongame Mammal Biologist
SFCT member, State of Wyoming representative

JE/mbg

cc: Jacquie Emer
Bob Oakleaf
Bob Bennett

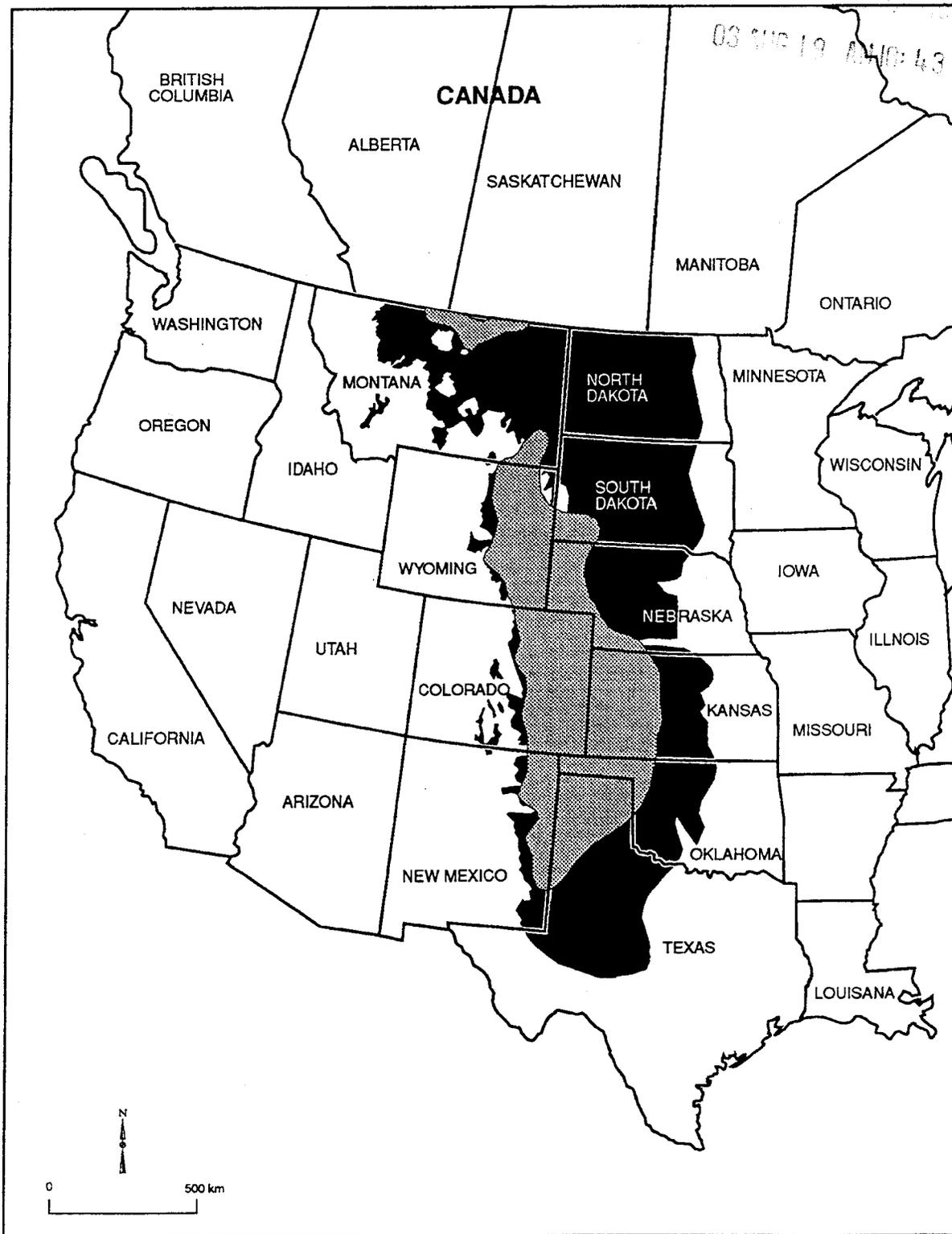


Figure 1. Current known swift fox distribution in the United States (hatched pattern) (Allen et al. 1996) and classification of shortgrass and midgrass prairie grassland types in the central United States (solid black pattern) as modified from Lauenroth (1996).

Confirmation Report - Memory Send

Date & Time: 09-19-2003 12:13
 Tel line : +2617587
 Machine ID : BLM/CFO

Job number : 066
 Date & Time : 09-19 12:11
 To : 913077778586
 Number of pages : 003
 Start time : 09-19 12:11
 End time : 09-19 12:13
 Pages sent : 003
 Status : OK

Job number : 066

*** SEND SUCCESSFUL ***



11 August 2003

Linda Slone (ma)

BLM Wyoming Casper Field Office
 Jim Murkin
 2987 Prospector Dr.
 Casper, WY 82604

<input checked="" type="checkbox"/>	BLM CASPER	<input type="checkbox"/>	SUPPORT
<input checked="" type="checkbox"/>	FM	<input type="checkbox"/>	IRM
<input checked="" type="checkbox"/>	PA	<input type="checkbox"/>	FIRE
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<input checked="" type="checkbox"/>	OS	<input type="checkbox"/>	
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<input checked="" type="checkbox"/>	RES	<input type="checkbox"/>	ENG. SVC.
<input type="checkbox"/>	SOLIDS	<input type="checkbox"/>	RMG
<input type="checkbox"/>	BFO	<input type="checkbox"/>	NFO

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Post-It* Fax Note	7871	Date	9-19	Pages	3
To	TRACY WILLIAMS	From	LINDA SLONE		
Co./Dept	STATE PLANNING	Co.	BLM - CASPER		
Phone #		Phone #			
Fax #	307.777.8586	Fax #			

Headquarters: 5400 Bishop Boulevard, Cheyenne, WY 82006-0001
 Fax: (307) 777-4610 Web Site: http://gf.state.wy.us



Wyoming Department of Agriculture

Dave Freudenthal, Governor

John Etchepare, Director

2219 Carey Ave., Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ FAX: 307-777-5933
E-mail: wdal.state.wy.us ■ Website: wyagric.state.wy.us

BUREAU OF LAND MANAGEMENT
CASPERS FIELD OFFICE

August 29, 2003

03 SEP -8 PM 1:09

Board Members

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- District 2*
Kate Moon
- District 3*
Reed Gardner
- District 4*
Helen Jones
- District 5*
Spencer Ellis
- District 6*
Alan Todd
- District 7*
Arlene Brown

State Planning Coordinator's Office
122 West 25th Street
Herschler Building, 1E
Cheyenne, Wyoming 82002-0001

Dear Lynn Simons:

Following are our scoping comments for the Revised Platte River Resource Management Plan for the Bureau of Land Management.

Our comments are specific to WDA's mission within state government which is to assist the citizens of Wyoming to live safe and healthy lives, promote and preserve our agricultural community, be responsible stewards of our natural resources, and achieve integrity in the market place. As this proposed project affects the welfare of our citizens, our agriculture industry, and our natural resources, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

The Notice of intent to revise this RMP notes the planning areas covers 1.4 million acres of BLM-administered public land surface and 4.7 million acres of BLM-administered federal mineral estate. The Notice further specifies several major issue themes, including livestock grazing, landownership adjustments, and management and cumulative effect of land uses and human activities on threatened, endangered, candidate, and sensitive species and their habitats. Thus, this project will definitely affect grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources over a large area of our state. Officials need to consider these effects, both direct, indirect, economic, and environmental. Moreover, decisions that affect grazing or other uses in the study area will have significant compounding impacts and rippling repercussions on private, state, and other federal lands, and upon agriculture producers and communities adjacent to the study area. These impacts and repercussions need to be evaluated. The cumulative adverse impacts upon ranchers specifically should be included.

We strongly encourage BLM officials to continue to work with all grazing permittees and agriculture producers affected by this project to learn of their concerns and recommendations about the proposed policies and actions regarding this project. These folks are intimately familiar with the area under study and possess irreplaceable long-term, on-the-ground knowledge. They understand that it is in their best interests to continue to serve as stewards of the rangelands in this area. They are particularly aware of the impacts upon the wildlife and livestock habitat and the rangeland health of the proposed project. Their many years of daily on-the-ground wisdom often lead to recommendations that can help identify reasonable and

successful management strategies that are both environmentally and economically sound. Thus, we strongly recommend BLM officials aggressively address the concerns and recommendations of these stewards during the planning process.

It is imperative that BLM officials ensure that all livestock grazing permittees who are directly affected by this proposal receive all notices about this revision.

Grazing on public lands represents a vital economic value to agriculture producers and to local communities. Impacts on this economic activity, specifically within the affected area and also in adjoining areas, need to be included in the study.

Grazing also represents irreplaceable environmental and social values, contributing valuable wildlife habitat, open spaces, ranch land buffers between federal lands and developments, scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. Any loss of these essential environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the study.

Environmental studies often spotlight the costs of livestock grazing or of other commodity uses while failing to include the values of these uses. Perhaps worse, the studies fail to include the costs of desired goals, such as recreation, habitat improvement, naturalness, etc., while spotlighting their values. To be fair, the American public and the citizens of Wyoming deserve to know all costs and values of each use. In that regard, the specific costs of enforcement of each alternative should also be identified.

Previous proposed revisions have often unfairly singled out the impacts of livestock grazing regarding impacts on resources. These biases were compounded by the failure to mention other users which created identical or similar impacts on these resources. Although the impacts of wildlife and wild horses were often omitted in these areas, all uses which affect the resource under study should be included.

The Notice of Intent states the revised RMP will comply with all applicable laws, regulations, policy, and guidance. The congressional mandates, federal statutes, and implementing regulations that call for multiple use should be an integral part of the planning process and strongly evident in the Revised RMP.

We note that the Intent states "BLM will use current scientific information, research, new technologies, and the results of resource assessments, monitoring, and coordination to determine appropriate local and regional management strategies." We recommend you carry this mandate for science further. Peer-reviewed science should underlie your decisions regarding the revised RMP and that science should be identified in the decisions and discussions regarding this planned assessment.

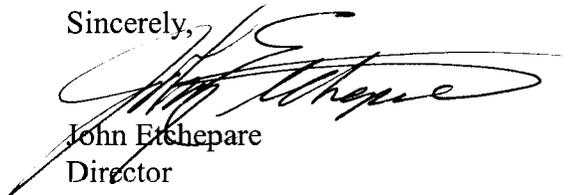
These comments are reflective of a specific agency mission only. These comments defer to and are subordinate to the State Position

BUREAU OF LAND
MANAGEMENT
CASPER FIELD OFFICE
SEP-8 PM 1:09

Decisions in the proposed plan should allow BLM officials, grazing permittees, and company officials the opportunity to work cooperatively and the flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens.

In conclusion, we appreciate the opportunity to comment on the scope of the proposed actions, we encourage continued attention to our concerns, and we look forward to hearing about proposed actions and decisions.

Sincerely,



John Etchepare
Director

BUREAU OF LAND
MANAGEMENT
CASPER FIELD OFFICE
03 SEP - 8 PM 1:09

State of Wyoming
Office of the Governor
Planning Coordinator's Office

DATE: September 5, 2003

TO: Linda Slone, BLM Project Lead

FAX NUMBER: 307-261-7587

PHONE NUMBER:

FROM: Tracy J. Williams, Policy Analyst

Linda: Attached, please find additional comments regarding the Casper RMP from the Department of Agriculture. I know that these comments are being submitted past the deadline. I apologize for any inconvenience this may cause. Thank you.

Transmitting (3) Pages **Plus** the Cover Page

Original letter mailed this date via U.S. Postal Service

122 West 25th Street -- Herschler Bldg., 1 East -- Cheyenne, WY 82002-0600
307.777.6924 -- 307.777.8586 fax



Wyoming Department of Agriculture

2219 Carey Ave., Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593
E-mail: wda1.state.wy.us ■ Website: wyagric.state.wy.us

Dave Freudenthal, Governor

John Etchepare, Director

August 29, 2003

State Planning Coordinator's Office
122 West 25th Street
Herschler Building, 1E
Cheyenne, Wyoming 82002-0001

Dear Lynn Simons:

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Our comments are specific to WDA's mission within state government which is to assist the citizens of Wyoming to live safe and healthy lives, promote and preserve our agricultural community, be responsible stewards of our natural resources, and achieve integrity in the market place. As this proposed project affects the welfare of our citizens, our agriculture industry, and our natural resources, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

The Notice of intent to revise this RMP notes the planning areas covers 1.4 million acres of BLM-administered public land surface and 4.7 million acres of BLM-administered federal mineral estate. The Notice further specifies several major issue themes, including livestock grazing, landownership adjustments, and management and cumulative effect of land uses and human activities on threatened, endangered, candidate, and sensitive species and their habitats. Thus, this project will definitely affect grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources over a large area of our state. Officials need to consider these effects, both direct, indirect, economic, and environmental. Moreover, decisions that affect grazing or other uses in the study area will have significant compounding impacts and rippling repercussions on private, state, and other federal lands, and upon agriculture producers and communities adjacent to the study area. These impacts and repercussions need to be evaluated. The cumulative adverse impacts upon ranchers specifically should be included.

We strongly encourage BLM officials to continue to work with all grazing permittees and agriculture producers affected by this project to learn of their concerns and recommendations about the proposed policies and actions regarding this project. These folks are intimately familiar with the area under study and possess irreplaceable long-term, on-the-ground knowledge. They understand that it is in their best interests to continue to serve as stewards of the rangelands in this area. They are particularly aware of the impacts upon the wildlife and livestock habitat and the rangeland health of the proposed project. Their many years of daily on-the-ground wisdom often lead to recommendations that can help identify reasonable and

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It is imperative that BLM officials ensure that all livestock grazing permittees who are directly affected by this proposal receive all notices about this revision.

Grazing on public lands represents a vital economic value to agriculture producers and to local communities. Impacts on this economic activity, specifically within the affected area and also in adjoining areas, need to be included in the study.

Grazing also represents irreplaceable environmental and social values, contributing valuable wildlife habitat, open spaces, ranch land buffers between federal lands and developments, scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. Any loss of these essential environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the study.

Environmental studies often spotlight the costs of livestock grazing or of other commodity uses while failing to include the values of these uses. Perhaps worse, the studies fail to include the costs of desired goals, such as recreation, habitat improvement, naturalness, etc., while spotlighting their values. To be fair, the American public and the citizens of Wyoming deserve to know all costs and values of each use. In that regard, the specific costs of enforcement of each alternative should also be identified.

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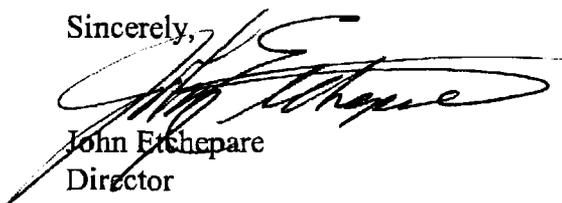
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These comments are reflective of a specific agency mission only. These comments defer to and are subordinate to the State Position

Decisions in the proposed plan should allow BLM officials, grazing permittees, and company officials the opportunity to work cooperatively and the flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens.

In conclusion, we appreciate the opportunity to comment on the scope of the proposed actions, we encourage continued attention to our concerns, and we look forward to hearing about proposed actions and decisions.

Sincerely,



John Etchepare
Director

DAVE FREUDENTHAL
GOVERNOR



STATE CAPITOL
CHEYENNE, WY 82002

Office of the Governor

August 15, 2003

Linda Slone
BLM, Casper Field Office
2987 Prospector Drive
Casper, WY 82604

Re: Notice of Intent to Revise the Platte River (Casper) Resource Management Plan and Prepare an Environmental Impact Statement, 68 FR 119, 37020-22
State Identifier, 2003-085

Dear Linda:

I have reviewed the referenced notice on behalf of the State Planning Office. In addition, the document was distributed to state agencies for their review and comment in accordance with State Clearinghouse procedures. Enclosed you will find comments from the Wyoming Game and Fish Department, the State Historic Preservation Office, the Wyoming Department of Environmental Quality (Air and Water Quality Divisions), the Office of State Lands and Investments, and the Wyoming State Trails Program which resulted from their reviews. Your due consideration of the issues they have identified will be appreciated.

As a Cooperating Agency, the State of Wyoming looks forward to the revision process and trusts that it will be a productive partnership. A Memorandum of Understanding (MOU) which outlines the State's participation in all the Bureau of Land Management's (BLM) Resource Management Plan Revisions is presently under review by the legal divisions of the State and the BLM. The MOU will formally outline our roles and responsibilities. Should there be a need to draft any additional documents specific to this plan revision, please let me know.

Finally, as I mentioned in our phone conversation earlier today, I will be the State's representative and I look forward to working closely with you on this project.

Linda Slone
August 15, 2003
Page Two

08/15/2003 11:40

Please provide this office with fifteen (15) hard copies or electronic copy (submitted to SPC@state.wy.us) of documents for our continued review and distribution to interested and affected agencies. Thank you for the opportunity to comment.

Sincerely,



Julie Kozlowski
Policy Analyst

/jk

Enclosures (6)

cc: Wyoming Game and Fish Department
State Historic Preservation Office
Wyoming Department of Environmental Quality
Office of State Lands and Investments
Wyoming State Trails Program



Wyoming Department of State Parks and Cultural Resources
State Historic Preservation Office

RECEIVED

2003 AUG -5 P 1:40

GOVERNOR'S PLANNING OFFICE

Richard L. Currit, SHPO
 2301 Central Avenue
 Barrett Building, 3rd Floor
 Cheyenne, WY 82002
 Phone (307) 777-7697
 FAX (307) 777-6421

August 4, 2003

Lynn Simons, Director
 Wyoming State Clearinghouse
 Governor's Planning Office
 Herschler Building, 1 East
 Cheyenne, WY 82002-0600

RE: Governor's Planning Office Project ID#: 2003-085, NEPA Scoping Notice: BLM Casper, Platte River Resource Management Plan Revision (to be retitled Casper RMP). Converse, Goshen, Natrona, and Platte Counties. (SHPO File # 0803RDY003)

Dear Director Simons:

We have reviewed the above Scoping Notice, as requested by your office's transmittal letter of July 24, 2003, with a comments due date of August 11, 2003. Thank you for this opportunity to comment.

Consideration and management of cultural resources for Bureau of Land Management activities and lands is substantially conducted in accord with Sections 106 (36CFR800) and 110 of the National Historic Preservation Act, and the BLM National Cultural Programmatic Agreement as modified by the Wyoming State Protocol. These call for survey, evaluation, and protection of significant historic, cultural, and archaeological properties that could potentially be affected by proposed BLM actions -- in this case, specific to the Casper RMP. We do have a few comments to offer at this time (see below), but we will likely provide further and more in depth comments when provided with the Draft Casper RMP and EIS.

Generally, we expect to see an in depth overview and situational analysis of Casper BLM managed cultural resources. A critical part of this analysis should be a discussion, supported by appropriate comparison charts, that indicates how well the Casper BLM achieved the cultural resources goals of the current (1985) Platte River RMP, relative to new goals (if any) that will be established by this revision, and what remains unchanged and/or unaccomplished from the 1985 RMP. Specifically, we expect to see special attention given by the BLM to the protection -- particularly viewshed protection -- of historically important transportation corridors (e.g., trails, roads, railroads) and to the Cedar Ridge Native American Traditional Cultural Property (TCP).

Please refer to the above SHPO project control number (0803RDY003) in future communications dealing with this action. If you have questions please do not hesitate to contact Robert York at 307-742-3054, or me at 307-777-6311.

Sincerely,

Judy K. Wolf
 Review and Compliance Program Manager

03 AUG 20 AM 10:40



WYOMING

DEPARTMENT OF STATE PARKS & CULTURAL RESOURCES
 DIVISION OF STATE PARKS & HISTORIC SITES

Pat Green
 Division Director
 State Parks & Historic Sites
 2301 Central
 Barrett Building 4th Floor
 Cheyenne, WY 82002

(307) 777-6323
 FAX (307) 777-6005

July 29, 2003

State Planning Coordinator's Office
 Herschler Building, 1E
 122 West 25th Street
 Cheyenne, WY 82002-0001

Re: Platte River Resource Management Plan, OFLP#: 2003-085

Dear Sir or Madam:

One of the key topics listed as a major issue that will be addressed in the Platte River Resource Management Plan revision is that of recreation, more specifically Off-Highway Vehicle (OHV) recreation (aka Off-Road Vehicle (ORV) recreation). The Wyoming State Trails Program would like to see more of an emphasis placed on establishing a current inventory of roads and trails that currently reflects the opportunities for ORV recreation in Wyoming. BLM-administered roads and trails that are to be enrolled in the Wyoming ORV Program will need to be clearly identified to ensure that appropriate maintenance and construction can be properly funded and administered. As this type of recreational activity becomes increasingly popular, this inventory will be necessary to facilitate the partnership between the BLM and the State Trails Program and to provide the highest quality experience for Wyoming ORV users. This inventory will also foster the development of a proper enforcement program to ensure that the use is occurring only in designated areas that are assigned by your agency.

The Wyoming State Trails Program is requesting that the planning process addresses these issues. We would like you to provide us with information regarding any mitigation measures that the BLM intends to take to ensure that recreational trail users will continue to be provided a positive visitation experience. We request that these comments not be ignored. Please keep us informed of any future developments and procedures pertaining to this project.

Thank you for considering our comments.

Sincerely,



Kim Raap
 Manager
 Wyoming State Trails Program

Dave Freudenthal, *Governor*



Phil Noble, *Director*

07-31-03 03:04:00
 11:51:23 AM '03
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Office of State Lands and Investments
Funding Wyoming Public Education

122 West 25th Street
 Cheyenne, WY 82002
 Phone: (307) 777-7331
 Fax: (307) 777-5400
slfmail@state.wy.us



Dave Freudenthal
 Governor

Lynne Boomgaarden
 Director

August 11, 2003

Ms. Lynn Simons, State Planning Coordinator
 State Planning Coordinator's Office
 Herschler Building, 1East
 122 West 25th Street
 Cheyenne, Wyoming 82002

**Re: SPC Project Number 2003-085
 Platte River (Casper) Resource Management Plan
 Notice of Intent**

Dear Ms. Simons:

The staff of the Office of State Lands and Investments has reviewed the captioned Notice of Intent and offer the following comments relative to the proposed action insofar as it pertains to the mission of this office.

A paramount concern of this office is the possibility and likelihood that, due to the mosaic land ownership patterns, federal prescriptions imposed by the Bureau of Land Management upon a collective area of federal lands will impede our ability to develop the State's subsurface. Therefore, we would ask that the Bureau of Land Management be sensitive to maintaining access to State trust lands isolated by lands under the BLM's jurisdiction and encourage a balanced approach to the use of the area's resources with minimal regulation when appropriate.

Unfortunately, our office does not possess coal resource, fire/fuels or forestry data that we could contribute to this effort at this time. However, we would be happy to provide our land status coverage insofar as it relates to a particular estate, be it mineral estate, surface estate or both, owned and administered by the State of Wyoming for the benefit of the common school and other beneficiaries, if you so desire.

We appreciate this opportunity to comment. If we may be of further assistance, please do not hesitate to contact this office.

Very truly yours,

Lynne Boomgaarden
 Lynne Boomgaarden
 Director

sc

08 AUG 20 10:10 AM
 STATE OF WYOMING
 OFFICE OF STATE LANDS AND INVESTMENTS
 122 WEST 25TH STREET
 CHEYENNE, WY 82002



The State of Wyoming

Department of Environmental Quality

Dave Freudenthal, Governor

Herschler Building • 122 West 25th Street • Cheyenne, Wyoming 82002

ADMIN/OUTREACH (307)777-7758 FAX 777-3610	ABANDONED MINES (307)777-6145 FAX 777-6462	AIR QUALITY (307)777-7391 FAX 777-5616	INDUSTRIAL SITING (307)777-7369 FAX 777-6937	LAND QUALITY (307)777-7756 FAX 777-5864	SOLID & HAZ. WASTE (307)777-7752 FAX 777-5973	WATER QUALITY (307)777-7781 FAX 777-5973
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August 7, 2003

BLM Casper Field Office
2987 Prospector Drive
Casper, WY 82604

RE: Response to the Scoping Statement, for the Platte River Resource Management Plan

Dear Sir or Madam:

These comments regarding the Scoping Statement, for the Platte River Resource Management Plan (RMP) in Converse, Goshen, Natrona, and Platte Counties are specific to this agency's statutory mission within State government which is protection of public health and the environment. In that regard these comments are meant to, in association with all other agency comments, assist in defining the Official State Position.

Thank you for the opportunity to comment on the proposed Platte River RMP revision.

The Department of Environmental Quality (DEQ) would like to provide the Bureau of Land Management (BLM) with any information concerning water quality that may aid in the RMP Revision process. The discharge and handling of produced water from the oil and gas industry is a specific concern of the Department. This concern is based on the large potential for oil and gas development in the area. The DEQ and it's staff would like to assist the BLM in assessing water resource concerns and developing mitigative measures as needed.

We appreciate the opportunity to comment on this process and look forward to working with you in the future. If you have any questions, please feel free to contact Jeremy Lyon at 307-777-7588.

Sincerely,

John V. Corra
Director
Department of Environmental Quality

JC/JML/bb/3-0859.ltr

d:\spcwpd\spc03\platteriver_rmp.wpd

These comments are reflective of a specific agency mission only. These comments defer to and are subordinate to the Official State Position.

