

PINEDALE ANTICLINE PROJECT AREA Supplemental Environmental Impact Statement Record of Decision Implementation Report to the Public



On September 12, 2008, the Record of Decision (ROD) for the Supplemental Environmental Impact Statement (SEIS) for the Pinedale Anticline was signed. The SEIS assessed the effects of an industry request for year-round access to all lands in the Pinedale Anticline Project Area (PAPA) for oil and gas development. The proposal also consolidated oil and gas development and infrastructure to substantially reduce human and truck presence in those areas designated as wildlife crucial winter range and sage-grouse nesting habitat.

The year following the ROD signing has involved a tremendous effort on the part of the public, Wyoming Game & Fish, US Fish & Wildlife Service, Wyoming Department of Environmental Quality, Sublette County Conservation District, State of Wyoming, Sublette County and various towns throughout, and the BLM to mitigate the impacts of development in the PAPA. A multi-faceted approach was adopted through commitments in the ROD to facilitate the multiple-use mandate required of the BLM on public land, while preserving and protecting existing resources within the Anticline and surrounding communities.

Many of these commitments had deadlines within one year of the signing of the ROD; the success of meeting these deadlines is detailed below.

Air Quality

Did modeled visibility impacts exceed 40 days of visibility impairment over 1 deciview (dv) at the Bridger Wilderness Area?

On September 8, 2009, WYDEQ submitted a letter to the BLM detailing the visibility threshold. Preliminary data suggested that visibility impacts did not exceed 40 days of visibility impairment. This data was forwarded to the BLM Wyoming State Office air quality analyst who concurred that the ROD requirement of no more than 40 day's visibility impairment for 2009 had been met.

Did Operators develop a 10-year rolling forecast to report the anticipated activity levels and projected air emissions in the PAPA and achieve visibility impact reduction?

Yes. These detailed emissions inventories are to be included with the rolling development forecasts required at the Annual Planning Meeting with a caveat that beyond the first two years, emission projections are tentative and subject to change.

Did Operators adopt air emission control strategies to reduce visibility impacts?

Yes. These strategies include installing emission control technologies such as Selective Catalytic Reduction (SCR) on drill rigs, control devices on heat trace pumps, dehyds, and water/condensate storage tanks, and "no bleed level controls" at facilities; ensuring frac and rig engines are EPA Tier 1 or Tier 2 certified; electrification of generators; usage of Ultra Low Sulfur Diesel (ULSD) on drill rigs; piping recycled flowback water; and bussing of rig personnel to and from worksites.

Did the BLM, WDEQ and Operators, with input from EPA, refine the NOx and VOC emissions inventory?

Yes. A regional five-county (Lincoln, Uinta, Sweetwater, Carbon and Sublette) inventory for 2005 and 2006 has been created in conjunction with the Continental Divide Creston project, which includes a rigorous accounting of VOC emissions. This inventory, in conjunction with supplemental local emissions information and broader regional emissions information, will be used as a basis for regional ozone modeling. Pinedale Anticline Operators have submitted annual emission inventories for 2008 and detailed winter inventories for February and March, 2009.

Did Operators conduct and fund new modeling to include all WDEQ BACT requirements and a sensitivity analysis to determine appropriate reductions in ozone precursor emissions?

This is in process. A contractor has been selected and provided with some raw data to evaluate and process. A modeling protocol is being developed which will have to be reviewed and approved by the BLM in consultation with WDEQ and the EPA before modeling can go forward.

Did the BLM, WDEQ and EPA evaluate these modeling results?

Not yet. This step will follow after the modeling has been completed.

Did Newfield, Yates and Anschutz demonstrate a reduction in volatile organic compounds (VOCs) comparable to that obtained through installation of a liquids gathering system (LGS)?

Yes. These Operators have submitted letters acknowledging the approach that WDEQ recommends and describing ways in which this approach will be met. Newfield, Yates and Anschutz have until September 2010 to fully implement