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PLATE RIVER RESOURCE

WYOMING
GAME AND FISH DEPARTMENT



"Conserving Wildlife - Serving People"

August 13, 2003

WER 2419.01
Bureau of Land Management
Federal Register, Notice of Intent
Platte River Resource Management Plan Revision
Referred in the Future as Casper RMP
PROJECT ID# 2003-085

Wyoming State Clearinghouse
State Planning Coordinator's Office
Herschler Building, 1 East
122 W. 25th Street
Cheyenne, WY 82002-0600

Dear Ms. Simons:

The staff of the Wyoming Game and Fish Department has reviewed the Federal Register Notice to Revise the Platte River Resource Management Plan and to be titled and referred to in the future as the Casper Resource Management Plan. We offer the following comments.

The BLM should evaluate action items from the Planning Decisions section of the 1985 Resource Management Plan (RMP) to help determine continuing issues and concerns for the new RMP, including:

- Habitat Management Plans (HMPs) – WL1
- Fence modifications to improve pronghorn movements and development of permanent water sites for pronghorn – WL2
- Water development for mule deer – WL3
- Restoration of streambank cover to enhance riparian habitat on portions of Buffalo Creek and Trout Creek – WL10
- Status of wildlife management covered under the remaining segments of the Planning Decisions section (WL4 – WL9).

INFORMATION

We would like to collaborate with BLM personnel on updating the following pertinent wildlife data to ensure current and accurate information for this planning process:

- i) Sage grouse lek locations
- ii) Big game seasonal range designations
- iii) Big game migration corridors

Headquarters: 5400 Bishop Boulevard, Cheyenne, WY 82006-0001
Fax: (307) 777-4610 Web Site: <http://gf.state.wy.us>

Ms. Lynn Simons
August 13, 2003
Page 2 – WER 2419

- iv) Raptor nest locations
- v) Important bird areas, such as bald eagle roosts, feeding areas, etc.
- vi) Existing non-game bird and mammal habitats for BLM sensitive species and our Department's Native Species Status 1 through 3 species.

The Department has been collecting shrub (mahogany and sagebrush) production and utilization data for several areas within the Casper Field Office Area. This data indicates shrub condition is declining. As a result, habitat conditions for wildlife are declining. We would like to share this data with BLM, and collaboratively work to address shrub management in the RMP.

It should be noted that our Department's Casper Aquatic Region shares the North Platte River below Pathfinder Reservoir and parts of Salt Creek and the South Fork Powder River with the BLM Casper Region (Figure 1).

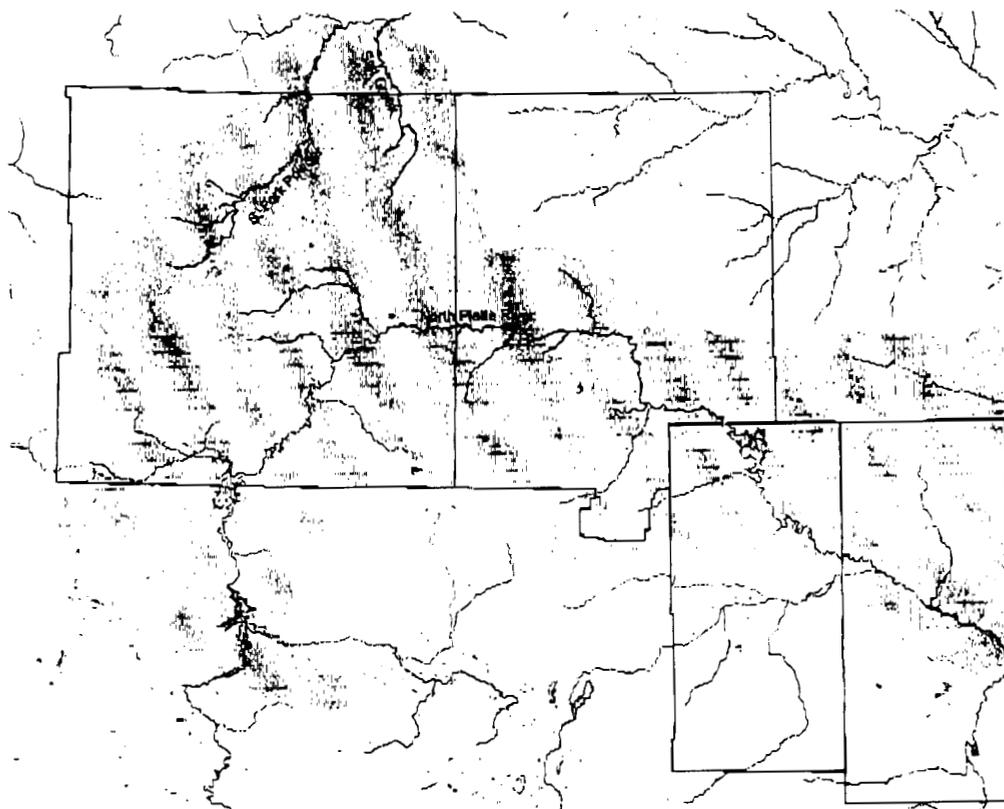


Figure 1. Overlap of the WGFD Casper Aquatic Region with the counties in the BLM Casper Region showing the major rivers and reservoirs.

08-13-03 08:24:00
Lynn Simons
Casper, WY

Ms. Lynn Simons
 August 13, 2003
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Habitat Priorities.

Our Department's Aquatic Habitat Section recently prioritized the basins in each region according to fisheries and habitat issues (Figure 2). Casper Region priorities 1, 3, 4, 5, 6, 7, and 8 fall within the BLM Casper Region.

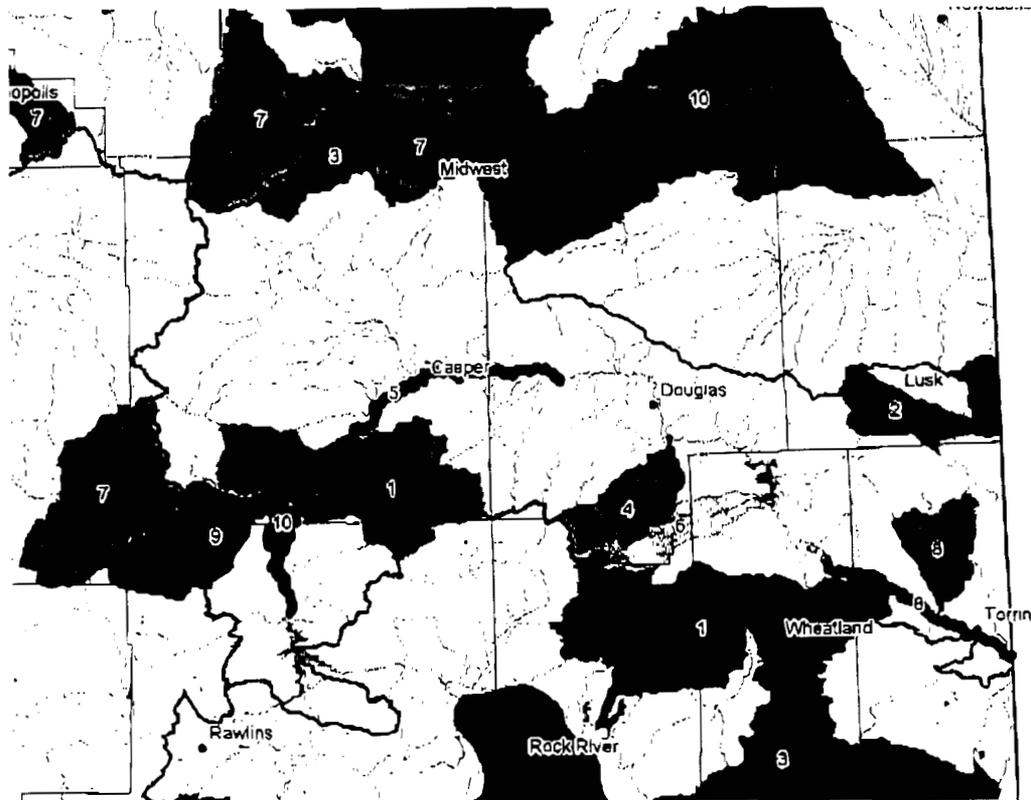


Figure 2. Casper and surrounding WGFD aquatic regions' habitat priorities.

Aquatic Non-game Species. Habitat priorities 3, the South Fork Powder River; 7, Salt Creek; and 8, Rawhide Creek and the lower North Platte River, were prioritized partly due to their non-game fish populations and herptile diversity. We will be intensifying data collection for these areas. Some of the data has already been provided to the BLM, but all data collected will be available to the BLM. The RMP should consider the sensitivity ratings of various non-game fish in habitat management.

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Ms. Lynn Simons
August 13, 2003
Page 4 – WER 2419

ISSUES AND CONCERNS

Impacts of the recent drought on wildlife habitat. Together with other long-term effects (e.g., fire suppression, plant succession, livestock grazing, etc.) on wildlife habitat, we recommend the RMP evaluate planning contingencies to react to continued drought and other cumulative effects.

Off-highway vehicle use. This use impacts wildlife habitat and wildlife use of habitat. The RMP should specifically address transportation planning that includes off-road use and its probable increase in the future.

CBM and oil/gas development. There is potential for increased development (e.g., from CBM expansion of existing oil and gas fields). The RMP should address the foreseeable level of development and the probable impacts on wildlife and habitat. This should include habitat fragmentation, possible increased wildlife harassment, associated roadway impacts (such as erosion, non-native invasive plants, noise impacts to wildlife), and other cumulative impacts associated with mineral, oil or gas extraction. The RMP should also address mitigation approaches to minimize these impacts.

Sage grouse. Sage grouse have been petitioned as an endangered species. There has been much research and effort to address management of sage grouse and sage grouse habitat since the 1985 RMP was written. We recommend the RMP include guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage Grouse Conservation Plan (June 2003), Guidelines to manage sage grouse populations and their habitats (Connelly et al., 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (Wyoming Game and Fish Department and Wyoming BLM, 2002). We recommend the RMP encourage localized conservation efforts, such as the Bates Hole sage grouse conservation working group.

Game and Fish Department Casper Region Strategic Habitat Plan priorities. Maintenance and improvement of key wildlife habitats is an issue. These priorities are available and should be included in the RMP to help guide wildlife habitat management planning and implementation. All active management techniques (e.g., prescribed fire) as well as planning at appropriate scales (e.g., watersheds) should be incorporated in the RMP.

Big Sagebrush Management guidelines and objectives. Maintenance and improvement of sagebrush will be important for maintaining wildlife habitats and is a concern. The BLM has been given these already, and we recommend their reference and use in developing and implementing the RMP.

Habitat Management Plans. Continuation of existing HMPs and formulation of necessary additional HMPs is a concern.

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Ms. Lynn Simons
August 13, 2003
Page 5 – WER 2419

ACEC Designations. Maintenance of key wildlife habitats and habitat components in perpetuity is a concern. Designation of special management areas for key wildlife habitats should be considered.

The RMP should address the possibility and ramifications of nominating the North Platte River from the Pathfinder Dam to the Dave Johnson Power Plant as an ACEC because of its outstanding value as a sport fishery.

Wildlife seasonal stipulations. Protection of key wildlife habitats during important seasons of use is an issue. Implementation of seasonal stipulations should be specifically addressed in the RMP.

Fire Management. Adequate and proper use of fire as a habitat management tool planning and implementation tool is an issue. The RMP should specifically address past and future uses of fire and its proper implementation for specific purposes, as well as post-treatment management and monitoring.

Fire frequency has been extended in most of the resource area with improved technology and fire fighting methods. In some areas, a return to a more historical fire regime may be desired. Use of prescribed fire and planning for managed wildfire would complement each other and provide for healthier plant communities. Certainly, potential invasion of exotic plants such as cheatgrass would be a determining factor in how the RMP addresses fire management.

Economics. The contribution of fishing and hunting, and estimates of the value of nonconsumptive wildlife uses, to the local and state economy, should be included. This will help guide discussions on both wildlife and other economic management directions in the RMP.

Non-game bird and mammal plan. Adequate habitat for sensitive species and prevention of future listings of these species is an issue. Our Department's plan for high priority nongame species should be referenced as guidance for habitat management in key areas.

Realty actions. Access to public lands is an issue, and management is easier if public lands are blocked up. The RMP should include and promote actions such as conservation easements and land exchanges to accomplish those purposes. Additionally, the RMP should consider access for anglers and hunters in realty actions. BLM should consult with WGFD for data that would ensure crucial ranges and riparian areas are conserved and that harvest can occur to meet herd objectives.

For BLM lands included within the boundaries of or adjoining our Department's Wildlife Habitat Management Units (Rawhide, Table Mountain, Springer/Bump Sullivan, and Cottonwood) we ask that the BLM not include these lands as lands targeted for disposal or mineral leasing. These lands provide important wildlife habitat and public access. This also applies to any other parcels of public land, regardless of size, that has any legal public access.

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WGFD HABITAT PROTECTION
Lynn Simons

Ms. Lynn Simons
August 13, 2003
Page 6 – WER 2419

Of particular importance are those BLM lands adjacent to Glendo, Gurnsey and Grayrocks Reservoirs, and lands near the Richeau and Cooney Hills.

We also recommend that the RMP address withdrawal of mineral leasing associated with our Habitat Units and the lands adjacent to these three reservoirs.

Grass banks. The ability to implement habitat improvements on existing allotments is an issue. These actions could happen much easier with the availability of vacant allotments where permittees could temporarily relocate livestock while their regular allotments were being treated.

Transportation Plan. The effects of roads on wildlife and habitat, particularly in areas of intensive energy development, are concerns. Road management should be addressed in the RMP, particularly in reference to habitat fragmentation, habitat losses, and wildlife disturbance.

AMP development. The lack of specific allotment planning is a concern, particularly in key wildlife habitat areas. The RMP should promote planning, with emphasis on inclusion of all affected parties.

Cumulative impacts. With increasing intensity of land uses (energy development, recreation) the need for increased cumulative analysis of effects is a concern. This should be done at appropriate local and regional scales to be most meaningful.

Riparian area management. Management of riparian areas in this arid climate will always be an issue. The RMP should especially address Proper Functioning Condition (PFC). The RMP should explore the possibility of setting riparian objectives and desired future condition beyond what is currently presented in PFC evaluations, particularly in areas with more friable soils. Where management cannot achieve objectives, WGFD asks that riparian fencing be constructed. Waterfowl nesting cover at Goldeneye Reservoir is a particular issue that should be addressed in the RMP. Trespass livestock grazing has reduced or eliminated residual cover in the past.

Trapping and transplanting. The ability to move animals into or out of specific areas for the purposes of managing or re-establishing fish and wildlife populations should be addressed in the RMP.

Crucial wildlife habitats. The ability to maintain and, where needed, improve crucial winter ranges is a concern. The RMP should specifically address land management on these areas.

Forage allocation. The RMP should assure that adequate forage is available to wildlife during the necessary seasons of use.

Invasive weed species. Adequate management of invasive species (e.g., cheatgrass, knapweed, etc.) is an issue. Excessive amounts of these species can decrease wildlife habitat and habitat values.

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Ms. Lynn Simons
August 13, 2003
Page 7 – WER 2419

Aspen. Aspen habitat management is an issue. This important habitat type greatly increases habitat diversity, but is present in limited amounts and will need specific attention in the RMP.

Forest Management (including aspen). Forest cover is very limited in most areas of the Casper Field Office Area. Management of this habitat to maintain and enhance habitat and thus wildlife diversity is a concern. Management under the new RMP should consider the benefits of forest cover, particularly Douglas-fir, to elk and other wildlife species as year-round cover and security cover. Alternatively, limber pine invasion of big sagebrush and mountain mahogany communities jeopardize the benefits of these shrub communities to wildlife, and a 10-15 year fire frequency in ponderosa pine communities would create a more desirable forest.

The RMP will need to address these diverse management needs in terms of providing wildlife habitat. Timber harvest on private lands bordering BLM lands in some areas increases the concern for landscape considerations on BLM lands.

North Platte River.

The North Platte provides a quarter million angling days per year. Access remains a critical issue. We applaud recent BLM actions to improve access and encourage the BLM to continue improving access through acquisitions and easements along the North Platte River.

The previous RMP focused on that section of the North Platte River west of Casper, but fisheries for trout and catfish extend further downriver. We recommend that the SW ¼ section of section 31, T34, R76 not be considered for disposal since it connects four state sections of river in an area that supports a trout fishery of 500 fish per mile greater than 6 inches and an uninterrupted riparian corridor for wildlife. Similarly, BLM properties in section 1, T24, R63, section 30, T25, R62, and section 25, T25, R63 are contiguous with the Rawhide Wildlife Habitat Management Area and we ask that they not be disposed.

Thirty-three Mile area.

We support the creation of new reservoirs that provide sport fisheries and wildlife habitat and the rehabilitation of existing reservoirs in the 33-mile area. We would like to coordinate with the BLM in developing a recreational plan for that area.

Spring and Seep Development. Protection of springs and seeps is an issue. The RMP needs to continue to protect these areas through fencing and adjacent water development.

Review the 1985 Platte River RMP. Several good initiatives were presented in the previous RMP that we would like to see continued in the upcoming revision, and an increased implementation of them.

Road Management. The RMP should address the issue of roads in the floodplain. Where streams must be crossed, best management practices should be employed to maintain stream equilibrium upstream and downstream of the crossing.

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Ms. Lynn Simons
August 13, 2003
Page 8 – WER 2419

Development. The RMP should mitigate for development. Reclamation following development should require native species of vegetation and consider the needs of fish and wildlife.

Sincerely,



BILL WICHERS
DEPUTY DIRECTOR

BW:TC:as

REFERENCES

Connelly, J.W., M.A. Schroeder, A.R. Sands, and C.E. Braun. 2000. Guidelines to manage sage grouse populations and their habitats. Wildlife Society Bulletin 2000, 28(4): 967-985.

Wyoming Game and Fish Department. June 24, 2003. Wyoming Greater Sage-Grouse Conservation Plan. 97 pp.

Wyoming Interagency Vegetation Committee. 2002. Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management. Wyoming Game and Fish Department and Wyoming BLM. Cheyenne, WY 53 pp.

09-01-03 00:00:00



JS
9/25/03

BUREAU OF LAND
MANAGEMENT
CASPER FIELD OFFICE

03 SEP 23 AM 11:07

Northern Plains Region
Linda Slone
BLM Wyoming
Casper Field Office
2987 Prospector Drive
Casper, WY 82604

Dear Ms. Slone:

The Sierra Club would like to nominate the following areas for ACEC designation and would like these nominations to be considered in the revision for the Platte River Resource Management Plan now being prepared by the Casper Field Office.

1. **The North Platte River Corridor.** The North Platte River provides outstanding recreational opportunities on a nationally significant river. Outstanding boating, fishing and hunting opportunities exist along the North Platte River, and management should be geared to protecting these opportunities.
2. **Casper Sand Dunes-**This is one of the few areas in the Great Plains which contains not only sand hills but also active dunes. This type of geologic phenomenon is rare in the Great Plains since few active areas on Sand Dunes exist in the biome.
3. **Hole in the Wall/Red Wall-** This is a former ACEC that should be redesignated particularly in light of the Buffalo Field Office's finding that the Hole in the Wall and adjacent Red Wall areas meet the relevance and importance criteria of ACEC designation. Other than the emigrant trails and Teapot Dome, the Hole in the Wall is probably the only other nationally recognized historic site within the area managed by the Field Office. Although the actual Hole in the Wall is located in Johnson County near the Natrona County line, the historic values and outstanding scenery extend into Natrona County and warrant designation.
4. **Muddy Mountain Environmental Education Center-** Muddy Mountains is a very scenic area which emphasizes recreation and environmental education on Casper Mountain. It is one of the few montane sites where the BLM has developed environmental education as an emphasis. It is also extensively used by hikers, campers, and schools.
5. **South Fork of the Powder River Watershed-** Public lands west of I-25 and north of U.S. Highway 20/26 have been identified in a World Wildlife Fund study as one of the 10 best remaining areas of intact native prairie left in the Northern Great Plains of North America. For this reason the BLM needs to realize the importance of this area and implement special management to protect this important status.
6. **Emigrant Trails -** Four National Historic Trails pass through public lands managed by the Casper Field Office which are the Mormon, California, Oregon and Pony Express Trails. Obviously these four trails are of national significance, and ACEC designation would compliment the Congressional designations and allow the BLM to restrict activities in this area to those activities compatible with protecting these important trail corridors.

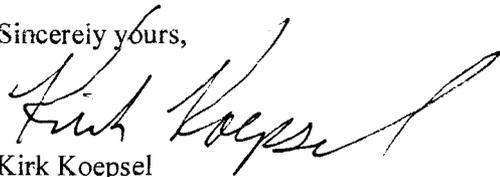
03 SEP 23 AM 11:07
 SUPERVISOR OF LAND
 CASPER FIELD OFFICE

- Teapot Dome** - An ACEC should be established in the Teapot Dome area to explain this historic importance of this area. Teapot Dome was one of our nation's worst government scandals rivaling Watergate in importance. Since the scandal centered around lands within the boundaries of the Casper Field Office, we believe that the tract of land involved in the scandal should be designated an ACEC. In addition an adjacent area which overlooks the Naval Petroleum Reserve should also be designated which should contain a picnic area with interpretive displays discussing this historic event. Because of the active oil and gas activity in the area, it may be appropriate to explain oil and gas related facilities including derricks, pump jacks, pipelines, and other common equipment used in oil fields.
8. **Pterodactyl Track**- This area near Alcova contains significant Paleontological values including very rare pterosaur tracks. Only four other locations of these tracks have been found in the world. The relevance and importance of this area has already been established because the area is a former ACEC. Its status should be upgraded to ACEC once again. In order to protect this site, special management is necessary and ACEC designation is the best way of accomplishing this protection. The dinosaur tracks in the Bighorn Basin received ACEC designation, and thus the pterosaur tracks in Alcova should receive the same level of protection.
 9. **Table Mountain** - This area contains important waterfowl and upland game bird resources, and is an important recreation area in southeastern Wyoming. Because of its important wildlife resources and this area is one of accessible areas of public land in the southeastern portion of the state, it should be considered for ACEC designation.

The Sierra Club supports the retention of Jackson Canyon as an ACEC because of its importance bald eagle habitat, but requests the removal of ACEC designation from the Salt Creek oil field. Salt Creek was one of the earliest ACECs, and although areas that are considered environmental hazards can be designated ACECs, we do not believe that the designation has helped at all in expediting the clean up the Salt Creek area. Although Salt Creek is one of the oldest oil fields in Wyoming we do not believe that it differs greatly from other aging oil fields in need of clean up and thus fails to meet the importance criterion that all ACECs must meet.

We appreciate this opportunity to provide early input into this planning effort.

Sincerely yours,



Kirk Koepsel
 Senior Regional Representative



The State
of Wyoming



Department of Environmental Quality

Dave Freudenthal, Governor

Herschler Building • 122 West 25th Street • Cheyenne, Wyoming 82002

ADMIN/OUTREACH	ABANDONED MINES	AIR QUALITY	INDUSTRIAL SITING	LAND QUALITY	SOLID & HAZ. WASTE	WATER QUALITY
(307) 777-7758 FAX 777-3610	(307) 777-6145 FAX 777-6462	(307) 777-7391 FAX 777-5616	(307) 777-7368 FAX 777-6937	(307) 777-7756 FAX 777-5864	(307) 777-7752 FAX 777-5973	(307) 777-7781 FAX 777-5973

July 29, 2003

Through: WY State Planning Coordinator's Office

Ms. Linda Slone
Casper RMP Project Manager
BLM Casper Field Office
2987 Prospect Drive
Casper, WY 82604

RE: BLM Casper Resource Management Plan Revision

Dear Ms. Slone:

The Air Quality Division of the Wyoming Department of Environmental Quality has reviewed the June 2003 Scoping Statement. As a result of that review the Air Quality Division identified some issues and concerns that should be addressed in the review and modification of the Casper RMP.

- Fire**

The Casper RMP should address where and under what conditions fire should be used as a land management tool and what areas should be identified for full suppression, limited suppression, and no suppression of wildfire. In addition, the BLM should take into account smoke impacts (i.e., public health, nuisance, and visibility impacts) associated with fire, as well as the minimization of fire emissions and smoke impacts to the maximum extent feasible.
- Air Quality Management Objectives and Actions**

The Air Quality Division is cognizant that existing RMPs contain Air Quality Management Actions, which BLM may carry forward into the revised RMP, that imply a certain BLM authority over air quality. The primacy for air quality under the Clean Air Act has been granted to the State of Wyoming and in two appeals of the Fontenelle and

Ms. Linda Slone
BLM Casper RMP Revision
Page 2

Moxa Arch Records of Decision, the BLM conceded that it lacked authority over air quality. As such, the Air Quality Division is submitting the following comments so that the RMP may be revised to eliminate Air Quality Management Actions that are beyond the BLM's authority.

To ensure that the BLM does not imply a certain authority over air quality the phrase "within the scope of the Bureau's authority" should be added to the Air Quality Management Objective and/or Air Quality Management Actions as necessary. For example, Management Objective "...minimize emissions, within the scope of the Bureau's authority, that cause acid rain or degraded visibility." and Management Action "Requirements, within the Bureau's authority, would be applied...".

The authority to limit emissions and/or require emissions controls lies with the State of Wyoming. As a result, all references to "limiting emissions," "covering conveyors," etc. should be removed from Air Quality Management Actions. If the State determines that it is necessary to regulate emissions, it will do so through its State Implementation Plan (SIP) for air quality by promulgating appropriate rule. The Environmental Protection Agency has oversight responsibility during this process and will approve the State of Wyoming SIP for air quality.

Air Quality standards and guidelines are developed and established by the State of Wyoming as required by the Clean Air Act not the BLM. Therefore, any Air Quality Management Action referring to the "development" of air quality standards and guidelines should be deleted entirely from the RMP.

If you should have any questions on the above comments and concerns, please feel free to contact this office.

Sincerely,



Darla J. Potter
Visibility, Smoke Management, & EIS Coordinator
Air Quality Division

cc: Dan Olson, Administrator Air Quality Division
Cara Casten, Air Quality Engineer

04:01:10 02 JUN 00
MAY 20 10 10 AM '00
MAY 20 10 10 AM '00



"foncie"
<foncie@mymailstation.com>

To: crmp_wymail@blm.gov
cc:
Subject: Linda Stone, RPM of BLM

07/28/2003 09:09 AM

Dear Linda,

July 28, 2003

It has come to my attention that you would appreciate comments from the public concerning the preservation of the Public Lands Trust.

In earlier attempts to make my feelings known to government entities, I have been asked, "What's your interest in Wyoming when you live in North Carolina?"

I have made four trips to the state of Wyoming in general as well as around the Platte River: 1958, 1974, 1998, and 2002. To see the Oregon/Mormon trails snake across the landscape, to hear the quiet broken only by the whisper of wind in the grasses and an occasional raspy call of a hawk, or the whistle of a marmot, to sit on the bank of a rushing river rapid, to behold a butte rising up out of otherwise flat ground, to touch remnants of wagon train parts at a river's ford (which were there in '74, but gone in '02)...all enriched and enlarged my sense of our country. These things and innumerable more I could show my eastern son, reinforce his nation's history, and teach him the value of preserving the lands left in trust for others to come and experience in the future.

To do other than preserve the Public Land Trust managed in the public interest would be a travesty in huge proportions. During the last week, we have seen and heard about the foresight of the man who saved 800+ acres in the middle of New York City. It is now the anniversary of Central Park where children have been able to experience sitting in the shade of trees and playing on grass since the late nineteenth century.

As a resident of North Carolina, I have an investment in the preservation of historic trails, archeological sites, and the habitat of wildlife that are a part of the heritage of our nation's people, found throughout our land as well as Natrona, Converse, Goshen, and Platte Counties. Please have the courage to stand up to the demands of those with special interests, deep pockets, political ambitions, or religious pressure and keep our Public Land Trust whole and managed in the public interest.

Sincerely,
Florenc L. Williamson
7905 Yester Ct.
Raleigh, N.C. 27615



"Mahlon Frankhauser"
<m.frankhauser@att.net>

07/28/2003 09:56 PM

To: <crmp_wymail@blm.gov>
cc:
Subject: Preserving Wyoming's History and Wilderness

Though we have never visited this beautiful part of the country, we have certainly enjoyed viewing the scenery in pictures and on videos and in movies etc. We have spent many enjoyable times in other areas of the mid-west. We hope and pray that the preservation of this area will be accomplished for not only the present generation, but for all the future generations to come. This is a national problem here in our beloved United States of America. People are not thinking ahead, but just of the present and development at any cost. And the cost will be devastating! Once these areas are gone, they are gone forever. We shall fervently pray for the success of your mission!

Mahlon and Joan Frankhauser



"Bonds, James"
<James.Bonds@fhwa.
dot.gov>

To: <crmp_wymail@blm.gov>
cc:
Subject: Casper RMP

07/15/2003 02:58 PM

Good afternoon,

Could you add my name to the mailing list please. I am interested in the update to the Casper RMP.

James T. Bonds
Federal Highway Administration - Wyoming Division
1916 Evans Ave.
Cheyenne, WY 82001

(307) 772-2004 ext 42

james.bonds@fhwa.dot.gov

Thank you

BJORK • LINDLEY • LITTLE • PC

LAWYERS' FICE

03 NOV 17 AM 11:07

PETER A. BJORK†
LAURA LINDLEY
DAVID R. LITTLE
ROBERT C. MATHES†
DARIN B. SCHEER†
CHRISTOPHER G. HAYES**
ANN M. EASTBURN*

*Of Counsel
*Special Counsel
†Also admitted in Wyoming
†Also admitted in Louisiana

November 14, 2003

Bureau of Land Management
Casper Field Office
2987 Prospector Drive
Casper, WY 82604

Attention: Ms. Linda Stone

Re: Casper RMP Revision

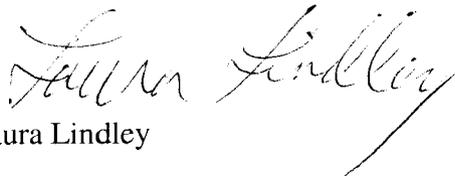
Dear Ms. Stone:

This letter responds to BLM's Scoping Notice with respect to the proposed revision to the Casper (formerly Platte River) RMP. The timing of the plan revision presents an excellent opportunity to incorporate the EPCA inventory results into the plan decision. We urge you to provide realistic opportunities for the development of oil and natural gas from federal lands with only necessary restrictions on surface use. In particular, we recommend that the reasonably foreseeable development (RFD) scenario analyze sufficient potential development so that the document will have a useful life for planning purposes. However, the plan should emphasize that the RFD is used only as a tool to analyze potential impacts and does not constitute a cap or decision limiting the amount of development which may occur in the resource area.

Thank you for your consideration of these comments.

Very truly yours,

BJORK LINDLEY LITTLE PC



Laura Lindley

*forward to SAIC
11-17-03 lma*

LL/dfi



Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: CASPER

Date: 11/13/03

Thank you for your input.

PLEASE PRINT LEGIBLY.

WE'RE EVALUATING THE FEASIBILITY OF CONSTRUCTING
A WIND FARM @ TEAPOT DOME (NPR3).

IS THIS OF INTEREST TO YOU ?

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME:	<u>MIKE TAYLOR</u>	<u>261-5000</u>
ORGANIZATION:	<u>DEPT OF ENERGY</u>	
ADDRESS:	<u>907 N. POPLAR STE 150</u>	
CITY/STATE/ZIP:	<u>CASPER, WY</u>	

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

Please hand this form in or MAIL (post-marked by November 20, 2003) to:

BLM Casper Field Office
 2987 Prospector Drive
 Casper, Wyoming 82604-2968
 Attn: RMP Revision



Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: Casper, Wyo.

Date: Nov 13, 2003

Thank you for your input.

PLEASE PRINT LEGIBLY.

Fact Sheet 3 - Preliminary Planning Issues Item B
Access to and transportation on BLM lands needs
to include equestrian use as an acceptable ~~use~~
means of transportation on all BLM land.

Fact Sheet 4 - Recreation - Equestrian use
needs to be included as an acceptable form of
recreation on all BLM land.

*** CONTINUE ON BACK FOR MORE SPACE ***

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NAME:	<u>Edward J. Birgenheier</u>
ORGANIZATION:	<u>Pathfinder Backcountry Horsemen of America</u>
ADDRESS:	<u>Box 2557</u>
CITY/STATE/ZIP:	<u>Mills, Wyoming 82644</u>

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

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 2987 Prospector Drive
 Casper, Wyoming 82604-2968
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*forward to
 SAR 11-17-03
 lma*

03 NOV 17 AM 11:00
 BUREAU OF LAND MANAGEMENT
 CASPER FIELD OFFICE
 Appendix B
 Page 94 of 147



Written Comment Form

Casper Field Office Planning Area

Resource Management Plan (RMP) Revision Process



Location: CASPER

Date: 11/13/03

Thank you for your input.

PLEASE PRINT LEGIBLY.

EXPANSION OF THE POISON SPIDER ORV PARK. UTILIZATION IS VERY HIGH. OVERUSE IS EMINANT. SOME ACRES PREVIOUSLY UTILIZED WAS FENCED-OFF. ADDITIONAL ADJACENT BLM ACRES IS THERE. EXPANSION ASSISTANCE IS AVAILABLE FROM 3 SPECIAL INTEREST GROUPS THAT UTILIZE THE AREA. EXPANSION CAN BE ACHIEVED BY REVOCATION / REMOVAL OF EXISTING FENCED BOUNDARIES.

*** CONTINUE ON BACK FOR MORE SPACE ***

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NAME: DANIEL STRAKA
ORGANIZATION: CASPER DIRT RIDERS, WY MOTORCYCLE TRIALS ASSOC.
ADDRESS: 3688 RIDGECREST DRIVE
CITY/STATE/ZIP: CASPER / WY / 82604

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

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2987 Prospector Drive
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Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: Casper

Date: 11/13/03

Thank you for your input.

PLEASE PRINT LEGIBLY.

more water development on public lands
to benefit ~~the~~ livestock & wildlife.

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME:
ORGANIZATION:
ADDRESS:
CITY/STATE/ZIP:

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

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Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: Casper

Date: 11-13-03

Thank you for your input.

PLEASE PRINT LEGIBLY.

On access to the BLM land out NORTHEAST OF CASPER: I'm one of the landowners out there, and while I do my little bit on my own place for a few winters, I'm not willing to allow the wide world to go back onto the other ranches out there. That would be crazy.

I don't know what to do to fix it out there, but I have heard people suggest that the Area 25 season is too long and the area is too big. The Game and Fish might look into two or three short seasons moving across the area. They might make things more manageable that way. I've also looked at the Walk-in access program, but it seems to be aimed at bigger places than mine and places that are used more.

You don't have to leave recreational areas or facilities open all the time, either. You could close ATV areas periodically.

OVER →

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME:
ORGANIZATION:
ADDRESS:
CITY/STATE/ZIP:

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- No, do not include my name and address on the mailing list.

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 2987 Prospector Drive
 Casper, Wyoming 82604-2968
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I agree with what was said in the meeting about your
wanger. He shouldn't be working such a huge area alone.
I can't believe that the BLM would expect him to. Whoever
decides those things must be pretty naive.

I am a bit concerned about cheat grass, too, though it just
occurs in patches and islands, both on BLM and private land
out there.

Though I have found the Casper Office very pleasant and
workable, I have been annoyed for a long time about the
subleasing issues. I think the state's policy is far more fair.
(I've already complained about that someplace else.)

In general, I haven't minded having BLM land at all...

Billie Donovan

#2

November 13, 2003

Area 32 Unit-C&f.

Winter Habitat for antelope is in severe decline. Problem is that the heavy migration from Areas 47-48&31 in winter. Result is too many animals (antelope) that place severe stress on winter range. Resulting in severe winter range deterioration- especially shrub components.

Need to: reduce stress on range & that equates to reducing (managing) antelope.

OHV Trail- designated & designed.



Written Comment Form

Casper Field Office Planning Area Resource Management Plan (RMP) Revision Process



Location: Wheatland

Date: 11-10-03

Thank you for your input.

PLEASE PRINT LEGIBLY.

Wants BLM to become far aggressive
with biological control of noxious weeds.
Spray - Coercity has done this - losing ground. Additionally,
~~need to~~ kills Mt. Mahogany + grass + forbs.
* Need to introduce biologics into system.
~~Not Shown in City List + Beat.~~

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME: Mr. Elice Mc Colloch
ORGANIZATION:
ADDRESS:
CITY/STATE/ZIP:

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

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Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: Wheatland

Date: 11/10/03

Thank you for your input.

PLEASE PRINT LEGIBLY.

For prescribed fires it may be more efficient to burn a larger area @ a time - may need to be cooperative between BLM & G&F & landowners
 ↳ would be a more efficient for wildlife & would be more efficient financially

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME:	<u>Clyce M^cCallloch</u>
ORGANIZATION:	<u>JY Ranch</u>
ADDRESS:	<u>Box 125</u>
CITY/STATE/ZIP:	<u>Wheatland, WY 82201</u>

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

Please hand this form in or MAIL (post-marked by November 20, 2003) to:

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 2987 Prospector Drive
 Casper, Wyoming 82604-2968
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Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: Wheatland

Date: 11/10/03

Thank you for your input.

PLEASE PRINT LEGIBLY.

Likes things just like they are
Has grazing allotments

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME:	<u>Joe Johnson</u>
ORGANIZATION:	<u>Joe Johnson Co.</u>
ADDRESS:	<u>29 W. Johnson Road</u>
CITY/STATE/ZIP:	<u>Wheatland, WY 82201</u>

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

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Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: Wheatland

Date: 11-10-05

Thank you for your input.

PLEASE PRINT LEGIBLY.

I believe the BLM is running the public lands as well as it can be. I would like to see it remain the same. My ranch has about 12,000-13,000 acres, of which about 60% is BLM. My deeded ground is interspersed among the BLM. I would not like to see the public land put up for sale because I don't think I could purchase it at market value. I would like to see it remain the same.

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME:	Bernard R. McGuire Jr.
ORGANIZATION:	Rancher
ADDRESS:	4398 Palmer Canyon Rd
CITY/STATE/ZIP:	Wheatland WY 82201

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

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Written Comment Form

Casper Field Office Planning Area

Resource Management Plan (RMP) Revision Process



Location: Wheatland

Date: 11-10-03

Thank you for your input.

PLEASE PRINT LEGIBLY.

1. wants grazing lease to stay the way it is now.

2. Will not allow access for hunting across your his private land

3. If lease comes up for sale, wants to have 1st right of approval, refusal. 120 ac

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME:	Tom Pruitt
ORGANIZATION:	
ADDRESS:	
CITY/STATE/ZIP:	

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

Please hand this form in or MAIL (post-marked by November 20, 2003) to:

BLM Casper Field Office
2987 Prospector Drive
Casper, Wyoming 82604-2968
Attn: RMP Revision

November 10, 2003

Clyce McCulloch- Jy

BLM needs to react to prescriptions when window is offered.

Ryan Amundsen- Area EA for Richeau Hills that addresses prescriptions in Mahogany on a landscape base.

BLM should get more aggressive with biological control of noxious weeds.

-Land tenure Adjustment for small isolated Tracts.

-Access Across PVT. Land to reach public Lands.

P1

12 Nov 03

@ Douglas, Jay

BLM CFO Resource Management Plan Revision

Here are my issues / concerns as an individual user of The Public Lands in the CFO.

Nat.
Importance
Facilitate
Mineral
development

- Concern: From a national view mineral development is the most important resource in the CFO Resource area. Need to

1. Clearly ID those areas where mineral development / resources exist - place a focus on facilitating and encouraging Coal & Oil and Gas - uranium.

2. Require reasonable coordination with other resources - Rec. wildlife & grazing

3. Make clear the temp. impacts of mineral dev is acceptable - restore T&E habitat & other wildlife habitats - ok to Temp. impact the individual animals - replace habitat in reclamation

4. Minimize amount of roads, do not allow above ground powerlines greater than 33kV, only gravel all weather roads.

P2

Special
Area
Little Medicine
falls

Issue & Concern: Make the B2m lands
@ Little Medicine Falls a special
area. ACEC --- Focus on Rec.

do not encourage additional levels of use,
but provide access, parking, light
grazing only, sign ~~the~~ property lines.

This is truly a special and unique
area.

Ft. Fetterman
&
Mont. Bow
Rd.

Issue/Concern: Fort Fetterman & Little
Medicine (Box Elder) Roads - Historic
travel ways - manage / protect as
such. Also set standards on the
Fort Fetterman - Rock River utility
easement. < Protect & Interpret while
allowing today's uses.

signs
implying
put
ownership.

Issue/Concern: Ranch signs on public lands
, example Pathfinder Ranch signs, that
imply put ownership - Put a stop to this
this implication that the public lands are
private / use only by permission of the ranch
owner. Require a charge permit for all
signs on public lands -

Esoterbrack
townsite

Issue/Concern: Sell at high bid the lots in the Esoterbrack townsite. Expansion of the Esoterbrack townsite is limited / controlled by law / constraint because few tracts are available on the market - make the lots of Esoterbrack available.

Isolated
tracts

Issue/Concern: Scatter and isolate tracts of public lands. Use 640 acres as "small tract" - Sell at public open bid - unless they have "special values for wildlife, minerals, Rec."

This will do much to:

1. reduce Administration cost
2. Increase county tax rates
3. Get out of Put landowners 2 times.

land
exchanges

Issue/Concern: Land Exchanges (

- do an adjustment plan - areas to build on - areas to move out of - areas that could go either way - base a program on this.

- Solidify ownership
- Eliminate scatter tracts
- Require Access to public lands

- - -

Boundary
lines
to facilitate
public
access

Issue/Concern: Post / mark property lines so that public land visitors may more effectively use the public lands.

- Property Bdy signs
- Sign Access points

Provide
access
points

Issue/Concern: Provide Access points a place to park that has bdy signs etc - connect the people with the land.

Horse
use

Issue/Concern: Provide horseback riding opportunities - an array - within 1 hr of Casper. There are a great number of horseback users in Casper / glenrock provide a place for them to go ride.
Re: Backcountry Horsemen of America Casper, Cheyenne.

Access
to
public
land

Issue/Concern: Many tracts of public land that are of significant size do not have public access to them - do not have to be able to drive all over them, just drive to them, obtain access, sign out have a place to park

ATV
USE

Issue / Concern: ATV use off roads is a quickly growing and often ("~~Range~~ Lawless") activity:

1. Prohibit off road vehicle use except in designated areas - including grazing users

2. Provide some ATV opportunities - mostly on low std. roads. Also some off road areas.

3. Prohibit ATV use on trails & trails except where specifically allowed.

4. Require they be no louder than some set noise level.

water
rights

Issue/Concern: Do not allow anyone to hold a livestock water right except the U.S.A. - Control the H₂O Control the range

oil
production
pits

Issue/Concern: Do not allow any "pits" for oil & gas production, i.e., no new production pits - none --

Pasture
size

Issue/Concern: Deal with Pasture size as a method to provide diversity across the landscape. Set a standard there will be no net reduction in Average pasture size this will:

1. Provide biological diversity
2. Maintain Recreation opportunity
3. Eliminate or at least minimize impacts to wildlife from fences - Big Game mortality - Bird / sage grouse mortality

electric
fences

Issue: Electric fences are bad deal should be limited to true temporary use allow one time at a place for no longer than 6 mo. - unacceptable conflict with public use.

Historic
trails

Concern: Provide Historic Integrity of
The Historic travel ways, i.e., California
Oregon, Mormon, Pony Express -- - maintain
visual & physical integrity - do some
interpretation -- also be specific about
what is compatible uses - roads powerlines
waterlines etc --

1. Where road have overlaid trail
don't dis allow upgraded, traffic, heavy
utility corridor.

2. Protect pristine "ruts" / station
sites.

3. Encourage public use by marking
routes - have areas where

- ↳ people can drive vehicles
- ↳ Ride horses
- ↳ walk

 down segments of the trail.

4. Encourage Historical "re-enactment"

Major
travel
ways

Issue: Provide recreational opportunities for / related to historic travel ways for example

- Coordinate with other BLM- USDA-FS to ~~can~~ create a travel way people can ride from crew agency, mt to Coster

- Bates Hole Livestock driveway route for people to ride horse, Mt. Biker

Backcountry
Byways

Issue/Concern: Continue & emphasize the recreational opportunities of Backcountry Byways.

Pine
Ridge

Issue: Pine Ridge N. of Glenrock - not available - unknown - no signs
This is a truly high diversity visuals & environmental that has exceptional Rec opportunities
make these available to the public.
starts N. of Glenrock - goes over to I-25 -- Bad lands (same sort of) pine rock formation - excellent Big game.
Make emphasis even.

Vastness

Issue: One of the major environmental values the public lands have is vastness - big open areas. These vastness values need to be protected

- ✓ Limit Pasture size keep Big
- ✓ Visual mitigation requirements
- ✓ Limit Roads - have road density standards
- ✓ Require appropriate Reclamation at the end of projects (oil-gas etc) restoring "vastness"

Recreation events

- Concern issues: Recreation events
Prohibit those recreation events that are not related to the natural resources
for example

- : Competitive riding events that only require a place - motorcycle races - endurance horse races - -
- : Para-military events
- :

P. dogs

Issue: Provide the recreational opportunities of P. dog shooting

- ✓ scarce activity
- ✓ can be major local economic development factor.

Submitted 12 Nov 03
J. P. Redent
an individual user
of CFC Public Lands.



Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: DOUGLAS

Date: 11-12-03

Thank you for your input.

PLEASE PRINT LEGIBLY.

- These ARE suggestions to consider in doing your RMP update.
- ① I strongly recommend disposing of scattered parcels of BLM LANDS. The RATIONAL for this is that BLM doesn't have personell to offer ANY MANAGEMENT and these LANDS if privately owned, would add to the TAX base of the STATE.
 - ② I also oppose ANY MORE LAND acquisition by BLM.
 - ③ It is a mistake to make the public AWARE of items or sites of interest (Archelological / Historic / Cultural / Ect.) as this INVAROUBLY LEADS to looting & DAMAGE. MANY sites would be better protected on privately owned LANDS.
 - ④ CBM developement, while necessary and beneficial, still poses problems - SURFACE DAMAGE & WATER disposal being TWO of the most important. Also undoubtedly some domestic & stock wells will be impacted. MANY existing wells ARE producing FROM COAL SEAMS. Artesian wells ARE AT GREAT RISK!
 - ⑤ Multiple uses of BLM LANDS must be maintained. Productive Industries such AS Agriculture, mining, oil & GAS, Timber, (Forest Management)

*** CONTINUE ON BACK FOR MORE SPACE ***

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over

NAME:	G. Eugene "Gene" HARDY
ORGANIZATION:	HARDY Enterprises LTD. dba: HARDY RANCH
ADDRESS:	181 Jenne TRAIL Rd. DOUGLAS, WY. 82633
CITY/STATE/ZIP:	DOUGLAS, WY. 82633

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

already on list

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 2987 Prospector Drive
 Casper, Wyoming 82604-2968
 Attn: RMP Revision

03 NOV 18 4:10:50

etc. should be prioritized over some of the more "Radical" uses. I do not oppose Environmental protection but insist it be based on sound Scientific Science.

- ⑥ Better invasive weed control is a must!! It is spreading on Well Locations, pipe Line easements and BLM Land in general.
- ⑦ Encourage more water developments for Livestock & Wildlife.
- ⑧ Restrict as much as possible the use of motorized vehicles (ATV) in particular, on BLM Lands except on established Trails & Roads.



Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: Douglas

Date: 11/17/03

Thank you for your input.

PLEASE PRINT LEGIBLY.

We in Converse County ARE very concerned about the Coal Bed Methane discharge water. At one time it was suggested this discharge would be into Antelope Creek and on into the Cheyenne River. This is not a good idea for many reasons. We suggest it be piped to the Platte River near Glencoe for replacing water "owed" to NEBRASKA

MAXVIN Applegquist of Wyoming Farm Bureau has proposed an idea for the problem of abandoned oil & gas wells, a lot of them on BLM land. His idea is to convert them to water wells (a lot have water in them now), to add AUM's and wild-life numbers to ~~BLM~~ BLM lands. This idea has merit, for one thing, it would be cheaper than drilling new wells and would add value to our state.

*** CONTINUE ON BACK FOR MORE SPACE ***

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NAME:	JESS Rodgers
ORGANIZATION:	Converse Co. Cons. Dist Chair - Converse County Farm Bureau Pres
ADDRESS:	286 BRAAG ROAD
CITY/STATE/ZIP:	Douglas, WY 82633

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

Scoping Committee Member

Please hand this form in or MAIL (post-marked by November 20, 2003) to:

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 2987 Prospector Drive
 Casper, Wyoming 82604-2968
 Attn: RMP Revision

NOV 18 2003
 11:11 AM
 RECEIVED

Archie Bruner
 300 Brase Rd.
 Douglas, Wy. 82633
 Nov. 12, 2003

BUREAU OF LAND
 MANAGEMENT
 CASPER FIELD OFFICE

03 NOV -6 PM 1:40

UNITED STATES DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
 Casper Field Office
 2987 Prospector Drive
 Casper, Wy. 82604-2968

RE: Preparation of Casper Resource Management Plan

Dear Managers:

Preliminary Planning Issues

- A. For the sake of future generations, conservation should be considered. Statistics do not tell us what to do, they tell us what we are doing. Simplicity, standardization, and stabilization are important.
- B. We should not trample or misuse land. Some mistakes fall under the heading of freedom and economic development.
- C. Resource conservation is good management.
- D. Wildlife is not the foundation of domestic agriculture.
- E. There is a process of evolution man has no control over. Respect nature's support of livability.
- F. Problem plants should be controlled beneficially.
- G. Sustainable agriculture is paramount.
- H. All land should adhere to futuristic benefit.
- I. Be cautious and responsible.
- J. Livestock should be tied to domestic agriculture.
- K. Much of economic development is not visual or realistic resource.
- L. The movement of elements among plants, animals, organisms, soil, water, and air is the natural recycling foundation of life (it is THE ecologic system). Aggressive industry and human interference distract from quality air, water, health, food, and shelter. Hauling the crop off of land or any disturbance of elements from their original cycles is detrimental. Theories of science do not supersede the facts of life. Domestic agriculture presents an opportunity to support nature's bounty. The industrial world is a long way from domestic agriculture ("the hoe and spinning wheel" was domestic agriculture). Industrial economics and population stabilization are difficult to handle. The first commandment does not give us freedom of religion. God is the ultimate power.

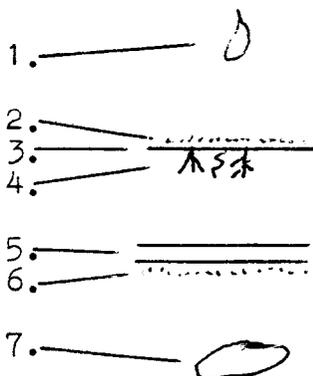
Respectfully,
Archie Bruner

LAND USE AND
 ENVIRONMENTAL
 OFFICE

June 1, 2000

Fundamental Process Of Nature

03 NOV -6 PM 1:40



1. Precipitation gives us water.
2. Elements contained in plant and animal waste carried down by water.
3. Earth's surface.
4. Roots of vegetation filter elements out of water.
5. Sewer and waste systems that place elements away from the root zone.
6. Elements carried to ground water.
7. Ground water feeds our springs and wells.

Industrial waste and clutter contaminate nature's process. Wasted resources cause hardship for future generations.

The fundamentals of nature should be the foundation of land use and economic development to protect air, water, soil, and future life.

Archie Bruner

BUREAU OF LAND
MANAGEMENT
CASHIERS OFFICE

03 NOV -5 PM 1:40

"From dust thou art to dust returneth", the Bible says.

All organic things are composed of elements, either directly or indirectly, from the soil. These elements need to return to the soil to recycle life under the laws of nature, which God created. Man cannot change Gods' law.

Agriculture is the management of elements to give people food, shelter, and exercise, which are the fundamentals of human life. Agricultural fundamentals is the foundation of life. We should get exercise maintaining food and shelter (basically).

Domestic agriculture gives us the opportunity to conform to nature. This country was founded and expanded with domestic agriculture. Maintaining soil productivity and resource conservation should be the first concern of economics, politics, and religion. Depleting the soil and waste of resources is vandalism.

Commercialization has presented resource wasteful methods in the support of life.

The industrial world has a long way to go to reach domestic agriculture. Some people and some institutions are not very adaptable. Historically, people have abused agriculture. The industrial world is in limbo.

New ways to do things is not success. Good ways to do things is success.

Tolerance? We must tolerate Gods' law.

LET'S KEEP POLITICS IN PERSPECTIVE

Making a living without imparing future generations is the story of success. Resource conservation is the ink which records the story. Simplicity and standardization is the bottle which holds the ink. The hoe and spinning wheel are conservative tools, (in capable hands).

Plants feeding animals and animals feeding plants is a fundamental of life. The natural recycling of organic material is the crutch of life everlasting. Domestic agriculture presents oportunity.

Managing plants and animals for food and shelter is the primary task of people. As we escalate our liberty we energize our justice.

Integrity is following a futuristic goal.

The world responds to kindness and respceability.

God provides us with every headacke we bargain for and every bit of bread we earn.

03 NOV -6 PM 1:40
OFFICE



"JAMES HINES"
<Wolf82553@msn.com
>

To: <crmp_wymail@blm.gov>
cc:
Subject: platte river rmp

07/28/2003 08:56 PM

Please add my name to the Platte River RMP mailing list.

Thank you,

James Hines
P.O. Box 6058
Ventura, CA 93006

From Public Scoping Comment Database

Michael J. Markus
Director
Natrona County Development Department
120 West First, Suite 200
Casper, WY 82601
3074738517
3072359396
3072359436

Natrona County is a Cooperating Agency in the preparation of the RMP. I have been designated by the Board of County Commissioners to represent the County during this project.

The 1998 Natrona County Development Plan, which has been provided to BLM, includes a "Federal Lands and Resources Policy Plan" chapter. This Chapter recognizes the reliance of the County tax base on resources such as oil and gas, as well as providing recreational opportunities for Natrona County residents and visitors. It is clear that decisions that will be made as the result of the RMP will have long-term impacts to the economic stability and tax base of Natrona County.

The County would look to include the findings and conclusions of this RMP effort into potential updates of land use planning documents in the County, including the County Development Plan and the current update of the Casper Mountain Plan.

Potential new issues which Natrona County could face and that would have impacts on the local economy and wise land use planning are wind energy, coal bed methane, and CO2 production (such as the Anadarko project).

As the County representative for this effort, I appreciate the opportunity to provide comments and provide a broad based County perspective.

Michael J. Markus
Director
Natrona County Development Department
120 West First, Suite 200
Casper, WY 82601
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CFO Website Comments

Daniel Straka
WY Motorcycle Trials Assoc and Casper Dirt Riders
3688 Ridgecrest Drive
Casper, Wyoming 82604
bike4fun@juno.com

Recreational OHV users in the Casper District of the BLM have it pretty good and they know it. They all seem to be aware of the Poison Spider ORV Park. Even those new to this form of recreation seem to find out about it pretty quickly. The BLM has seen fit to allow unrestricted OHV use at the Poison Spider bentonite pit for as long as I can remember. A few years ago it was officially named the Poison Spider ORV Park. Since then many improvements have been made at the site in the way of amenities such as a toilet", picnic table and a trash receptacle. Twice a year special interest groups get together there along with BLM personnel to assist with general **maintenance and beautification**. I have seen as many as 30 vehicles parked out there on weekends, which translates to a lot of motorcyclists, ATV riders and four-by-four enthusiasts utilizing the area. It is in fact over utilized when conditions like this exist. With a mix of OHV types and riders which include children and adults alike **safety can become an issue**. I would like to propose that an expansion of this facility be included in the new RMP to address the utilization issue here. I have determined that there are adjacent BLM parcels West of the current boundaries that can be utilized to add an additional 80-240 acres to the area. This would serve to reduce the congestion issues that occur here on the weekends. An 80 acre expansion was submitted 4 or 5 years ago to the BLM for consideration and was well received **however no action was taken**. In addition to expanding the existing ORV Park, I would like to suggest that another parcel of BLM land be designated for OHV use so the user community has **another destination choice**. I would like to make one additional suggestion, with regards to how the area(s) are named. While the term Off Road Vehicle was acceptable when the park was first named times have changed, and ORV now carries a degree of negativity along with it. Because of this, the parks should be renamed to Off Highway Vehicle (OHV), which does not seem to carry any negativity with it.

CFO Website Comments

Keith Parmely
Casper Dirt Riders
4011 Cynthia Drive
Casper, Wyoming 82609
kjjep@iglide.net

These questions will be for land that is open or available for off-highway vehicle use. With the increasing use of Posin Spider Off-Highway Vehicle Park, it would be much safer to ride with the Park expanded.

Is there any other land available for another Off-Highway vehicle Park in ADDITION to Posin Spider? It's my understanding that the only trails for motorcycles is near Story & Posin Spider OHV Park ?

Is it possible for our club to have input into new or establishing new trails for motorcycles? Are Places like Deer Creek , Esterbrook , Bates creek & such available for \"designated\" trails ? Will the proceeds from the sales of the OHV Stickers be used to establish new trails for OHV use

If there is land available for off-highway vehicle use, & or new trails can be established or designated, how can we get involved ?



Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: CASPER

Date: 11-20-03

Thank you for your input.

PLEASE PRINT LEGIBLY.

1. BLM offices need to be more diligent in monitoring grazing allotments. I know that many leaseholders overgraze, and with our drought situation, the wildlife has less to eat since the land is overgrazed.
2. BLM offices also need to be more diligent in monitoring ORV (off-road vehicle) use. The land gets really taken up (especially in this field office area), due to the ease of getting off-road in this desert-type, flat landscape. BLM needs to do much more education so people understand what this type of recreation does to the land.
3. Muddy Mountain is very underutilized by the general public. Picnic areas seldom seem to be used. Even the campgrounds are underutilized. Maybe the Casper Office could remind the public (through T.V. + radio) that there is a very nice area there right in Casper's own backyard.

*** CONTINUE ON BACK FOR MORE SPACE ***

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NAME: <u>JEANNE LESKE</u>
ORGANIZATION:
ADDRESS: <u>2001 NEWPORT</u>
CITY/STATE/ZIP: <u>CASPER, WY. 82609-3803</u>

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

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 2987 Prospector Drive
 Casper, Wyoming 82604-2968
 Attn: RMP Revision



Written Comment Form

Casper Field Office Planning Area Resource Management Plan (RMP) Revision Process



Location: _____

Date: _____

Thank you for your input.

PLEASE PRINT LEGIBLY.

As manager of Springfield Ranch I would like to comment on some areas of the RMP which will affect our business.

Part of our land is located in the Richear Hills area of Platte Co. I was very impressed with the range improvement that occurred due to the prescribed burn that was done in 2001, and 2002. Part of the 2002 burn took place on our private property and the benefit to both wild life and lives stock was tremendous.

Since this area contains a large amount of BLM property I feel it would be in the best interest of all involved for the BLM to proceed with more prescribed burning.

The second area I would like to address is a possible land transfer. Our lease included a 40 acre parcel in the NE 1/4, SE 1/4 of sec 25, R70.722. We would be interested in either purchasing this parcel or trading it to the BLM for a same sized tract that would be adjacent

*** CONTINUE ON BACK FOR MORE SPACE ***

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NAME: Kenneth Small (manager Springfield Ranch)
ORGANIZATION:
ADDRESS: 153 Small Rd
CITY/STATE/ZIP: Wheatland WY. 82201

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

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 BLM CASPER FIELD OFFICE

to another parcel of BLM which we have the lease
on.

Your considerations of these issues would be
appreciated.

RECEIVED
NOV 21 10 49 AM '03
CASPHER FIELD OFFICE

03 NOV 21 AM 10:49



November 19, 2003

Mr. Jim Murkin, Field Manager
Bureau of Land Management
Casper Field Office
2987 Prospector Drive
Casper, WY 82604-2968

RE: Public Comment, Casper Resource Management Plan (CRMP)

Dear Mr. Murkin:

I appreciated the opportunity to participate in the public scoping meeting held in Douglas, WY on November 12, 2003. Thank you for adding my name to your mailing list.

After review of the Final Summary of the Management Situation Analysis, I have no specific comment. However, as I noted during the meeting, the coal mining industry is an important part of our state and local economies. Antelope Coal Company (ACC) employs 270 residents of Campbell and Converse Counties. In addition, Antelope Coal Company supports a large percentage of Converse County's tax base.

While ACC supports the BLM's fundamental reasons to update the CRMP, we also wish to preserve the interests of our industry. Currently, the CRMP proposes no new standards in regards to air quality, water quality or wildlife, and we feel that the current standards protect these valuable resources. As we discussed, if more stringent standards were to be proposed they could restrict future coal mining in Converse County. In that event, those standards would need to be focal points for discussions during the CRMP process.

I look forward to future involvement with this process, as the CRMP is finalized.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick J. Baumann".

Patrick J. Baumann
Antelope Coal Company



Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: Casper

Date: 11-14-03

Thank you for your input.

PLEASE PRINT LEGIBLY.

I would like to see a more Incentive Oriented BLM Plan. for example members working with the BLM should get faster streamlined improvements and those people in the BLM weed and pest CRM should have a more understood feeding program so they should be able to pick weed free hay without paying the extra 20 to 30 dollars for Certified hay. As it is now those working with the BLM are the only ones obeying BLM rules I would like to see the public land set aside for a reason used for that reason.

① Now we are grazing land set aside for stock trail use these lands would make great landbanks or wildlife habitat if we did not graze after trail use, this would also leave feed on trail for winter trailing.

② The BLM is currently fenceing out stock trail lands for camping spots. this opens the door for all to pull lands out of trail

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME:	<u>Randy Shepperson</u>
ORGANIZATION:	<u>K S Ranch</u>
ADDRESS:	<u>7286 Salt Creek Rd</u>
CITY/STATE/ZIP:	<u>Casper WY 82601</u>

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

03 NOV 20 11 10 37

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 2987 Prospector Drive
 Casper, Wyoming 82604-2968
 Attn: RMP Revision



Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: Casper

Date: 11/16/03

Thank you for your input.

PLEASE PRINT LEGIBLY.

off highway vehicle recreation is the fastest growing activity on public lands, not only in Wyoming, but nationwide. These recreationist are riding on public lands here in the west. Simply closing public lands to OHV use to prevent damage is not an option.

Some of the things I think can improve practical OHV recreation state wide can begin in the Casper RMP.

- Create an additional OHV park similar to the Poison Spider Park within the Casper district. I not sure of a site and there may not be one that is suitable. the Poison spider Park gets more & more use.

- Create a looping ATV Trail system in areas that we know are frequented by offroad enthusiast. Some of these areas are muddy mtw/Casper mtw; Deer Creek; ESTERbrook; Glendo

- It's important to include in The RMP the ability for this district to accomadate the OHV recreational user under the new plan.

**** CONTINUE ON BACK FOR MORE SPACE ****

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NAME:	<u>J.R. Riggins</u>
ORGANIZATION:	<u>Motorized Rec. Council of Wyo / Casper Dirt Riders</u>
ADDRESS:	<u>344 Indian Paintbrush</u>
CITY/STATE/ZIP:	<u>Casper Wyo 82604</u>

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

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 Attn: RMP Revision

NOV 22 11:00 AM '03



Written Comment Form

Casper Field Office Planning Area

Resource Management Plan (RMP) Revision Process



Location: Casper

Date: Nov. 18, 2003

Thank you for your input.

PLEASE PRINT LEGIBLY.

Our ranching operation leases allotments in northwestern Natrona County. These allotments are vital components to the sustainability of our agricultural endeavor. Our efficiency is converting grass to food. The environment affects this food production. We enjoy a comfortable and compatible working relationship with BLM personnel. We appreciate this relationship and the fact that BLM bases its management goals and objectives regarding livestock grazing on an individual allotment basis. This is primary due to the diversity of allotments.

The MSA appears to be a comprehensive assessment. These written comments are intended to reply to the request for input in identifying additional issues and concerns. Many of the topics of management practices and management issues and concerns overlap. The Chapter numbers are being utilized as a guide only. These comments are intended to be used throughout the appropriate sections.

2.3 Fire Management

Prescribed fires as a management tool in our area would be questionable due to the risk of establishment or expansion of invasive non-native plant species. Pre and post

***** CONTINUE ON BACK FOR MORE SPACE *****

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NAME: Robert, Rita & Jock Campbell
ORGANIZATION:
ADDRESS: 4 Riggs Road
CITY/STATE/ZIP: Shoshoni, WY 82649

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.**
- No, do not include my name and address on the mailing list.**

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fire management would be crucial and much would depend on a cooperative approach by all landowners.

24.1.2 Wildlife

An issue and concern not addressed is predator management.

Adequate inventory and monitoring data for big game species should be addressed before developing or preparing any appropriate management plans. This should apply to all wildlife species and their habitats but especially to the big game in regard to various permitted uses.

2.7 Lands and Realty

In this RMP revision we would like to see addressed the exchange of fee land and public land. We have fee land that is surrounded by public land and we have public land surrounded by fee land. All this is within our grazing allotments. By addressing these exchanges it would make management more efficient for all entities.

2.12 Rangeland Management & 2.12.2 Current Management Practices

Maintenance is necessary for efficient management of range improvement projects. In doing this maintenance work plans for immediate repairs and long term scenarios need to be considered. In grazing allotments the weather is a determining factor. Access to these range improvements can be an issue needing to be addressed. Our concern is repairing springs. It is difficult to get vehicles and equipment into sites without doing some surface disturbance.

2.13 Recreation & 2.13.2.1 Off-Highway Vehicles (OHV)

A criterion needs to be established regarding OHV trails.

Identifying Area and Trail Designations is a concern in the identified Crucial Big Game Range following the three management categories. Attention needs to be given to ensure visitor safety.

Clarification of the statements on pages 46-47 "Each year new trails are being created by a wide range of OHV users including, but not limited to, recreational users. Once a new trail becomes established it is considered by the public to be an existing route." Do these new trails become existing road and trails?

Management becomes an issue in controlling erosion on existing trails without maintenance. Avoiding erosion problems on a new trail becomes an issue. This issue overlaps into 2.15 Soil

2.19.1.3 Woodland and Forest Communities

Aspen communities are declining. Some method to reestablish them needs to be developed.



Written Comment Form

Casper Field Office Planning Area Resource Management Plan (RMP) Revision Process



Location: Casper

Date: Nov. 18, 2003

Thank you for your input.

PLEASE PRINT LEGIBLY.

Sheet 2 of 2 Sheets

2.19.1.4 Invasive, Non-native Plant Species

It is in the best interest to continue the cooperative agreements with relevant weed and pest control districts. This is also addressed in 2.19.2.4 through 2.19.3.4. Adjacent surface owners need to have an interest in any integrated weed management program.

2.19.3.2 Riparian and Wetland Communities

Spring developments with watering facility such as storage tanks would aid in more available water for livestock and wildlife and would help achieve management objectives.

We thank you for holding the scoping meeting and the opportunity to provide written comments.

Robert W Campbell

**** CONTINUE ON BACK FOR MORE SPACE ****

Public comments submitted for this planning effort, including names and street addresses of respondents, will be available for public review in their entirety after the comment period closes at the Casper Field Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act (FOIA), you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals or officials representing organizations or businesses, will be made available for public inspection in their entirety.

NAME:	Robert , Rita & Jock Campbell
ORGANIZATION:	
ADDRESS:	4 Riggs Road
CITY/STATE/ZIP:	Shoshoni, WY 82649

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

Please hand this form in or MAIL (post-marked by November 20, 2003) to:

BLM Casper Field Office
2987 Prospector Drive
Casper, Wyoming 82604-2968
Attn: RMP Revision

03 NOV 20 AM 10:37

WYOMING GAME AND FISH DEPARTMENT



"Conserving Wildlife - Serving People"

RECEIVED
NOV 19 2003
CASPERS FIELD OFFICE

03 NOV 20 AM 10:38

November 18, 2003

WER 2419.01
Bureau of Land Management
Casper Field Office
Casper Resource Management Plan
Management Situation Analysis Summary
PROJECT ID#: 2003-085

Kyndra Miller
Wyoming State Clearinghouse
Office of the Governor
Herschler Building, 1 East
Cheyenne, WY 82002-0600

Dear Ms. Miller:

We have reviewed the Final Summary of the Management Situation Analysis for the Casper Resource Management Plan (RMP) and offer comments on that analysis, what we believe future management should include, and some recommendations to address scoping issues and concerns.

Section 2.3 Fire Management, subsection 2.3.3 Management Issues and Concerns: This program should be incorporated into planning documents that address pre-treatment and post-treatment (prescribed fire) management, which includes rest to build fuels prior to treatment and rest following treatment to facilitate vegetative recovery.

Aspen should be specifically included as a resource that will benefit from the use of fire, and fire should be actively reintroduced back into the aspen community.

It is stated that burned areas usually offer an excellent opportunity for establishment or expansion of non-native plant species. We recommend incorporation of a provision into the fire program that will allow for the use of chemicals to prevent, reduce, and/or control the potential that exists for establishment and/or expansion of these species. This provision should be programmatic in planning processes, including post-management activities following a wildland fire.

Kyndra Miller
November 18, 2003
Page 2 – WER 2419.01

Section 2.4.2, subsection 2.4.2.2 Wildlife: We recommend the BLM maintain and/or improve the following Habitat Management Plans (HMPs): Bolton Creek, Ferris-Seminole, Grayrocks Reservoir, Laramie Peak Bighorn Sheep, Rawhide Wildlife Area, Springer/Bump-Sullivan Wildlife, Table Mountain Wildlife, and Goldeneye.

In addition, we recommend creation of:

- Four additional 1-acre exclosures within the Table Mountain Wildlife Area, and proportionately manage livestock grazing AUMs to account for the existing and additional exclosures.
- A Bates Hole Habitat Management Plan, which would incorporate the existing Bates Creek Aquatic Habitat Management Plan and Bates Creek Reservoir Habitat Management Plan. This Bates Hole HMP would facilitate better management decisions focused on wildlife habitat improvements, and address population-limiting factors.
- A 33-Mile Habitat Management Plan, which would incorporate the existing 33-mile Reservoir HMP, Railroad Grade Reservoir, Bishop Waterfowl HMP, Camel Hump Reservoir Wildlife and Recreation Area, and Teal Marsh Reservoir. The newly developed 33-Mile HMP would facilitate better management decisions focused on wildlife habitat improvements, address wildlife population-limiting factors, and address recreation-related issues involving the 33-mile reservoirs.

We recommend the BLM evaluate the progress of HMP goals and objectives, on an annual basis, and provide a status report to those agencies with Cooperating Agency Status.

Section 2.4.3 Management Issues and Concerns, subsection 2.4.3.1 Fish: The BLM states that no specific management issues and concerns have been identified. There are concerns regarding aquatic resources. We recommend the BLM coordinate reservoir design and development with WGFD personnel. Furthermore, we request 50 percent of the reservoirs created meet specifications for fisheries development. To meet fish management concerns, specifications should include a minimum depth of 10 feet, fencing an amount of uplands (headwaters area) adjacent to the reservoir 3 times the size of the reservoir surface acreage (3 upland acres: 1 surface acre ratio), and reservoir designs to include erosion control structures on the downstream outlet, providing roads to access the reservoir, and the emergency spillway being seeded with native grasses.

In addition, fish management issues are tied to other sections within the resource management plan that include, but are not limited to, riparian area management, road development and management, watershed health, etc. We ask that the BLM take aquatic management issues and concerns into consideration when addressing these management topics.

Section 2.4.3 Management Issues and Concerns, subsection 2.4.3.2 Wildlife: Forage for wildlife is a concern. We recommend the BLM allocate forage resources for wildlife in order to sustain WGFD big game population objectives and other wildlife populations. This should include working collaboratively with WGFD personnel and permittees to implement vegetative restoration projects using a watershed approach to improve resource conditions in those areas to achieve those objectives.

Kyndra Miller
November 18, 2003
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The BLM refers to a general concern that wildlife managers lack adequate inventory and monitoring data for many species, hampering the development of appropriate management plans. We recommend the BLM work collaboratively with us in developing, funding and utilizing remote sensing (landscape level landcover classifications) as a basis for landscape level inventory, establishing wildlife habitat monitoring areas based upon inventories, and sharing previously collected wildlife habitat monitoring data.

We urge the BLM to make sage grouse management a priority, with management directed to improve sage grouse habitat and populations to healthy levels, thereby precluding the need for listing under the Endangered Species Act. We recommend following guidelines for sage grouse and sagebrush management set forth in the Wyoming Greater Sage-Grouse Conservation Plan (June 2003), Guidelines to manage sage grouse populations and their habitats (Connelly et al., 2000), and Wyoming Guidelines for Managing Sagebrush Communities with Emphasis on Fire Management (Wyoming Game and Fish Department and Wyoming BLM, 2002).

Section 2.7 Lands and Realty, subsection 2.7.1 Overview: It is stated that withdrawals are formal actions that set aside, withhold, or reserve federal lands for specific public purposes. We have a concern about the BLM's flexibility to do range improvements on active allotments. We recommend grassbanks be included as a withdrawal action, and be incorporated into this program. Grassbanks set aside allotments and/or portions of allotments to facilitate vegetative restoration (range improvements) projects on existing active allotments (i.e., prescribed burns, wildland fire restoration, etc.). These would provide an area for permittees to relocate livestock while vegetative treatments and/or other alternative restoration activities were being implemented on their active allotment. Furthermore, we recommend grassbanks be considered a key activity within the lands and realty program.

Section 2.7 Lands and Realty, subsection 2.7.3 Management Issues and Concerns: Land disposals can be an issue. We recommend the BLM not dispose of any public lands within and/or adjacent to Wyoming Game and Fish Commission Wildlife Habitat Management Areas, lands adjacent to the North Platte River, lands that are currently accessible to recreationists (i.e., hunters, anglers, etc.), and lands that facilitate access to larger blocks of public lands. BLM should also consider public access during realty negotiations. We request the BLM target land acquisitions, trades, exchanges, and/or easements that facilitate increased public access to the North Platte River, access to adjacent public lands, grassbank creation, and management of crucial wildlife habitats.

Section 2.8.3 Management Issues and Concerns, subsection 2.8.3.2 Oil and Gas: Oil and gas leasing is an issue. We recommend no leasing on our Department Wildlife Habitat Management Areas, that BLM add a lease stipulation that pad spacing be no less than 80 acres within crucial wildlife habitats, and no more than 10 percent of the cumulative area in crucial habitats be disturbed at any point in time. We recommend no more than 20 percent loss within a vegetative community (habitat type) to development, no surface disturbance within ½ mile of existing open water and/or riparian areas, and that directional drilling be encouraged within crucial wildlife habitats.

Kyndra Miller
November 18, 2003
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We request the oil and gas program require mitigation of impacts, including off-site mitigation when necessary, and also require rehabilitation of production and adjacent areas to pre-development conditions. We recommend the BLM not dispose of public lands where production has occurred simply because they have been developed (i.e., utilities and roads are present).

We believe the BLM's cumulative effects analysis of development (oil, gas, coal, etc.) has been inadequate in the past in individual EAs and EISs. Cumulative effects of increased development are having a substantial impact on wildlife populations. The RMP should include a detailed description of the process that will be used for determining cumulative effects of projects during the life of the RMP.

Section 2.12 Rangeland Management, subsection 2.12.2 Current Management Practices: The BLM states that 47 allotments are classified as "T" (Improve Existing Resource Conditions), 65 are classified as "M" (Maintain Existing Resource Conditions), and 416 are classified as "C" (Custodial Management). The number of allotments in the "T" categories is a concern. We recommend implementing management strategies that would improve 15 "T" classified allotments by the year 2010. We also recommend that 20 percent of all grazing allotments have an allotment management plan by the year 2015.

The BLM states that as of fiscal year 2003, 41 allotments had been evaluated for rangeland health, with 21 of these not meeting one or more of the rangeland health standards. We recommend the RMP include provisions to monitor these specific guidelines, and use the results in active management efforts to improve rangeland conditions.

Section 2.12 Rangeland Management, subsection 2.12.3 Management Issues and Concerns: We recommend the BLM manage vegetative communities for Potential Natural Community, which includes a diversity of grasses and forbs and un-even age classes of shrubs, and that management goals be based on a watershed level.

The BLM should review the status of lands withdrawn for stock driveway use, and consider creating grassbanks if the area of land would be large enough to facilitate grassbank activities. We recommend that salt and mineral locations within each grazing allotment be placed a minimum of ½ mile away from any water source and/or riparian area.

Section 2.13 Recreation, subsection 2.13.3.2 Recreation: Use of the North Platte River from BLM access is a management concern. We recommend evaluation of the North Platte River corridor for additional access site developments, and develop and publish a North Platte River float guide in collaboration with WGFD personnel. We recommend the BLM improve the road on the east side of Pathfinder Reservoir, which would include a crossing on Canyon Creek. The WGFD would like to collaboratively develop a recreational plan for the 33-Mile reservoirs.

We recommend the BLM maintain all public lands adjacent to Rawhide and Table Mountain Wildlife Habitat Management Areas as accessible areas for public use for wildlife recreation activities, and purchase, trade, and/or exchange isolated parcels of public land to

Kyndra Miller
 November 18, 2003
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augment the existing parcels that border these Wildlife Habitat Management Areas to provide additional recreational opportunities

We request the public lands within Township 23 – 24 and Range 69 –70 (Muleshoe Flats) remain intact and not be sold, traded and/or exchanged due to the valuable public access these lands provide for hunting opportunities. These lands should be actively managed for the purpose of maintaining and/or enhancing wildlife habitat and existing wildlife populations.

Section 2.16 Special Management Areas, subsection 2.16.3 Management Issues and Concerns: Maintenance of high-value areas is an issue. We recommend the BLM maintain all active Areas of Critical Environmental Concern (ACECs), Special Management Areas, and Recreation Management Areas.

In addition, we wish to nominate a portion of the North Platte River from Pathfinder Dam to Dave Johnston Power Plant as an ACEC due to its fisheries values. We would request the designation be ¼ mile on each side of the River from the high-water mark, and that a controlled surface stipulation be placed within the ACEC designated area.

Also, we wish to nominate the South Big Horns-Red Wall area as an ACEC due to its wildlife crucial winter range value, aesthetic values, and because it contains the Casper Field Office’s only curleaf mountain mahogany. We recommend the ACEC designation include a 1 mile buffer around the curleaf mountain mahogany vegetative community, appropriate livestock grazing management to eliminate competition with wildlife, and a no surface occupancy stipulation be placed within the ACEC designation.

Section 2.17.3 Management Issues and Concerns, subsection 2.17.3.1 Animals: We recommend the BLM incorporate the following list of sensitive species into the RMP, in addition to the current lists.

**NATIVE SPECIES STATUS (NSS) OF FISH AND AMPHIBIAN SPECIES
 NATIVE TO WYOMING**

09 DEC 20 AM 10:38
 DISTRICT MANAGER
 WYOMING DEPARTMENT OF GAME AND FISHERIES

	HABITAT DECLINING OR VULNERABLE	HABITAT STABLE	HABITAT INCREASING
RARE Populations are physically isolated and genetic diversity is low. Recovery is possible.	<u>NSS1</u> Hornyhead chub Sturgeon chub Suckermouth minnow Western Silvery minnow	<u>NSS2</u> Plains topminnow	

Kyndra Miller
 November 18, 2003
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	<p>NSS3</p> <p>Black bullhead Common shiner Flathead chub Lake chub Mountain sucker Plains minnow</p>	<p>NSS4</p> <p>Bigmouth shiner Central stoneroller Channel catfish Iowa darter Longnose sucker Quillback River carpsucker Shorthead redhorse</p> <p>Stonecat <i>Boreal chorus frog</i> <i>Bullfrog</i> <i>Great Basin spadefoot</i> <i>Great Plains toad</i> <i>Leopard frog</i> <i>Plains spadefoot</i> <i>Tiger salamander</i> <i>Woodhouse toad</i></p>	<p>NSS5</p> <p>Creek chub</p>
	<p>NSS6</p> <p>Brassy minnow Fathead minnow Plains killifish</p>	<p>NSS7</p> <p>Johnny darter Longnose dace Red shiner Sand shiner White sucker</p>	

DEFINITIONS (Applies only to fish and amphibians)

Status 1 Species - Populations are physically isolated and/or exist at extremely low densities throughout range. Habitats are declining or vulnerable. Extirpation appears possible. The Wyoming Game and Fish Commission mitigation category for Status 1 species is "Vital". The mitigation objective for this resource category is to realize "no loss of habitat function". Under these guidelines, it will be very important that the project be conducted in a manner that avoids alteration of habitat function.

Status 2 Species - Populations are physically isolated and/or exist at extremely low densities throughout range. Habitat conditions appear to be stable. The Wyoming Game and Fish Commission mitigation category for Status 2 species is also "Vital". The mitigation objective for this resource category is to realize "no loss of habitat function". Under these guidelines, it will be very important that the project be conducted in a manner that avoids alteration of habitat function.

Status 3 Species - Populations are widely distributed throughout its native range and appear stable. However, habitats are declining or vulnerable. The Wyoming Game and Fish Commission mitigation category for Status 3 species is "High". The mitigation objective for this resource category is to realize "no net loss of habitat function within the biological community which encompasses the project site". Under these guidelines, it will be important that the project be conducted in a manner that avoids the impact, enhances similar habitat or results in the creation of an equal amount of similarly valued fishery habitat.

03 NOV 20 04 18 PM '03
 WYOMING GAME AND FISH COMMISSION
 1000 EAST 17TH AVENUE
 CHEYENNE, WY 82002

Kyndra Miller
November 18, 2003
Page 8 – WER 2419.01

Section 2.19 Vegetative Resources, subsection 2.19.3.4 Invasive, Non-native Plant Species: We recommend the BLM change the designation from noxious weed to non-native, invasive plant species. This will facilitate management of those plant species not listed on the state noxious weed list, would allow more use of chemicals on a large scale, and would treat non-native, invasive plant species within big sagebrush/grassland, mountain shrub, grassland and riparian/wetland vegetative communities.

Section 2.21 Water Resources, subsection 2.21.3 Management Issues and Concerns: Reservoir management is an issue. We request the BLM evaluate each reservoir for multiple uses, including fisheries, waterfowl, wildlife, and livestock grazing management. We request the design of these reservoirs be such that the upper areas provide shallow water habitat (maximum of 2 feet deep), which includes emergent vegetation for waterfowl habitat.

Sincerely,



BILL WICHERS
DEPUTY DIRECTOR

BW:TC:VS:as

03 NOV 20 AM 10:38
Appendix B
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DAVE FREUDENTHAL
GOVERNOR



STATE CAPITOL
CHEYENNE, WY 82002
03 NOV 20 AM 10:38

Office of the Governor

November 19, 2003

Bureau of Land Management
Casper Field Office
Attn: Linda Slone
2987 Prospector Drive
Casper, WY 82604-2968

**Re: Management Situation Analysis Summary
State Identifier Number: 2003-085**

Dear Ms. Slone:

This office has reviewed the referenced Management Situation Analysis Summary on behalf of the State of Wyoming. This Office also distributed the referenced document to all affected state agencies for their review, in accordance with State Clearinghouse procedures. Attached are comments from the Wyoming Game and Fish Department.

This office asks that the attached State agency comments receive your due consideration.

Thank you for the opportunity to comment.

Sincerely,

Tracy J. Williams
Tracy J. Williams
Policy Analyst

TJW
Enclosures: (1)

Wyoming Game and Fish Department



WYOMING FARM BUREAU FEDERATION

P.O. Box 1348
Laramie, Wyoming 82073 • (307) 745-4835

November 19, 2003

03 NOV 21 AM 10:51

Casper Field Office, BLM
2987 Prospector Drive
Casper, WY 82604

The Wyoming Farm Bureau would like to submit the following comments for the scoping process on the BLM's Casper RMP for the Platte River Resource Area. The Wyoming Farm Bureau Federation is a general agricultural organization which represents agricultural producers throughout the state of Wyoming. Many of our members utilize lands within the Platte River RM Area for part of their operations.

Agricultural producers have expressed concern over problems associated with working with the BLM for public access management. Because of the nature of private and public lands in some of the RMP area, problems have occurred because of misunderstandings by the public as to which lands are public and which are private. There are several management options which could help mitigate these misunderstandings. In areas where land ownership can be adjusted, the BLM needs to aggressively pursue these options if there is a willingness by the landowner to trade or purchase BLM lands. In the past, some of the proposals have languished and the landowner eventually concluded the Agency is not serious about a land trade or sale. We feel the Agency should look at all possible ways to streamline this process so that it can occur in a timely manner.

Members have suggested that too much emphasis has been given to wildlife management and that more of a balance should occur in those areas where there are wildlife and livestock issues. Many livestock producers have had to change their grazing practices in order to accommodate wildlife, but the reverse hardly ever seems to occur. Many times the Agency has been forced to accommodate more wildlife than necessary because of lack of management by the game management entity.

Livestock grazing on federal lands is an important component of food production in the US. We feel that many livestock producers cannot utilize their leases or permits because of impediments created by Agency rules. An effort needs to be made by the Agency to become livestock friendly so that necessary changes to livestock operations can occur without the Agency being an impediment. Historic numbers of livestock for the state of Wyoming have shown a large decline in livestock numbers on public lands. The Agency should seek to reverse this trend and look at ways to accommodate and enhance food production on those lands.

We are concerned about the impact of invasive non-native species through out the state of Wyoming. The Agency should aggressively treat weed infestations with the most cost effective means at their disposal. We recognize that chemical treatments cause concern with some segments of the public, but if effective chemical treatments are precluded then future impacts on federal and private land will be extensive and treatment costs will be significantly increased.

BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR
SANDOZ FIELD OFFICE

03 NOV 21 AM 10:52

WyFB Comments
page 2

Threatened, Endangered, Candidate, and Sensitive species have the biggest impact on multiple use of BLM lands. We feel that lack of information relative to habitat needs of certain species have lead the Agency to restrict other economic uses on federal lands in order to “be safe” even if the Agency is unsure. We feel the Agency should be more aggressive in defending the multiple use mandate where habitat needs for listed or candidate and sensitive species is incomplete or lacking.

Water quality issues should be closely coordinated with the state of Wyoming, who has jurisdiction over these resources. Inventories and assessments of water bodies on BLM land should occur in accordance with state of Wyoming criteria. Water quality assessments and assessments of water bodies should be done by multi-disciplined teams of Agency employees which should always include range conservationists and where possible private livestock producers.

Air quality issues should also be closely coordinated with the state of Wyoming. Efforts to enhance range conditions by prescribed fires should be utilized as much as possible and the Agency needs to examine it’s prescribed fire protocols to ensure they don’t serve as an impediment to fire use. Smoke emissions from prescribed fires should also be considered in the context of fire prevention. In other words, if prescribed burns will reduce fire hazards, then a prescribed fire for that purpose should receive a second look if there are regional haze considerations. If a prescribed fire is not carried out because of regional haze limitations and later that same area is ignited by a natural event, then haze impacts could be greater than if the burn had been allowed to proceed. Flexibility is needed to provide for effective use of fire for resource protection and enhancement.

In areas where mineral development occurs on split estate lands, we encourage the Agency to ensure proper protections have been required of the mineral developer for the surface estate. Where reduction in surface values occur some mechanism for mitigation should be considered.

We would encourage resource use of the federal lands and encourage the Agency to work to help livestock producers utilize these lands.

Thank you for this opportunity to provide input.

Sincerely,



Ken Hamilton
Administrative Assistant

cc NER in Platte, Goshen, Natrona and Converse
Board

APPENDIX C

COMMENTS RECEIVED POST SCOPING COMMENT PERIOD

The Casper Field Office received the comment letters and forms provided in Appendix C after the scoping period closed on November 20, 2003. While these comment letters and forms are not summarized in this scoping report, they will be considered during alternative formulation. To that effect, the BLM is open to accepting comments any time during the RMP revision process and will work to ensure that these comments are incorporated into the next phase of the Casper RMP revision process.

Casper Field Office RMP Revision Scoping Report
Comments Received Post Scoping Comment Period Index – By Author

Last Name	First Name	Organization	Comment Letter Number	Format
Hackney	Bill	Pathfinder Backcountry Horsemen of America	CSL-0048	Comment form
Parsons	Curtis C.	EOG Resources, Inc.	CSL-0046	Letter
Strand	Mary	Strand Ranch	CSL-0047	Comment form
Svoboda	Larry	United States Environmental Protection Agency	CSL-0049	Letter



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03 NOV 20 PM 2: 01

EOG Resources, Inc.
1540 Belco Drive
Big Piney, WY 83113-0250
P.O. Box 250
Big Piney, WY 83113-0250
(307) 276-3331

November 24, 2003

Linda Slone
Bureau of Land Management, Casper Field Office
2987 Prospector Drive
Casper, Wyoming 82604

RE: Issues of Concern With Respect to the Casper Resource Management Plan,
Scoping Period

Dear Ms. Slone,

EOG Resources, Inc. (EOG) submits the following comments for consideration during the development of the Casper Resource Management Plan (RMP) for the Bureau of Land Management (BLM). These comments identify significant issues that should be incorporated into the RMP/Environmental Impact Analysis (EIS) development in order to ensure document accuracy and adequacy.

Sufficiency of the Management Situation Analysis (MSA) to accurately describe baseline conditions. The MSA is used to provide baseline information for the RMP revision and EIS development. A summary is posted on the Casper BLM web site. EOG is concerned that inaccuracies or incomplete explanations included in the MSA summary could result in an inaccurate or incomplete description of baseline conditions. A summary should contain sufficient text to allow a reader to easily comprehend the information it contains and why that information is relevant to description of the environment. If sufficient information is not included in the text of the MSA summary so that it is clear, such information should be edited from the MSA and included in the EIS with additional explanatory text. Also, the identification of issues and concerns should reflect the content of the overview of the resource area. If they are not consistent, an EIS analysis of that resource area may reflect bias and may lack impartial consideration.

- Section 2.1 Air Quality:
 - The BLM must perform an adequate regional analysis to demonstrate that future impacts resulting from oil and gas development would not significantly impact air quality.
- Section 2.6 Health and Safety:

- Soliciting opinions as to timing limitations to protect resource values is inappropriate. Timing limitations or development of offset requirements should be determined by appropriate technical expert in the particular field of study.
- Section 2.14 Socioeconomic Conditions
 - The MSA does not make clear that statistics that refer to “mining” also include incomes and revenues associated with oil and gas development. This deficiency should be rectified in the socioeconomic discussion in the EIS.
- Section 2.2.3 Cultural Resources and Section 2.20.3 Visual Resources
 - Access restriction associated with the preservation of significant resource values associated with National Historic Trails should not preclude an operator’s right to develop its leases. Mandating an arbitrary offset from designated trails can unreasonably prevent development. Operators are willing to make reasonable efforts to make their production facilities as unobtrusive as possible when located near trails. Recognizing that an identified management opportunity includes securing access to public lands for energy development, the BLM should actively pursue reasonable solutions acceptable to both the public and oil and gas operators.
 - Evaluating the historic setting and landscape for National Historic Trails does not necessarily require a decision that insists upon preservation of visual characteristics identical to those that existed during the times when the trails were actually in use. Inspection of Figure 2 in the MSA summary shows that all of the National Historic Trails cross or parallel major roads or highways and many travel through or adjacent to towns and cities. To insist that oil and gas development remain hidden from viewpoints along these trails is blatantly discriminatory against the industry.

Ability of the Casper Reasonable Foreseeable Development Scenario (RFDS) to accurately predict oil and gas development during the next 20 years. The RFDS is used as the basis for developing the analysis of impacts to oil and gas leaseable minerals during the timeframe of the RMP/EIS. As such, the development of the RFDS must be as realistic as possible. EOG understands that the RFDS is in the process of development at this time and urges the BLM to consider the following comments for RFDS development in order to ensure the integrity of the EIS.

- Operators should be allowed to cooperatively develop the RFDS with the BLM and should be able to review the RFDS after it is developed in order to ensure document accuracy.
- In consideration of the potentially significant controls/restrictions that may be placed on the oil and gas industry by the decisions reached in the RMP/EIS process, EOG urges that the BLM allow sufficient time be allowed to conduct a thorough review of the data supplied to the BLM by management area operators for incorporation into the document analysis.
- The construction of assumptions upon which the RFDS and EIS are developed must be realistic and should accurately reflect actual conditions under which operators develop their leases to the greatest extent possible. To assume, for

example, that there would be no restrictions that would preclude hydrocarbon development is an unrealistic assumption. Timing limitations, vehicle access restrictions, and areas of no, or limited, surface occupancy/development make this assumption untenable. One result of such an assumption could be that the RFDS may present a projected number of wells that is much greater than what would actually be allowed to occur. Correspondingly, the amount of surface disturbance projected by the RFDS would also be much greater than what would actually occur. An overestimate of surface disturbance may, in turn, cause greater, unnecessary concerns by the public about the magnitude and resulting impacts of hydrocarbon development.

- The RFDS and EIS must provide documentation of the assumptions that it uses to estimate surface disturbance. The RFDS will utilize assumptions that describe amount of surface disturbance associated with access roads, well pads, pipelines, power lines, and compressors. The citations for these assumptions must be more specific than to reference “BLM sources,” for example. The source of the data upon which the guidelines are based should be documented and made available to the public.
- Data obtained from oil and gas operators would provide accurate data for use in developing assumptions used in the RFDS/EIS. At a minimum, the figures used to estimate future surface disturbance should be submitted to the operators for verification and concurrence.
- The information presented in the RFDS and EIS should be easily understandable and not open to misinterpretation. For example, a discussion of short and long term disturbance should make it clear that short term disturbance would occur during a limited time after a well is drilled. Drilling, however, may occur throughout the RMP time frame. Components of surface disturbance associated with well development should be clearly labeled. For example, disturbances associated with wells, pipelines, compressors, etc. should be broken out and clearly identified.
- The RFDS should include specific details of current and projected take-away pipeline capacity from the management area. It is probable that oil and gas development in the management area over the time frame of the RMP would require supplementation of the current take-away capacity. In order to estimate the requirements for take-away capacity that would correspond to the expected level of development, the BLM should enter into discussions with management area operators and pipeline companies to project an appropriate scenario of take-away capacity. The need for an increase in trunk line capacity should be related to economic projections and energy needs for the management area and the nation. The BLM should discuss the surface disturbance associated with trunk line installation with management area pipeline companies. It is likely that additional trunk lines would be located along existing pipeline corridors, thereby minimizing the amount of associated surface disturbance.
- The RFDS must include a discussion of well life in the management area and should attempt to relate the number of wells drilled prior to the implementation of the RMP to the number that would be abandoned during the planning period. An estimate of wells that would be abandoned within the time frame of the planning

period should be quantified so that the respective percentages of new and existing wells are made clear in the document.

- If there are well pads in the management area that have been reclaimed but have yet to be inspected and released from bonding requirements by the BLM, they should be excluded from the amount of disturbed lands in the management area. It is the BLM's responsibility to inspect reclaimed locations in a timely manner so that these formerly disturbed areas are not designated as currently disturbed lands.
- The RFDS and EIS should include an estimate of the compression needs required for future production. The documents should include a discussion of the amount of existing compression. Estimates of the number and types/horse power of compressors currently in use and projected for future production needs should be determined through discussions with management area operators and pipeline/gas transmission companies.
- As the national demand for energy sources increases toward as the planning period progresses, production increases are expected to come from, in part, CBNG production. CBNG development is extremely sensitive to gas pricing and demand. The BLM should account for a level of CBNG development within the RMP and EIS that may result from fluctuating market influences and increased market demand.
- EOG is convinced that future gas prices will support continued production throughout the time frame of the RMP. The RFDS and EIS should utilize this assumption in its development scenario.
- The RFDS and EIS should consider possible changes in spacing that may occur during the next 20 years and incorporate such possibilities into its projections. Well spacing is determined by the Wyoming Oil and Gas Conservation Commission and is determined on a formation-specific basis. It is possible that production data may trigger a re-examination of spacing rules for the producing formations in the management area.

Alternatives development. EOG supports the development of alternatives that offer the public, including the oil and gas industry and other users of public lands, clear-cut, distinct resource management choices.

- It is absolutely essential that the RFDS be used to develop alternatives for the EIS that implements the new RMP. A carefully considered, cooperatively developed RFDS will allow the BLM to more accurately assess the extent of oil and gas development in the planning area.
- The EIS should describe a rationale for the development of each alternative considered. Alternatives should not be based on speculative determinations that the mineral resource can be developed regardless of the restrictions imposed upon minerals development. Alternatives should not affect an operator's ability to access the minerals that it has leased. Management area operators have the right to access their leases. An operator's inability to extract minerals from its leases could result from its inability to access the surface above the minerals.
- Potential takings should be limited by the careful development of alternatives that recognize that the methodology used by operators to develop the leased mineral

resources cannot be mandated. An operator's inability to extract minerals from its leases is a denial of the rights associated with lease acquisition and could be construed as a taking. BLM Instruction Memorandum 92-67 clarifies 43 CFR 3101.1-2, which provides for a 200 meter general standard within which surface-use restrictions must fall. For any surface-use restriction that exceeds the 200-meter/60-day rule, the BLM bears the burden of establishing that the restriction is justified.

- The use of alternative drilling technologies should not be presumed to be feasible on anything but a well-specific basis. The use of directional drilling or any other non-conventional type of drilling or production technique cannot be presumed to be able to access minerals in those areas where operations are excluded or restricted. In addition, the use of these techniques would incur extra costs to the operator. Economic considerations may preclude their use.
- The EIS alternatives should include an alternative that allows mineral resource extraction by operators in the district to occur with the employment of reasonable and best management practices. This alternative would include all environmental impact mitigation measures and environmental protection initiatives that operators routinely and voluntarily undertake during their operations. Best management practices are those that are based upon the application of the operators' experience with scientifically proven procedures. This alternative should not prevent operators from accessing the surface above their leases and should not assume that the use of alternative technologies is technically and economically feasible.
- The EIS should not include "staged leasing" in its alternatives. Inclusion of a schedule that mandates when oil and gas development could occur through the time-limited release of leases imposes artificial constraints that could be detrimental to the regional economy. Staged leasing eliminates the supply and demand aspects of a free market economy. If a tract has minerals that can be leased, development of these minerals should occur as market conditions allow.
- The BLM should consider a "common sense" approach to the development of alternatives and the implementation of the RMP. Specifically, the validity of the RMP should not be limited to a predetermined number of wells or level of development. The BLM, composed of professional resource managers, should be able to evaluate the viability of the RMP by examination of the results of the policies put in place by the RMP. If, at any time, it becomes apparent to the professional staff of the BLM that the RMP's policies become obsolete or the resources of the management area are inappropriately managed in consideration of the BLM mandate to consider multiple use under the Federal Land Policy And Management Act of 1976 (FLPMA), it would be time to revise the RMP. To evaluate the usefulness of the RMP by determining whether a pre-determined number of wells has been exceeded is arbitrary and denies the use of professional evaluation by the BLM field office staff, the persons most qualified to determine plan viability.

Impacts to natural resources by oil and gas development. EOG believes that the only way that impacts can be analyzed in the management area is with the use of as much

detailed area-specific information, including the experience of industry, agency, and consultant experience and understanding as can be assembled.

- The EIS should use data from the most recent studies conducted within the project area or from areas similar to that of the management area. Data from studies in areas not similar to the project area should be avoided. For example, in an analysis of impacts resulting from the release of CBNG produced water on the surface, conveyance loss estimates should be based on studies conducted within the management area where soil types, stream channel morphology, and climate are specific to this area. Guidance provided in the BLM National Environmental Policy Handbook H-1790-1 states that “existing environmental analyses should be used in analyzing impacts associated with a proposed action to the extent possible and appropriate. This approach builds on work that has already been done, avoids redundancy, and provides a coherent and logical record of the analytical and decision-making process.”
- The EIS must consider and should include data resulting from studies that demonstrate the beneficial effects of oil and gas development. Some studies that pertain to beneficial effects resulting from oil and gas development are listed below:
 - Easterly, T., A. Wood, and T. Litchfield. Undated. Circa 1992. *Response of pronghorn and mule deer to petroleum development on crucial winter range in the Rattlesnake Hills.* Unpublished Completion Report. Hayden-Wing Associates. 1991.
 - Hayden-Wing Associates. *Review and evaluation of the effects of Triton Oil and Gas Corporation's proposed coalbed methane field development on elk and other big game species.* Unpublished report. Laramie, WY. 1990.
 - Hayden-Wing Associates. *Review and evaluation of the regulation and effects of oil and gas development on mule deer, sage grouse, and raptors on the Big Piney-La Barge winter range.* Unpublished report. Laramie, WY.
 - Johnson, B. K., L. D. Hayden-Wing, and D. C. Lockman. *Responses of elk to development of Exxon's Riley Ridge Gas Field in western Wyoming.* 1990.
 - R. L. Callas, D. B. Koch, and E. R. Loft, Eds. *Proceedings of the 1990 western states and provinces elk workshop, Eureka, CA.* California Department of Fish and Game. Sacramento. 1990.
 - Van Dyke, F. and W. C. Klein. *Response of elk to installation of oil wells.* *Journal of Mammalogy.* 77(4): 1028-1041. 1996.
- The BLM should avoid singling out oil and gas development as the sole source of surface disturbance and habitat destruction. Mining, for example, is also a significant source of surface disturbance.
- The BLM should consider the importance of oil and gas development to the economy of this nation while developing its management principles. While

developing the RMP, the BLM should remember that it operates in accordance with FLPMA, which mandates that the BLM consider multiple uses for the lands it administers. Under FLPMA, the BLM must consider all of the land's inherent natural resources, including its mineral resources. While the purpose of the RMP is to manage all the district's resources in an environmentally responsible manner, it is under no obligation to manage all resources with equal emphasis.

Adaptive environmental management is not a viable management strategy. EOG supports the use of a defined management strategy based upon best currently available information.

- The BLM's use of environmental management strategies that may be reconsidered and changed over the RMP planning period presents a moving target of goals and objectives that operators cannot meet while planning their drilling and production programs. It allows the BLM to develop, alter and develop its management strategies in a never-ending planning cycle.
- The endorsement and use of adaptive environmental management provides an opportunity to focus groups to lobby the BLM to include their politically motivated agendas into RMP guidance. Any group would have the opportunity to assemble sufficient data that seemingly gives credence to its objectives for the sole purpose of advancing its aims. The BLM would be burdened with the responsibility of constantly evaluating such proposals for credibility.
- The introduction of new information or data that fundamentally changes the environmental management strategies decided upon in the RMP may effectively supplant strategies based upon data acquired over a long period of time. An altered management direction based upon new data would not have the benefit and background provided by a strategy based on knowledge with a demonstrated historical background.
- EOG recognizes that the RMP must be written in sufficiently broad terms as to provide a direction for resource management and to provide a framework under which resource development can occur. If, over the time frame of the RMP, professionally accepted, but unanticipated, data becomes available that fundamentally alters the basic premises upon which oil and gas operators plan their future operations, the change in management direction should be implemented only after a review of the impacts that such a change may cause. Such an implementation should occur only after the adoption of a revised RMP and the associated NEPA processes.
- EOG acknowledges that a broadly written RMP would be implemented through a series of additional, subsequent NEPA documents that would address impacts that would result from well development, including well-specific EAs. EOG urges the BLM to consider the analysis of impacts resulting from typical field development using environmental assessments rather than environmental impact statements. Requiring the development of EISs to implement field development adds unnecessary delays and hinders timely extraction of the mineral resource. Large scale energy development should be addressed concurrently with the development of the RMP, which is implemented by an EIS.

Impacts to regional socio-economics. EOG supports the choice of a RMP based on an EIS that considers in its analyses the wide-ranging adverse effects (losses) to the regional economy that would result from hindering oil and gas exploration and development in the project area.

- The description of the affected environment should include a historical perspective of land use in the management area and the how the development of oil and gas resources has facilitated economic growth. This description would provide a context for current conditions and how different future development scenarios would affect the stability of the economy in the project area.
- The economic effects analysis should include beneficial impacts to the revenues generated in association with oil and gas operations in Converse, Natrona, Platte, and Goshen counties in addition to benefits to the State of Wyoming. The assessment of the economic health of the counties more directly impacted by the provisions included in the RMP should be differentiated from the impacts to the economic viability of the state.
- The EIS should analyze impacts to public services that depend upon tax revenues generated by oil and gas operations. The analysis should include quantification of incremental income resulting from the oil and gas industry to services such as public school districts.
- Typical or average well costs should not be used as a baseline to assess the economic viability of drilling and producing a well during the time frame of the RMP. Use of current figures based on current operational procedures for a period of 20 years is speculative at best. There are many factors that affect typical well costs. Each of these factors has the ability to alter well costs to the extent that varying a single figure for any one factor would render an analysis using a static cost invalid. If estimates of future pricing are included in the EIS, sensitivity analyses should be included to demonstrate the effects of changes to the projected price to drilling and production activities and to the economy of the project area.
- The designation of Special Management Areas, areas of limited or no surface use, or areas with seasonal restrictions to development, should be quantified in the EIS in terms of economic impacts to the oil and gas industry.
- The EIS should include provisions describing how the potential for lost revenues to oil and gas operators resulting from short and long term lease access restrictions would be recovered.

Air quality analysis.

- The BLM should recognize in the EIS that emissions associated with oil and gas development are regulated by the Wyoming Department of Environmental Quality and that the BLM defers regulation of emissions to its authority.

Special Management Areas (SMAs)

- SMAs should not be allowed to impair existing lease rights.
- Designation of SMAs should be kept to a minimum in unleased areas. If a SMA is designated in an unleased area, the EIS should quantify the loss of production

in terms of the value of the mineral resource and revenues to the local counties and state.

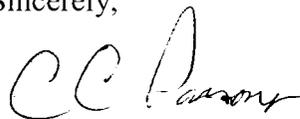
Preparation of Statement of Adverse Energy Impacts. As specified in Executive Order 13212, the BLM should prepare a Statement of Adverse Energy Impacts after the record of decision for the Casper RMP is made if the decision has the potential to adversely impact energy production, development, and transmission. The statement would document the decision in accordance with the order, which was intended to expedite projects that increase production, transmission, or conservation of energy. A Statement of Adverse Energy Impacts should be developed for each alternative and should discuss the following topics:

- The impact of timing restrictions;
- The impact of designated areas excluded from energy development;
- Costs to oil and gas development associated with the mandate of alternative drilling technologies, such as directional drilling; and
- Costs to consumers if energy development is hindered or delayed as supplies fall short of demand.

In summary, the ability to extract natural gas from the leased public lands administered by the Casper BLM Field Office helps to maintain a stable economic platform for the counties directly affected by the RMP, makes an important contribution to the economic health of the State of Wyoming, and helps to satisfy the energy needs of our nation. EOG expects that the RMP will recognize and present analysis highlighting the importance of the role that the oil and gas industry plays in the economy by developing an affected environment description that contains a detailed historic perspective of the role of energy development in the management area and an impacts analysis that fully considers the direct, associated, and cumulative effects of restricting energy development within its purview. EOG believes that the use of assumptions that unrealistically reflect the economics of drilling and production operations would result in a RMP/EIS that is speculative and would not provide a reasonably accurate projection of operator activity during the RFDS's time frame. To develop a RMP that attempts to accurately consider the factors relating to the oil and gas industry, the BLM must actively solicit data from the operators that are active in the project area.

The hydrocarbon resources that exist beneath public lands are, in fact, owned by the public. Oil and gas operators in the management area provide the means to access and develop these oil and gas reserves, providing much needed energy to meet public demand.

Sincerely,



Curtis C. Parsons
Division Operations Manater



Written Comment Form
Casper Field Office Planning Area
Resource Management Plan (RMP) Revision Process



Location: _____

Date: 11/20/03

Thank you for your input.

PLEASE PRINT LEGIBLY.

I enjoyed Casper Resource Management Plan meeting. The program was informative and well presented. We ranchers need to work with, not against, the BLM in protecting our lands and the information obtained thru meetings & seminars is beneficial to both sides.

Being a land owner near Casper creates problems because of the number of people accessing the land. I sympathize with the 4 wheeler & motorcycle owners in not having places to enjoy their hobby, however, they need to respect the land and the ranchers.

Hunting season brings a lot of problems to me because of the location of my ranch and BLM & state lands accessibility. The one parcel that I mentioned to Jim is described and diagrammed on the reverse. Hunting on this land creates a really dangerous situation as well - this is true of the state land located across the road from this parcel.

Please contact me if you have questions or need further input.

*** CONTINUE ON BACK FOR MORE SPACE ***

Public comments submitted for this planning effort, including names and street addresses of respondents, will be available for public review in their entirety after the comment period closes at the Casper Field Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act (FOIA), you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals or officials representing organizations or businesses, will be made available for public inspection in their entirety.

Form with fields: NAME: Mary Strand, ORGANIZATION: Strand Ranch, ADDRESS: 8655 GEARY Dome Rd, CITY/STATE/ZIP: Evansville, WY 82636

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
No, do not include my name and address on the mailing list.

Please hand this form in or MAIL (post-marked by November 20, 2003) to:

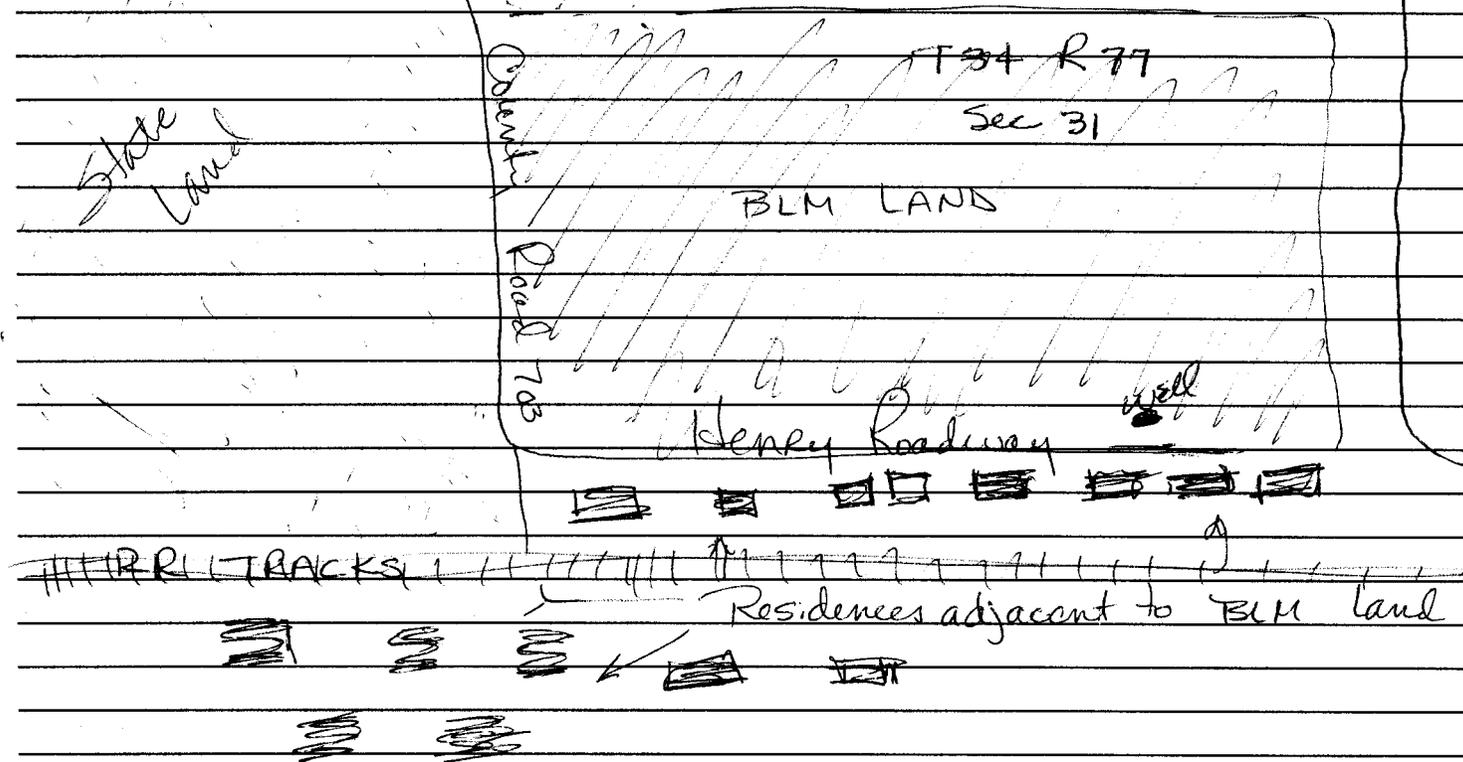
BLM Casper Field Office
2987 Prospector Drive
Casper, Wyoming 82604-2968
Attn: RMP Revision

Appendix C
Page 11 of 17



County Rd #702

Geary Dome Road
County Rd 702



The only access to the land is off County Rd 703 or Henry Roadway (A private Road). Frequently hunters hunt from the north or west (of the BLM) land and the houses lay in the direct line of fire. Also, the only water in that pasture is shown, this means that the wild life must come near the houses to water. During hunting season I remove all livestock from this pasture because of the danger to them.

I feel that serious thought should be given to closing down this 1/2 section of land to hunting, and would like to see the same consideration to the State land indicated west of County Rd 703. The hunting on it occurs mainly from North to South also and the residences along the river are again in the direct line of fire.

Rec'd 11/24/03



Written Comment Form

Casper Field Office Planning Area

Resource Management Plan (RMP) Revision Process



Location: _____

Date: Nov 20, 2003

Thank you for your input.

PLEASE PRINT LEGIBLY.

I WANT TRANSPORTATION ON BLM LAND to specifically INCLUDE Equestrian as a mode of TRANSPORTATION on BLM LANDS.

I ALSO WANT EQUESTRIAN specifically included as a form of RECREATION.

*** CONTINUE ON BACK FOR MORE SPACE ***

Public comments submitted for this planning effort, including names and street addresses of respondents, will be available for public review in their entirety after the comment period closes at the Casper Field Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act (FOIA), you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals or officials representing organizations or businesses, will be made available for public inspection in their entirety.

NAME:	Bill HACKNEY
ORGANIZATION:	PATHfinder BACK COUNTRY HORSEMEN of America
ADDRESS:	6117 Raderville Rte
CITY/STATE/ZIP:	Casper WY 82604-9502

- Yes, include my name and address on the mailing list so I can receive information on the Casper Planning Area RMP Revision.
- No, do not include my name and address on the mailing list.

Please hand this form in or MAIL (post-marked by November 20, 2003) to:

BLM Casper Field Office
2987 Prospector Drive
Casper, Wyoming 82604-2968
Attn: RMP Revision

EVE Bennett
Please call me
at 473-3845



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

999 18TH STREET - SUITE 300

DENVER, CO 80202-2466

Phone 800-227-8917

<http://www.epa.gov/region08>

Ref: 8EPR-N

Linda Slone
Bureau of Land Management
Casper Field Office
2987 Prospector Drive
Casper, Wyoming 82604

RE: Scoping Comments for Platte River
Resource Management Plan and
Environmental Impact Statement

Dear Ms. Slone:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, et. seq., and Section 309 of the Clean Air Act, the Region 8 office of the Environmental Protection Agency (EPA) is submitting scoping comments for the Platte River Resource Management Plan (RMP) and Environmental Impact Statement (EIS).

From reading the scoping notice, it appears that the Casper Field Office has already identified many good issues on which to focus. The following general comment areas are issues that EPA has an interest in and would like to work with BLM prior to the issuing of a draft EIS for this planning process. More importantly, our experiences with other planning projects and related EIS efforts show that working with BLM prior to issuing a draft EIS allows for more time to work on difficult issues prior to time constraints posed by draft EIS comment periods.

Although we are unable to commit as a formal cooperating agency on this action, we are open to assisting in specific areas of important mutual interest. EPA does want to inform BLM up front that our resources of time and travel budget for the NEPA program are meager and already very limited. By either scheduling meetings as conference calls when appropriate or holding meetings in Cheyenne BLM would reduce EPA's time needed for travel to meetings and eliminate the need for hotel rooms for travel to Cheyenne. This may also improve participation by State of Wyoming environmental programs and other agencies such as Fish and Wildlife Services.

General Comments

EPA has identified in past and current BLM projects and Resource Management Plans (RMPs) the importance of good air and water quality analysis for NEPA documents. We continue to encourage Wyoming BLM to accompany good planning with good NEPA analysis



and the avoidance or mitigation of direct and cumulative impacts.

EPA suggests that the Casper Field Office use the recent air quality modeling that has been completed for the Powder River Basin and the ongoing efforts for the Rawlins RMP to evaluate the impacts of air emissions anticipated in the Casper RMP.

Other than mining projects, EPA is not aware of current projects or future projects that would significantly impact surface water or ground water quality. Since a Reasonable Foreseeable Development scenario has not yet been developed for the planning area, EPA will need additional information before we could make informed comments on this issue.

EPA would also encourage the RFD for the planning area to anticipate the potential for development within the planning area. It is entirely appropriate to project past development for coal, oil and gas, and other mining for the life of the RMP. An RFD that only includes current projects or projects that are currently under NEPA analysis is not a reasonable prediction for a planning document such as an RMP. The planning and NEPA analysis must evaluate actions and impacts for the life of the planning document. Although exact locations of wells or mine boundaries may not be possible in an RMP planning process, Wyoming BLM has completed an oil and gas resource assessment for the entire state and this document should be helpful in locating areas of potential development and possibly projecting general levels of activity for mining and oil and gas development.

Scoping Comments Specific to the Casper Resource Management Plan

Air Quality

This RMP should anticipate additional compression needs (if any) for the planning area. Since the gas wells within the RMP are anticipated by the Management Situation Analysis (MSA) to be mostly infill in existing fields with less than 300 hundred coal bed methane wells, BLM should be able to build on the results of the Powder River Basin air quality analysis.

The anticipated plugging and abandonment of existing wells may be greater than the number of new wells drilled. However, it is essential to look at gas production numbers to fully understand if additional compression will be necessary for future increases in production even though the total well count may be less.

Wildlife

The RMP and EIS should include the Wyoming Greater Sage-Grouse as a sensitive species. The MSA briefly mentioned the sage grouse, but did not identify it as a species of concern. The State of Wyoming has recently published a Final Draft Conservation Plan that the RMP should incorporate into planning and especially consider the goals and recommended management practices. Impacts to the sage grouse that could stem from BLM activities include: oil and gas development, dispersed recreation, and vegetation management. BLM should also be coordinating and participating with local conservation groups and the State of Wyoming to assist with research needs.

There is significant potential for habitat improvement in areas where oil and gas fields have played out. This improvement could be achieved through the development and implementation of an aggressive road and pad reclamation program. Since there are so many new access roads being planned for the Buffalo Field Office, EPA suggests looking at habitat improvements that would offset habitat losses in adjacent planning areas.

Grazing

The DEIS should disclose how grazing historically has affected soils, water tables, vegetation, erosion, and streams and riparian areas. We understand the goal of the Taylor Grazing Act and numerous Federal statutes that have followed is to rehabilitate rangelands in the United States. Rehabilitation can be accomplished partly through controlling the numbers of livestock, protecting riparian areas (fencing and off-stream stock watering), rotating animal herds, and so forth. After describing historic rangeland condition, please compare current conditions to past baseline conditions (pre-settlement condition and/or earlier, more degraded conditions) to evaluate how rangeland management practices have affected resources and to prescribe future management options and evaluations.

Oil and Gas

Although it is anticipated that oil production may continue to diminish in the planning area, are there new tertiary recovery projects that may cause additional impacts. Will CO₂ injection require additional compression needs? BLM should also aggressively proceed with exchanging valid existing mineral rights for the Cedar Ridge Traditional Cultural Property (TCP). Leases that have lapsed should not be reissued for Cedar Ridge (TCP).

Wetlands

Executive Order 11990 requires Federal agencies to protect jurisdictional and non-jurisdictional wetlands. The DEIS should describe existing wetlands; their acreage, type, and ecological role; and how both acreage and function will be protected. Road construction and vegetation clearing, livestock grazing, and other disturbances may result in hydrologic impacts. These activities can promote changes to surface and subsurface drainage patterns that can ultimately lead to changes in wetland integrity and function. To comply with the CWA 404(b)(1) Guidelines, a thorough analysis of all possible alternatives to avoid and minimize wetland and aquatic resource habitat impacts should be addressed through the NEPA process.

The goals for establishing proper functioning condition (PFC) for wetlands should be identified in the the RMP and EIS. Currently 50% of the wetlands within the planning area meet the PFC description and 15% are non functional. As stated in the MSA, wetlands in the planning area are not large in quantity but are critical to habitat for many species. Wetlands also provide other amenities such as water quality improvement and flood control. Therefore, EPA encourages BLM to provide alternatives that will avoid impacts to wetland areas and significantly improve the condition of the wetlands in the planning area.

Thank you for the opportunity to participate in this planning process. Gregory Oberley is

the NEPA program contact and can be reached at (303)-312-7043. Joe Delwiche is the Air Program contact for NEPA documents and he can be reached at (303)-312-6448.

Sincerely,

Larry Svoboda, Director
NEPA Program
Office of Ecosystems Protection and Remediation

cc: Bill Daniels BLM Cheyenne

APPENDIX D

FEDERAL REGISTER NOTICE OF INTENT



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Notice of Intent To Revise the Platte River Resource Management Plan and Prepare an Associated Environmental Impact Statement

[Federal Register: June 20, 2003 (Volume 68, Number 119)]
[Notices]
[Page 37020-37022]
From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr20jn03-115]

DEPARTMENT OF THE INTERIOR
Bureau of Land Management
[WY-060-03-1610-DO]

Notice of Intent To Revise the Platte River Resource Management Plan and Prepare an Associated Environmental Impact Statement

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Intent to revise the Platte River Resource Management Plan (RMP), to be titled and referred to in the future as the Casper RMP, and prepare an associated Environmental Impact Statement (EIS); solicitation of public comments on resource issues and preliminary planning criteria; and call for coal and other resource information for the Casper RMP planning area, Wyoming.

SUMMARY: This document (1) provides notice that the Bureau of Land Management (BLM) intends to prepare a revised RMP with an associated EIS, (2) solicits public comments regarding resource issues and preliminary planning criteria, and, (3) solicits resource information for coal and other resources for the Casper planning area. The planning area, encompassing approximately 1.4 million acres of BLM-administered public land surface and 4.7 million acres of BLM-administered Federal mineral estate, is located in Converse, Goshen, Natrona, and Platte counties, Wyoming. The Platte River RMP (1985) will continue to guide management actions and decisions for the planning area until the Casper RMP is completed and approved.

Preparation of the Casper RMP and associated EIS will fulfill the obligations set forth by the Federal Land Policy and Management Act (FLPMA), the National Environmental Policy Act (NEPA), and Federal regulations.

DATES: This notice initiates the public scoping process. The BLM can best utilize public comments and resource information submissions

submitted within 60 days of publication of this notice.

ADDRESSES: Please send written comments and resource information submissions via mail to the BLM, Casper Field Office, 2987 Prospector Drive, Casper, Wyoming 82604; or electronically to crmp_wymail@blm.gov. Members of the public may examine documents pertinent to this proposal in the Casper Field Office. To be considered, all comments must include legible full name and address on the envelope, letter, postcard, facsimile, or e-mail. Comments, including names and street addresses of respondents, will be available for public review at the Casper Field Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday, except holidays, and may be published as part of the EIS process. Individual respondents may request confidentiality. If you wish to withhold your name or street address from public review or from disclosure under the Freedom of Information Act, please state this prominently at the beginning of your written comment. The BLM will honor such requests to the extent allowed by law. All submissions from organizations and businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

FOR FURTHER INFORMATION: For further information or to have your name added to the Casper RMP mailing list, contact Linda Slone at the above address or by telephone at (307) 261-7600, or electronically to rmp_wymail@blm.gov.

SUPPLEMENTARY INFORMATION: The BLM will work collaboratively with interested parties to identify the management decisions that are best suited to local, regional, and national interests. The public scoping process will help identify planning issues, provide for public comment on the proposed planning criteria, and provide an opportunity to comment on documents published throughout the RMP revision process.

The Cedar Ridge-Badwater Creek area, located along the southern border of the Big Horn Mountains in Natrona County, has been evaluated as a traditional cultural property (TCP). The TCP is a sensitive cultural resource of high significance eligible for inclusion in the National Register of Historic Places. During the Casper RMP planning process, the Cedar Ridge-Badwater Creek area will be evaluated as a Special Management Area (SMA.)

1. Preliminary Issues

Emerging resource issues and changing laws necessitate preparation of the Casper RMP. Preliminary issues and management concerns have been identified by BLM personnel, other

[[Page 37021]]

agencies, and in meetings with individuals and user groups. These issues represent the BLM's knowledge to date on the existing issues and concerns with current management. The major issue themes that may be addressed in the planning effort include:

- A. Energy and mineral resource exploration and development;
- B. Access to and transportation on BLM lands;
- C. Recreation and off-highway vehicle (OHV) management;
- D. Wildlife habitat and management of crucial habitat and migration corridors;
- E. Management and the cumulative effect of land uses and human activities on threatened, endangered, candidate, and sensitive species

and their habitats;

F. Vegetation, including impacts of invasive non-native species;

G. Management of cultural and paleontological resources, including national historic trails;

H. Landownership adjustments;

I. Fire management;

J. Livestock grazing;

K. Visual resource management; and

L. Air and water quality.

These preliminary issues are not final and may be added to and refined throughout the public participation process. The BLM is requesting the help of the public in identifying additional issues to be addressed in the planning effort. Decisions in the RMP will adhere to the goals and objectives of the President's National Energy Policy.

2. Categorization of Issues

After gathering public comments on what issues the Casper RMP should address, the BLM will place suggested issues in one of three categories: issues to be resolved in the RMP, issues resolved through policy or administrative action, and issues beyond the scope of the RMP.

Rationale will be provided in the EIS for the Casper RMP for issues to be resolved through policy or administrative action and issues beyond the scope of the EIS. In addition to major issues, a number of management concerns will be addressed in the RMP. The public is encouraged to help identify these concerns throughout the public scoping process.

3. Preliminary Planning Criteria

The BLM identified the following preliminary planning criteria to guide resolution of the issues considered in the planning effort. The BLM may revise these criteria during the planning process or in response to public comment.

A. The revised RMP will recognize valid existing rights.

B. The revised RMP will comply with all applicable laws, regulations, policy, and guidance.

C. Planning decisions will cover BLM-administered public lands, including split-estate lands where the subsurface minerals are severed from the surface right, and the BLM has legal jurisdiction over one or the other.

D. The RMP planning effort will be collaborative and multi-jurisdictional in nature. The BLM will strive to ensure that its management decisions are complimentary to other planning jurisdictions and adjoining properties, within the boundaries described by law and regulation.

E. The environmental analysis will consider a reasonable range of alternatives that focus on the relative values of resources and respond to the issues. Management prescriptions will reflect the principles of multiple use and sustained yield.

F. The BLM will use current scientific information, research, new technologies, and the results of resource assessments, monitoring, and coordination to determine appropriate local and regional management strategies that will enhance or restore impaired ecosystems.

G. The Wyoming Standards for Healthy Rangelands will apply to all activities and uses.

H. The BLM will address socioeconomic conditions and environmental justice.

I. The BLM will provide for public safety and welfare relative to

fire, hazardous materials, and abandoned mine lands.

J. Visual Resource Management (VRM) class designations will be analyzed and modified to reflect present conditions and future needs.

K. The BLM will consider present and potential uses of the public lands through the development of reasonably foreseeable future development and activity scenarios based on historical, existing, and projected levels of use.

L. Planning decisions will include the preservation, conservation, and enhancement of cultural, historical, paleontological, and natural components of public land resources, while considering energy development and other surface-disturbing activities.

M. The BLM will coordinate with Native American tribes to identify sites, areas, and objects important to their cultural and religious heritage.

N. Planning decisions will comply with the Endangered Species Act and the BLM interagency agreements with the U.S. Fish & Wildlife Service regarding consultation.

O. Areas potentially suitable for ACECs or other special management designations will be identified, and where appropriate, brought forward for analysis in the EIS.

P. Waterway segments have been classified and determinations of eligibility and suitability made in accordance with Section 5(d) of the Wild and Scenic Rivers Act. Appropriate management prescriptions for maintaining or enhancing the outstanding remarkable values and classifications of waterway segments meeting suitability factors will be part of the RMP revision.

Q. OHV management decisions in the revised RMP will be consistent with the BLM's National OHV Strategy.

R. Decisions in the revised RMP will adhere to the goals and objectives of the National Energy Policy as well as the Energy Policy and Conservation Act.

S. Known areas in the Casper planning area with coal development potential are located in northeastern Converse County. Coal screening determinations were made on these areas during planning efforts for the Buffalo RMP and the Thunder Basin National Grasslands Land and Resource Management Plan. No additional coal screening determinations or coal planning decisions are planned for the Casper RMP, unless public submissions of coal resource information or surface resource issues indicate a need to update these determinations.

4. Call for Coal and Other Resource Information

Parties interested in leasing and development of Federal coal in the planning area should provide coal resource data for their area(s) of interest. Specifically, information is requested on the location, quality, and quantity of Federal coal with development potential, and on surface resource values related to the 20 coal unsuitability criteria described in 43 CFR part 3461. This information will be used for any necessary updating of coal screening determination (43 CFR 3420.1-4) in the area and in the environmental analysis for the Casper RMP.

In addition to coal resource data, the BLM seeks resource information and data for other public land values (e.g., air quality, cultural and historic resources, fire/fuels, fisheries, forestry, lands and realty, non-energy minerals and geology, oil and gas (including coalbed methane), paleontology, rangeland management, recreation, soil, water, and wildlife) in the planning area. The purpose of this request is to assure that the planning effort has

[[Page 37022]]

sufficient information and data to consider a reasonable range of resource uses, management options, and alternatives for the public lands.

Proprietary data marked as confidential may be submitted in response to this call for coal and other resource information. Please submit all proprietary information submissions to the Casper Field Manager at the address listed above. The BLM will treat submissions marked as 'Confidential' in accordance with the laws and regulations governing the confidentiality of such information.

5. Public Participation

The BLM will announce public meetings and comment periods through one or more of the following: local news media, newsletters, and the Casper Field Office Web site, <http://www.wy.blm.gov/cfo/info.htm>, **EXIT disclaimer** at least 15 days prior to the event. Meetings will tentatively be held in the fall of 2003 in Casper, Douglas, Torrington, and Wheatland, Wyoming. The minutes and list of attendees for each meeting will be available to the public and open for 30 days so that attendees may clarify the views they expressed. The BLM will also provide additional opportunities for public participation throughout the RMP revision process.

Dated: May 2, 2003.

Robert A. Bennett,
State Director.

[FR Doc. 03-15602 Filed 6-19-03; 8:45 am]
BILLING CODE 4310-22-P

APPENDIX E
SCOPING NOTICE



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Casper Field Office
2987 Prospector Drive
Casper, Wyoming 82604-2968

1610/Casper RMP

October 20, 2003

RE: Invitation to Participate in the Preparation of the Casper Resource Management Plan

Dear Interested Party:

The Casper Field Office, Wyoming Bureau of Land Management, is currently revising the Platte River Resource Area Resource Management Plan (RMP). As part of this project, a supporting environmental impact statement (EIS) is also being prepared.

The revised RMP, referred to as the Casper RMP, is being developed to provide future direction for managing approximately 1.4 million acres of public land and 4.7 million acres of federal mineral estate lands in east central Wyoming. The planning area includes most of Natrona County and all of Converse, Goshen, and Platte Counties, Wyoming. The BLM's Lander Field Office administers public land in the southwestern corner of Natrona County.

An integral part of developing the Casper RMP is public involvement. The Casper Field Office has scheduled four public scoping meetings at the times and locations shown below.

Meeting Site	Date	Facility	Time
Wheatland	November 10, 2003	Platte County Library Large Meeting Room 904 9th St. Wheatland, WY	3 p.m. to 8 p.m.
Torrington	November 11, 2003	Eastern Wyoming College CTC Building 3200 W. C St. Torrington, WY	3 p.m. to 8 p.m.
Douglas	November 12, 2003	Converse County Community Room 107 N. 5 th St. Douglas, WY	3 p.m. to 8 p.m.
Casper	November 13, 2003	BLM Casper Field Office 2987 Prospector Drive Casper, Wyoming	3 p.m. to 8 p.m.

These meetings were scheduled to provide an opportunity for you to comment on development of the Casper RMP and EIS. Along with presentations at 3:30 p.m. and 6:00 p.m. and question and answer sessions, you will have an opportunity to visit one on one with BLM resource specialists about any questions, comments, or concerns you may have.

A website has been developed for the Casper RMP located at www.blm.gov/rmp/casper. This website provides information and background on the RMP and EIS process as well as information on how you can participate in the planning process. The BLM has also prepared a Summary of the Management Situation Analysis. This summary provides information about existing resource conditions, current management practices, and issues and concerns identified to date. The summary, along with comments received during scoping, will be used to formulate alternatives and develop the draft EIS. The summary will be available for public review at this website beginning November 3, 2003.

Preliminary planning issues and criteria have been identified and will also be used to guide the identification and development of management alternatives. These preliminary issues and criteria are not final. They may be added to or refined during the public scoping process. The BLM is requesting your help in identifying additional issues and concerns, management alternatives, or other ideas to be addressed in the planning effort. For your convenience in commenting, a copy of the preliminary planning issues and criteria are enclosed along with a map of the planning area.

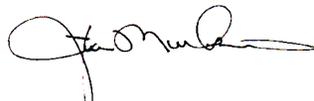
Throughout preparation of the Casper RMP and EIS, local interests and residents will have additional opportunities to participate and share their insights and comments. However, to ensure sufficient time to consider your comments in alternative formulation and preparation of the draft EIS, comments should be postmarked by November 20, 2003.

Written comments received during the public scoping process may be published as part of the environmental analysis process. After the close of the public scoping period, all comment letters received, including names and addresses of respondents, will be available for public review at the BLM Casper Field Office during regular business hours (7:45 am to 4:30 pm), Monday through Friday (except federal holidays). Individual respondents may request confidentiality. If you wish to withhold your name and address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your written comment. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals representing organizations or businesses, will be made available for public inspection in their entirety.

Comments on the preparation of the Casper RMP and EIS can be mailed to: Casper Field Office, BLM, 2987 Prospector Drive, Casper, WY 82604, or submitted electronically (beginning November 3rd) on the Casper RMP website at www.blm.gov/rmp/casper. Comment forms will also be available at the scoping meetings. In order to decrease the cost of entering written comments into our tracking database, we strongly encourage you to submit your comments electronically at our website.

We look forward to working with you in development of the Casper RMP. If you have any questions or need additional information, please contact Linda Slone, Planning and Environmental Coordinator, at the address shown above or at (307) 261-7600.

Sincerely,



Jim Murkin
Field Manager, Casper

Enclosures: Preliminary Planning Issues and Criteria
Planning Area Map

**CASPER RMP
PRELIMINARY PLANNING ISSUES AND CRITERIA**

Preliminary Planning Issues

- A. Energy and mineral resource exploration and development;
- B. Access to and transportation on BLM lands;
- C. Recreation and Off-Highway Vehicle management;
- D. Wildlife habitat and management of crucial habitat and migration corridors;
- E. Management and cumulative effect of land uses and human activities on Threatened, Endangered, Candidate, and Sensitive species and their habitats;
- F. Vegetation, including impacts of invasive non-native species;
- G. Management of cultural and paleontological resources, including National Historic Trails;
- H. Land ownership adjustments;
- I. Fire management;
- J. Livestock grazing;
- K. Visual Resource Management; and,
- L. Air and water quality.

Preliminary Planning Criteria

- A. The revised RMP will recognize the existence of valid existing rights.
- B. The decisions in the revised RMP will cover BLM-administered public lands, including split-estate lands where the subsurface minerals are severed from the surface right, and the BLM has legal jurisdiction over one or the other.
- C. The BLM will use a collaborative and multi-jurisdictional approach to determine the desired future condition of public lands.
- D. The BLM will strive to ensure that its management decisions are complimentary to other planning jurisdictions and adjoining properties, within the boundaries described by law and regulation.
- E. The environmental analysis will consider a reasonable range of alternatives that focus on the relative values of resources and respond to the issues. Management prescriptions will reflect multiple use resource principles.
- F. The BLM will use current scientific information, research, new technologies, and the results of resource assessments, monitoring, and coordination to determine appropriate local and regional management strategies that will enhance or restore impaired ecosystems.
- G. Revised RMP decisions will comply with all applicable laws, regulations, policy, and guidance.

IN REPLY REFER TO:
1610/Casper RMP

date

CERTIFIED MAIL

Dear:

The Casper Field Office of the Bureau of Land Management (BLM) is beginning a revision of its land use plan, the Casper Resource Management Plan (RMP). The management plan serves as BLM's general direction for all resource and land use decisions for the BLM-administered public lands and resources in the Casper Field Office planning area. This will include guiding the use, protection, and management of natural and cultural resources on the public lands in much of Natrona, Converse, Platte and Goshen counties in Wyoming (see enclosed map). Developing the RMP will require the preparation of an Environmental Impact Statement (EIS). The BLM will work cooperatively with state, local, and tribal governments in developing the RMP and the EIS. We would like to begin consultations with you, and invite you to participate in the planning process, in accordance with the National Environmental Policy Act, the Federal Land Policy and Management Act, the National Historic Preservation Act, the American Indian Religious Freedom Act, and Executive Order 13007 on Indian Sacred Sites.

The Casper Field Office planning area contains a large number of archeological sites representing occupation of the area for at least the last 10,000 years. We have numerous sites with stone alignments and cairns, as well as many camp sites and tool manufacturing areas. The only formally recognized sacred site that we know of is Cedar Ridge, on Badwater Creek near Waltman, Wyoming. No other sacred sites, ceremonial sites or other traditional use areas have been identified at present. The planning area contains other significant cultural resources that have yet to be discovered.

We are contacting tribes who have oral traditions or have previously expressed cultural concerns relating to the planning area, or who are documented to have occupied or used the area during historic times. We request your comments on any issues or concerns regarding the management of this planning area. We would appreciate any historical information on the use and significance of the planning area, such as places of traditional, religious, or cultural importance that your tribe wishes the BLM to consider in determining tribal needs for use, access, or other special management. Any information you provide will be used in a respectful manner, and anything you would like to share with BLM but would prefer not be made public will be kept confidential.

The Cedar Ridge site represents our major success in the consultation effort. An open exchange among tribal council representatives, representatives of the elders, BLM officials and cultural resource staff has resulted in recognizing this highly important site as a Traditional Cultural Property with great significance for the Eastern Shoshone. The result is additional protection for an area traditionally used for ceremonial purposes, and a well-defined zone in which future land uses will be approved only after very careful consideration of the effects to Cedar Ridge. Without consultation, we would have had an enormous archaeological site, valuable for scientific purposes, but might have lost the equally, if not more, important values as a ceremonial site. Normal cultural resource procedures would have captured the scientific information, but irreparable harm would have come to the intangible traditional values.

The Casper Field Office requests a consultation with your tribe at a time and location convenient for you. We would like to discuss the Casper RMP revision and why your involvement is vital to the success of this revision. We would also like to receive any information or concerns you may have about the RMP revision. We would be pleased to offer tours of the planning area, including significant archeological sites or other areas of interest.

In addition, we will be conducting a formal public involvement process during the next six months, including public scoping meetings in October and November of 2003. We would be very pleased if you participate in this process. We will send you invitations to participate in this process, including specific meeting dates and locations.

If possible, we request that you identify traditional leaders or elders who you determine should be contacted in addition to yourself, to express their interests or concerns regarding the Casper RMP. We look forward to working with you and your tribal members or authorized representatives who have considerable knowledge of tribal history and concerns.

While your input and involvement are welcomed throughout the planning process, there are certain points in the process where your participation is very important. Initially, we are requesting data, input, and identification of issues during the formal scoping period. Your input will also be important during the early stage of developing the alternatives for the draft Environmental Impact Statement (EIS). Later, during the 90-day public review and comment period for the draft EIS, your input will help us prepare the final EIS and the Record of Decision for the Casper RMP.

We will devote careful consideration to all of your comments as we make decisions about the future management of the BLM-administered public lands and resources. We will keep you informed of the status of the planning effort throughout the process. We look forward to working cooperatively to address your tribe's concerns in a thoughtful and respectful manner.

The enclosed Return Form is provided for your convenience in responding to this letter, should you wish to reply in that manner.

If you would like further information or want to request a meeting, please contact Linda Slone, project manager, at (307) 261-7520. With regard to cultural heritage issues, please contact Christopher Arthur, the cultural resource specialist on the planning team, at (307) 261-7501 or email Chris_Arthur@blm.gov. We will contact you soon by telephone to discuss your tribe's concerns and issues. Thank you for your time and consideration, and we look forward to hearing from you.

Sincerely,

Jim Murkin
Field Manager

Enclosures:
Map of planning area
Return Form

cc: Linda Slone (CFO)

CONSULTATION RETURN FORM

Dear Tribal Official:

This form is provided for your convenience to assist BLM in ensuring that your tribe has received our correspondence, and that we can continue to communicate with you in the most effective way possible. If you are not the appropriate individual to receive and respond to this form, please see that this correspondence and information, along with this form and return envelope, are given to the appropriate person.

Please fill out this form and return it in the supplied self-addressed, stamped envelope. Be assured that we will follow up with you and/or your other tribal representatives in accordance with your responses. Please check each of the following boxes that you wish to pursue:

Our tribe has information or concerns that we would like to discuss with the BLM about the Casper Resource Management Plan. Therefore, we would like you to contact us to set up a meeting where we can consult on the issues.

Our tribe would like to come to the Casper Field Office area to tour selected sites and other areas that we feel may be of interest due to their potential traditional, religious, or cultural concerns.

The information that you have provided in your correspondence is sufficient and we do not require consultation with you at this time. We do, however, request copies of the draft and final Environmental Impact Statements and associated documents generated during the development of the Casper Resource Management Plan.

Thank you for your correspondence. Our tribe has no comment and no further interest in the Casper Resource Management Plan at this time.

Name of individual responding to this form:

(Please print)

Title: _____

(Please print)

Telephone No. _____

Date: _____

Signature: _____

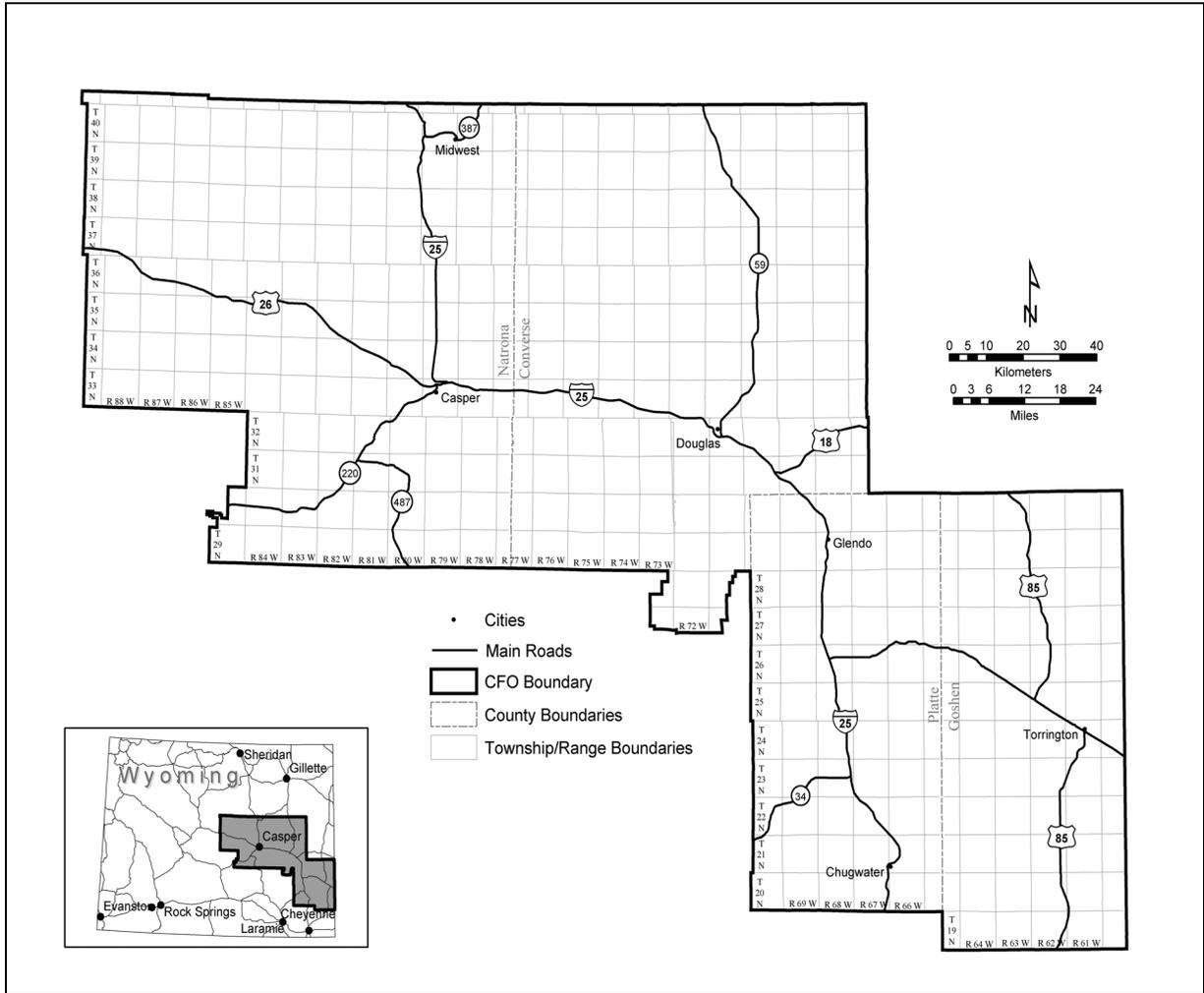
If there is someone else we should contact regarding this correspondence, please indicate their name, title, address, and telephone number below:

Name: _____ Title: _____

Address: _____

Telephone No. _____

Casper Field Office Planning Area



APPENDIX F

PRESS RELEASE AND PUBLIC SERVICE ANNOUNCEMENTS

**BLM Casper Field Office
Media Tracking Form**

Type of Media	Name of Media Source	Date Published or Broadcasted
Newspaper Ad or Press Releases		
Newspaper Article	Casper Star Tribune	7/4/2003
Newspaper Article	Casper Star Tribune	7/6/2003
Newspaper Article	Casper Star Tribune	10/30/2003
Newspaper Article	Casper Star Tribune	11/5/2003
Newspaper Article	Glenrock Independent	7/26/2003
Newspaper Article	Guernsey Gazette	7/24/2003
Newspaper Article	Lingle Guide	7/8/2003
Newspaper Article	Platte County Record Times	
Newspaper Article	Torrington Telegram	7/2/2003
Newspaper Article	Torrington Telegram	11/5/2003
Newspaper Article	Wyoming Business Reprot	9/1/2003
Newspaper Article	Wyoming Livestock Roundup	7/28/2003
Newspaper Article	Wyoming Livestock Roundup	8/4/2003
Newspaper Article	Wyoming Livestock Roundup	8/18/2003
Newspaper Article	Wyoming Livestock Roundup	11/3/2003
Interview with Don Whyde	Torrington Telegram	11/11/2003
Interview with Jim Murkin	Casper Star Tribune	7/1/2003
Interview with Linda Slone	Rocky Mountain Energy Reporter	11/5/2003
BLM Bulletins		
BLM Seeks Input On Platte River RMP		6/20/2003
Casper BLM holds RMP Scoping Meetings		10/27/2003
Casper BLM holds RMP Scoping Meetings Reminder		11/11/2003
TV Spot		
TV Interview with Don Whyde	KWYF-TV	11/13/2003

Number: 03-27
Date: 6/20/2003



WYOMING BLM NEWS



Bureau of Land Management Casper Field Office 2987 Prospector Drive Casper, WY 82604

Contact: Lesley A. Collins, 307/261-7603

BLM SEEKS INPUT ON PLATTE RIVER RMP

The Bureau of Land Management (BLM), Casper Field Office, is asking the public to provide resource information, issues, and concerns as the agency begins the process of revising the Platte River Resource Management Plan (RMP). As part of this project, a supporting environmental impact statement is also being prepared.

The Platte River RMP was approved in July 1985, and several updates have occurred since that time. Current RMP decisions are on the Casper Field Office web site, <http://www.wy.blm.gov/cfo/cfoplan.htm>.

The revised RMP referred to as the Casper RMP, is being developed to provide future direction for managing approximately 1.4 million acres of public surface land and 4.7 million acres of federal mineral estate lands in east central Wyoming. The planning area includes most of Natrona County, and all of Converse, Goshen, and Platte Counties, Wyoming. BLM's Lander Field Office administers public land in the southwestern corner of Natrona County.

An integral component of the Casper RMP development process is public involvement. This request for public input is the first opportunity for local interests and residents to participate and share their insights and comments. As BLM proceeds with the planning effort, additional opportunities for public participation will be provided.

Emerging issues and changing laws necessitate preparation of the Casper RMP. The major issues are 1) energy and mineral resource exploration and development, including consistency with the National Energy policy; 2) access to and transportation on BLM lands; 3) recreation and off-highway vehicle (OHV) management; 4) wildlife habitat and management of crucial habitat and migration corridors; 5) management and the cumulative effect of land uses and human activities on threatened, endangered, candidate, and sensitive species and their habitats; 6) vegetation, including impacts of invasive non-native species; 7) management of cultural and paleontological resources, including national historic trails; 8) landownership adjustments; 9) fire management and consistency with the National Fire Plan; 10) livestock grazing; 11) visual resource management; and 12) air and water quality. The BLM is requesting the help of the public in identifying additional issues to be addressed in the planning effort.

To assure that the best available information is used in completing the Casper RMP revision, BLM is requesting public input of any available resource information or data relevant to this planning area. BLM is also requesting interest and information on coal resource development potential and other resources that may be affected by coal development for lands in the planning area. Industry, state, local governments, and the public may submit information on lands that should or should not be considered for coal leasing, including statements describing why the lands should or should not be considered for leasing. This request is in accordance with 43 CFR 3420.1-2, fulfilling the required call for coal and other resource information.

BLM can best use public comments and data submissions received by August 20, 2003, or 60 days from the date of publication of the *Federal Register* Notice of Intent to revise the Platte River RMP and prepare an associated EIS. Other opportunities to provide public input, including public scoping meetings, will be announced by BLM through mailings, e-mail postings, and other media during the scoping process.

Written comments and resource information submitted by mail should be sent to the BLM Casper Field Office, Attention Linda Slone, RMP Project Manager, 2987 Prospector Drive, Casper, Wyoming 82604. Electronic comments may be sent to crmp_wymail@blm.gov. For more information or to have your name added to the RMP mailing list, contact Linda Slone at (307) 261-7600.

-BLM-

Number: 04-03
Date: 10/27/2003



WYOMING BLM NEWS



Bureau of Land Management Casper Field Office 2987 Prospector Drive Casper, WY 82604

Contact: Lesley A. Collins, 307/261-7603

Casper BLM holds RMP scoping meetings

The Bureau of Land Management (BLM), Casper Field Office, is asking the public to provide resource information, issues, and concerns as the agency begins the process of revising the Platte River Resource Management Plan (RMP), with an associated environmental impact statement (EIS).

BLM will host four scoping meetings to receive input.

Meetings will be held in:

Wheatland	November 10, 2003	Platte County Library Large Meeting Room 904 9th St. Wheatland, WY	3 p.m. to 8 p.m.
Torrington	November 11, 2003	Eastern Wyoming College CTC Building 3200 W. C St. Torrington, WY	3 p.m. to 8 p.m.
Douglas	November 12, 2003	Converse County Community Room 107 N. 5 th St. Douglas, WY	3 p.m. to 8 p.m.
Casper	November 13, 2003	BLM Casper Field Office 2987 Prospector Drive Casper, Wyoming	3 p.m. to 8 p.m.

The revised RMP, to be referred to as the Casper RMP, is being developed to provide future direction for managing approximately 1.4 million acres of public land and 4.7 million acres of federal mineral estate lands in east central Wyoming. The planning area includes most of Natrona County, and all of Converse, Goshen, and Platte counties. BLM's Lander Field Office administers public land in the southwestern corner of Natrona County.

A Casper RMP website has been developed at www.blm.gov/rmp/casper. This website is a good source of information for participating in this planning process. The website features the latest information on development of the RMP and EIS, including background documents, maps, meeting announcements, published bulletins and other documents.

BLM strongly encourages public comment. Written comments and resource information can be submitted by mail to: BLM Casper Field Office, Attention Linda Slone, RMP Project Manager, 2987 Prospector Drive, Casper, Wyoming 82604. Electronic comments can be submitted online at www.blm.gov/rmp/casper.

For more information or to have your name added to the RMP mailing list, contact Linda Slone at 307/261-7600.

-BLM-

APPENDIX G

WEBSITE COMMENT SCREEN



Submit Your Comments: Step 1

Public comments submitted for this planning effort, including names and street addresses of respondents, will be available for public review in their entirety after the comment period closes at the Casper Field Office during regular business hours (7:45 a.m. to 4:30 p.m.), Monday through Friday, except federal holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under FOIA, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals or officials representing organizations or business, will be made available for public inspection in their entirety.

If you'd like to submit your comments via US Mail, [download this comment form \(104KB PDF\)](#), fill it out and return it to the address printed on the form.

Please provide the following contact information. Red indicates required fields.

Name:	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Last	First	MI
Agency Organization:	<input type="text"/>		
Street Address 1:	<input type="text"/>		
Street Address 2:	<input type="text"/>		
City:	<input type="text"/>		
State:	Choose One <input type="button" value="v"/>		
Zip Code:	<input type="text"/>		
Email:	<input type="text"/>		
<p>Do you wish to withhold the above information from public review or from disclosure under the Freedom of Information Act? <input type="radio"/> Yes <input type="radio"/> No</p> <p>All requests will be honored to the extent allowed by law.</p>			
Do you want to join our mailing list?	<input type="radio"/> Yes <input type="radio"/> No		
Select the category/categories you'd like to comment on:	<input type="checkbox"/> Air Quality (View description) <input type="checkbox"/> Alternatives (View description) <input type="checkbox"/> Content and Methodology (View description) <input type="checkbox"/> Cultural Resources (View description) <input type="checkbox"/> Cumulative Impacts (View description) <input type="checkbox"/> Fire Management (View description) <input type="checkbox"/> Fisheries (View description)		

- [Geology and Geologic Hazards \(View description\)](#)
- [Lands and Realty \(View description\)](#)
- [Livestock Grazing \(View description\)](#)
- [Mineral Resources \(View description\)](#)
- [Mitigation Measures \(View description\)](#)
- [National Historic Trails \(View description\)](#)
- [Off-Highway Vehicles \(View description\)](#)
- [Other Comments \(View description\)](#)
- [Paleontology Resource \(View description\)](#)
- [Purpose and Need \(View description\)](#)
- [Recreation \(View description\)](#)
- [Renewable Energy \(View description\)](#)
- [RMP Revision Process \(View description\)](#)
- [Social and Economic Conditions \(View description\)](#)
- [Soil Resources \(View description\)](#)
- [Special Designations \(View description\)](#)
- [Special Status Species \(View description\)](#)
- [Transportation and Access \(View description\)](#)
- [Utility and Communication Corridors \(View description\)](#)
- [Vegetative Resources \(View description\)](#)
- [Visual Resources \(View description\)](#)
- [Water Resources \(View description\)](#)
- [Wildlife \(View description\)](#)

Proceed

Casper RMP, BLM Project Manager, Linda Slone 2987 Prospector Drive, Casper, WY 82604-2968, (307) 261-7520



APPENDIX H

SCOPING MEETING SIGN-IN FORM



Casper RMP Revision Public Scoping Meeting



Meeting Location _____

Meeting Date _____

First Name _____

MI _____ Last Name _____

Organization _____

Phone _____

Email Address _____

Mailing Address _____

City _____

State _____

Zip Code _____

How did you hear about this meeting?
Newspaper Radio

Scoping Letter Other

Yes! Please add me to your mailing list.



Casper RMP Revision Public Scoping Meeting



Meeting Location _____

Meeting Date _____

First Name _____

MI _____ Last Name _____

Organization _____

Phone _____

Email Address _____

Mailing Address _____

City _____

State _____

Zip Code _____

How did you hear about this meeting?
Newspaper Radio

Scoping Letter Other

Yes! Please add me to your mailing list.



Casper RMP Revision Public Scoping Meeting



Meeting Location _____

Meeting Date _____

First Name _____

MI _____ Last Name _____

Organization _____

Phone _____

Email Address _____

Mailing Address _____

City _____

State _____

Zip Code _____

How did you hear about this meeting?
Newspaper Radio

Scoping Letter Other

Yes! Please add me to your mailing list.



Casper RMP Revision Public Scoping Meeting



Meeting Location _____

Meeting Date _____

First Name _____

MI _____ Last Name _____

Organization _____

Phone _____

Email Address _____

Mailing Address _____

City _____

State _____

Zip Code _____

How did you hear about this meeting?
Newspaper Radio

Scoping Letter Other

Yes! Please add me to your mailing list.

APPENDIX I

SCOPING MEETING DISPLAY BOARDS



Casper Resource Management Plan Revision

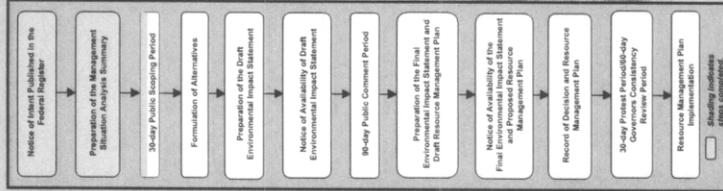


RMP Revision Process

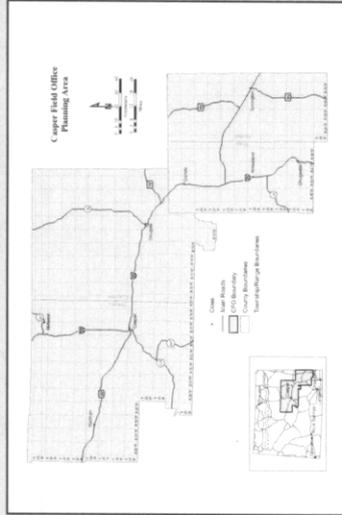
The BLM will consider the following throughout the RMP revision.

- Observe multiple use and sustained yield;
- Use a systematic interdisciplinary approach;
- Give priority to designating and protecting special management areas;
- Consider present and potential uses of public land;
- Consider and solicit public input throughout the process; and
- Coordinate with applicable tribal, federal, state, and local agencies.

Where do we go from here?



Casper Field Office Planning Area

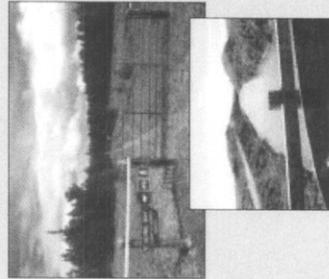


The Casper Planning Area includes 1.4 million acres of BLM-administered surface land and 4.7 million acres of BLM-administered mineral estate in Converse, Goshen, Natrona, and Platte counties.

Individual County Acreage

County	Acres
Natrona	1,124,191
Converse	129,911
Platte	81,943
Goshen	25,173

Land use plans and planning decisions are the basis for everyday on-the-ground action the BLM undertakes.



Acronyms and Definitions

National Environmental Policy Act (NEPA) - is our country's charter for protection of the environment. It requires all federal agencies to evaluate the impact of proposed major federal actions (in this case the RMP revision) with respect to their significance on the human environment.

Federal Land Policy and Management Act (FLPMA) - governs administration of public lands by the Bureau of Land Management (BLM). The act establishes the commitment to retain ownership of public lands, improve deteriorated lands, and manage lands to ensure productive capacity in perpetuity.

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Scoping - is the process that federal agencies use to identify public and agency issues and concerns relating to management actions on federal lands. Scoping is the process of identifying the range of consideration, issues, management concerns, preliminary alternatives, and other components of and EIS and RMP.

Preliminary Planning Issues - Preliminary planning issues represent the BLM's knowledge to date on existing issues and concerns with the current RMP.



Casper Resource Management Plan Revision



Air Quality

Air quality in the planning area is assumed to be excellent.



Soil

Soils in the Casper Planning Area are diverse and can vary significantly over relatively short distances.



Water

Water resources in the planning area are managed for multiple uses in agricultural, municipal, and industrial purposes. Water-based recreation and use by fish and wildlife are also prevalent. The North Platte, Cheyenne, Powder, Wind, and Niobrara River watersheds, which are all tributaries of the Missouri River, are within the planning area.

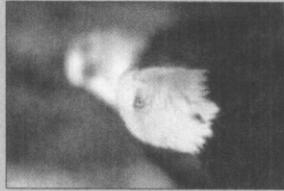
Preliminary Planning Issue:
- Air and water quality

Physical and Biological Resources

Fish and Wildlife Resources

Fish habitat in the planning area includes perennial and intermittent streams, lakes and reservoirs. Public lands within the Casper Planning Area provide habitat for 8 families and 27 species of fish.

Vertebrate wildlife species that occur in the Casper Planning Area represent all major vertebrate classes: reptiles, amphibians, fish, birds, and mammals.



Special Status Species

More emphasis is being placed on maintaining species diversity and keeping native ecosystems healthy to keep other species from becoming listed.



Vegetative Resources

- woodland and forest communities;
- riparian and wetland communities; and,
- grassland and shrubland communities; and,
- invasive, nonnative plant species.

Preliminary Planning Issues:

- Wildlife habitat and management of crucial habitat and migration corridors.
- Management and cumulative effect of land uses and human activities on threatened, endangered, candidate, and sensitive species and their habitats.
- Vegetation, including impacts of invasive non-native species.

Cultural Resources

More than 8,000 cultural resources have been documented to date on lands administered by BLM within the planning area.

Paleontology

Fossil deposits as old as 200 million years are exposed in the planning area.

Geology?

Fossil deposits as old as 200 million years are exposed in the planning area.



Visual Resources

Visual Resource Management in the Casper Planning Area focuses on values and resources existing throughout the planning area and covers views involving native landscapes and unique areas with high visual quality.

Preliminary Planning Issues:

- Management of cultural and paleontological resources; including National Historic Trails.
- Visual Resource Management.



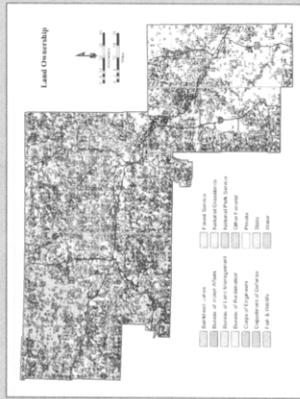
Casper Resource Management Plan Revision



Lands and Realty

The BLM Lands and Realty program is aimed at managing lands that host and support resource and management programs.

Land ownership in the Casper Field Office Planning Area consists of a complex of intermingled federal, private, and state lands, creating management challenge.



Transportation and Access

Transportation includes mass transit, access to public lands, and infrastructure management.



Utility and Communication Corridors



Preliminary Planning Issue:

- Access to and transportation on BLM lands
- Transportation on BLM Lands

Resource Uses

Minerals
Minerals include coal, oil and gas, locatable minerals, such as gold, silver, platinum, and copper, and saleable minerals, such as sand, gravel, flagstone and rock aggregate.

Coal
The BLM manages coal leasing and other administrative duties related to coal production from federal coal land. Wyoming has the largest federal coal program in the BLM. Wyoming is the nation's largest producer of coal, producing about 34 percent of the nation's coal.

Oil and Gas
The Casper Field Office is responsible for managing and supervising all exploration, development, and production operations on federal oil and gas leases in Converse, Natrona, Platte and Goshen counties. Wyoming is the number one producer of federal onshore oil and number two producer of federal onshore gas in the United States.

Locatable Minerals
The planning area has an assortment of minerals, including gold, silver, platinum, copper, chromite, and uranium. Converse, Goshen, Natrona, and Platte counties contain approximately 4,983 mining claims.

Salable Minerals
Salable minerals, such as sand and gravel, moss rock, flagstone, rock aggregate, and riprap are available on demand for sale and for free use.

Preliminary Planning Issue:

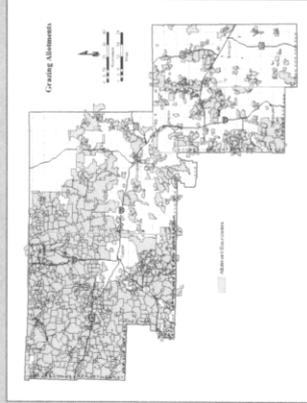
- Energy and mineral resource exploration and development

Forest Products

A total of 3,314 thousand board feet (MBF) of sawtimber was harvested from 1983 to 1991. Firewood, posts and poles were harvested as well. From 1992 to 2001 there has been no activity in the forest program due to the absence of funding, and no active forest management has occurred on forestlands from 1990 to 2001.

Livestock Grazing

The Casper Field Office manages lands for livestock grazing in Converse, Goshen, Natrona, and Platte Counties. The Casper Field Office administers 462 grazing leases, allowing approximately 200,000 animal unit months of livestock forage.



Recreation

Recreation opportunities and uses of BLM lands within the planning area include sight-seeing, touring, hiking, mountain biking, off-highway vehicle (OHV) use, photography, wildlife viewing, camping, fishing, and hunting.



Preliminary Planning Issues:

- Recreation and Off-Highway Vehicle management.
- Livestock grazing.

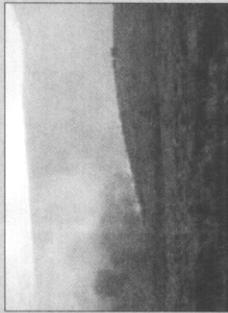


Casper Resource Management Plan Revision



Fire Management

The fire program in the Casper Planning Area has been managed to protect public safety, life and property while providing the maximum benefits of both prescribed fire and wildfire to overall resource management.



Annual Average Acres of Planned and Unplanned Fires in Different Vegetation Types

Vegetation	Average Number of Acres Burned/Year	Fire Type
Aspens and conifers	2 acres	Planned
Mountain big sagebrush	378 acres	Planned
Mountain mahogany	45 acres	Planned
Rocky Mountain juniper forest	3 acres	Planned
Subtotal	428 acres	
Greasewood-salt desert shrub	42 acres	Unplanned
Forest or woodlands	250 acres	Unplanned
Mountain shrubs	24 acres	Unplanned
Sagebrush grasslands	1,620 acres	Unplanned
Subtotal	1,936 acres	
Grand Total	2,364 acres	

Preliminary Planning Issue:
- Fire Management

Fire Management, Special Designations, Social and Economic Conditions

Special Designations

Special management areas are designated by the BLM to protect or preserve certain qualities or uses in specific areas. The environment in these unique areas is unique in some regard, so that it is desirable to apply different management to the areas than is applied to the surrounding public lands.



Muddy Mountain Environmental Education Area (EEA) - Muddy Mountain EEA was established in 1977 for recreation purposes and wildlife habitat.

Preliminary Planning Issues:
- Management of cultural and paleontological resources, including National Historic Trails.

Socioeconomic Conditions

All four counties in the planning area had lower unemployment in 2001 than the national average of 4.8 percent.

Average Earnings Per Job (2000)

Locality	Average Earnings Per Job
Natrona County	\$32,442
Converse County	\$25,210
Platte County	\$23,800
Goshute County	\$23,051
Wyoming	\$27,037
United States	\$36,316

Environmental Justice

Executive Order 12898, enacted in 1993, requires that each federal agency make achieving "environmental justice" part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority and low-income populations.

Health and Safety

The two primary health and safety concerns of the Casper planning Area involve abandoned mines and hazardous waste.

Hazards are not always apparent to an unauthorized visitor, a hiker, or an off-highway vehicle (OHV) user enjoying outdoor recreation.



Casper Resource Management Plan Revision

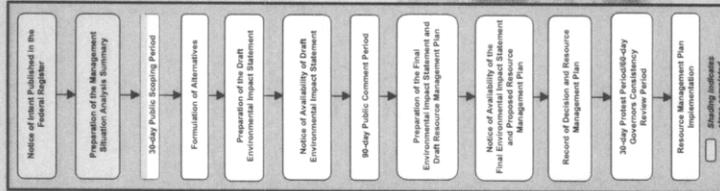


RMP Revision Process

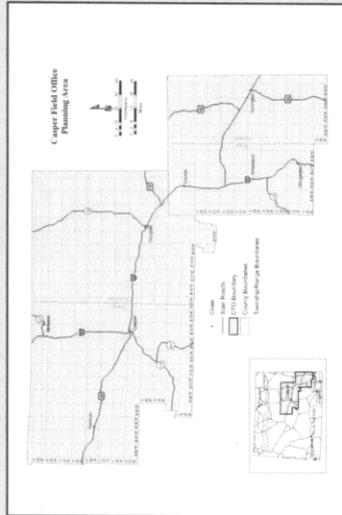
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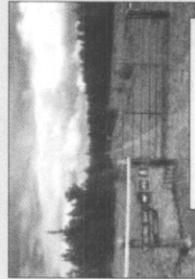
Where do we go from here?



Casper Field Office Planning Area



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APPENDIX J

SCOPING MEETING FACT SHEETS



Fact Sheet 1

Casper Resource Management Plan Revision

BUREAU OF LAND MANAGEMENT
Casper Field Office Planning Area, Wyoming



November 2003

Guide to the Four Fact Sheets

☛ Fact Sheet 1: RMP Revision Process

Fact Sheet 2: How You Can Participate
Fact Sheet 3: Preliminary Planning Issues
Fact Sheet 4: RMP Revision Topics

What is the RMP Revision Process?

In 1985, the existing Resource Management Plan (RMP) was completed. Since 1985, the RMP has undergone many maintenance-related actions. The Federal Land Policy and Management Act (FLPMA) requires the Bureau of Land Management (BLM) to develop RMPs and to update or revise the RMP when appropriate. The approach to the Casper RMP revision includes building on experience, new science, and working with collaborators.

What Does it Mean? An Acronym Guide for the RMP Revision.

The Casper Field Office is undertaking a revision of its RMP. An Environmental Impact Statement (EIS) will also be included as part of the revision. Fact Sheet 2 contains a guide to the revision process. Below are commonly used terms:

National Environmental Policy Act (NEPA) – is our country's charter for protection of the environment. It requires all federal agencies to evaluate the impact of proposed major federal actions (in this case the RMP revision) with respect to their significance on the human environment.

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Preliminary Planning Issues – represent the BLM's knowledge to date on issues with the existing RMP.

For more information or to comment contact:

Linda Slone
BLM Casper Field Office
2987 Prospector Drive
Casper, Wyoming 82604
(307) 261-7600

<http://www.blm.gov/rmp/casper>



Fact Sheet 2

Casper Resource Management Plan Revision

BUREAU OF LAND MANAGEMENT
Casper Field Office Planning Area, Wyoming



November 2003

Guide to the Four Fact Sheets

Fact Sheet 1: RMP Revision Process

☛ **Fact Sheet 2: How You Can Participate**

Fact Sheet 3: Preliminary Planning Issues

Fact Sheet 4: RMP Revision Topics

How You Can Participate in the Resource Management Plan Revision

Throughout the revision process, there will be several opportunities for you to comment and provide your input. Public involvement is an essential part of the process. With public involvement and environmental analysis, the NEPA process will support the BLM in making informed decisions.

To the right is a diagram of the revision process and below is a description of the ways you can participate at different times in the process.

30-Day Scoping Period— The scoping period began with the publication of the Notice of Intent in the Federal Register on **June 20, 2003**. Although the BLM Resource Management Planning Regulations (43 CFR 1610.2) include a 30-day scoping period, the RMP scoping period is 5 months and will close on November 20, 2003. A series of public meetings will be held throughout the planning area to provide you with information and solicit your comments and input.

90-Day Public Comment Period— After the Draft EIS is published (Winter 2004/2005), you will have an opportunity to provide comments and input again.

30-Day Protest Period— After the Final EIS and RMP are released you have an opportunity to protest the selected management alternatives.

Newsletters— Throughout the planning process, we will be sending those of you on the mailing list schedule updates, opportunities for public input, and other relevant information.

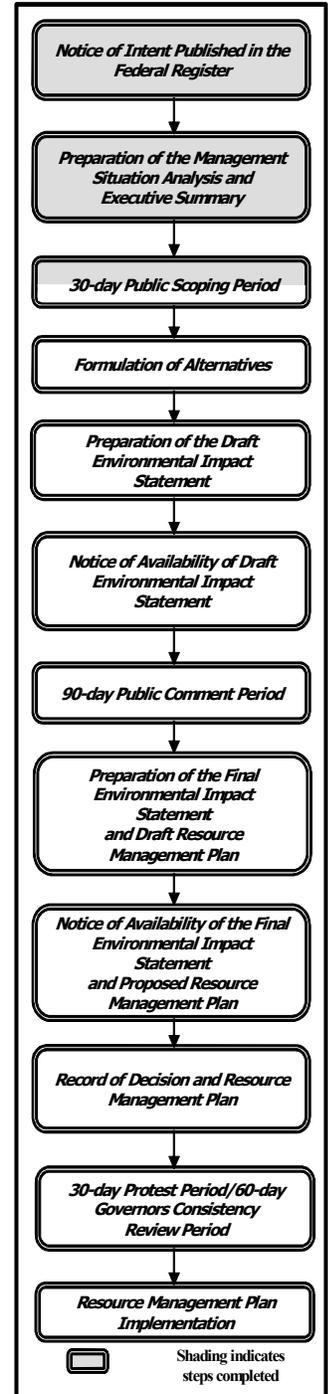
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BLM RMP Website— We have created a RMP website at www.blm.gov/rmp/casper where you can find up to date information on the RMP process and upcoming events or key documents. There is a page on the website where you can add your name to the mailing list and submit comments!

Where do we go from here?





Fact Sheet 3

Casper Resource Management Plan Revision

BUREAU OF LAND MANAGEMENT
Casper Field Office Planning Area, Wyoming



November 2003

Guide to the Four Fact Sheets

Fact Sheet 1: RMP Revision Process

Fact Sheet 2: How You Can Participate

☛ **Fact Sheet 3: Preliminary Planning Issues**

Fact Sheet 4: RMP Revision Topics

What Issues are We Considering in the Resource Management Plan Revision?

We are interested in considering important and pertinent issues in the revision of the RMP for the Casper Field Office Planning Area. Issues represent opportunities, conflicts, or problems about use or management of public land resources. The resolution of issues is the basis for preparing the RMP. Below is a list of the preliminary planning issues we are considering so far. Other issues are identified in the MSA Summary. If you feel there are additional issues that we have not considered, please contact us by the means indicated below.

Preliminary Planning Issues

- A. Energy and mineral resource exploration and development;
- B. Access to and transportation on BLM lands;
- C. Recreation and Off-Highway Vehicle management;
- D. Wildlife habitat and management of crucial habitat and migration corridors;
- E. Management and cumulative effect of land uses and human activities on Threatened, Endangered, Candidate, and Sensitive species and their habitats;
- F. Vegetation, including impacts of invasive non-native species;
- G. Management of cultural and paleontological resources, including National Historic Trails;
- H. Land ownership adjustments;
- I. Fire management;
- J. Livestock grazing;
- K. Visual Resource Management; and,
- L. Air and water quality.

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Fact Sheet 4

Casper Resource Management Plan Revision

BUREAU OF LAND MANAGEMENT

Casper Field Office Planning Area, Wyoming



November 2003

Guide to the Four Fact Sheets

Fact Sheet 1: RMP Revision Process
Fact Sheet 2: How You Can Participate
Fact Sheet 3: Preliminary Planning Issues

☛ **Fact Sheet 4: RMP Revision Topics**

What Topics are We Considering in the Resource Management Plan Revision?

The BLM manages and administers resources and uses throughout the planning area. To comment on these resources or uses go to www.blm.gov/rmp/casper.

Physical and Biological Resources

Air Quality — Includes overall air quality and emissions and can include smoke and dust.

Cultural Resources — Includes historic and prehistoric artifacts, buildings, structures, mines, trails, railroads, ditches, trash dumps, historic landscapes, and archeological sites. Cultural resources may also include Traditional Cultural Properties (TCP), which are properties that are critical to a living community's beliefs, customs, and practices.

Fish and Wildlife — Includes species of fish and fisheries habitat in streams, lakes, and ponds. Also includes vertebrate wildlife species that occur in the planning area including reptiles, amphibians, birds, and mammals. Does not include threatened, endangered, sensitive, or other special status species.

Geology — Includes physiography, earthquakes, landslides, topography, floods, snowslides, and slumps.

Paleontology — Includes fossils, dinosaur remains, paleontological digs, and research permits.

Special Status Species — Includes plant and animal species that are listed as threatened or endangered in accordance with the Endangered Species Act. Also includes BLM-designated sensitive species.

Soil — Includes soil disturbance from mineral extraction, erosion and surface runoff

Vegetation — Includes grassland and shrubland communities, riparian and wetland communities, woodland and forest communities and invasive non-native plant species. Does not include special status plants.

Visual Resources — Includes scenic views, visual quality, visual resource management (VRM), and overlooks.

Water — Includes water quality and quantity.

Resource Uses

Minerals — Includes coal, coalbed methane, oil and gas, locatable minerals (such as uranium and bentonite), and salable minerals (such as sand, gravel, and decorative stone).

Lands and Realty — Includes rights-of-way for pipelines, utilities and roads, land acquisition and disposal, easements, withdrawals, land use authorizations and trespass identification and abatement.

Livestock Grazing — Includes grazing allotment issues, grazing leases, range improvement projects, livestock fences, livestock reservoirs, springs, water wells, and vegetative treatments.

Recreation — Includes sight-seeing, touring, hiking, mountain biking, backpacking, photography, wildlife viewing, camping, fishing and hunting.

Renewable Energy — Includes wind energy, geothermal resources, solar power/energy, and other sources.

Transportation and Access — Includes mass transit, access to public lands, and infrastructure management.

Fire Management

Includes naturally occurring fires and prescribed burns, as well as fire suppression techniques.

Special Designations

May include designations such as Areas of Critical Environmental Concern (ACEC), National Historic Trails, Recreation Management Areas, and Wilderness Study Areas.

Social and Economic Conditions

Includes health and safety issues, economic development, and environmental justice.

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APPENDIX K

COMMENT FORM

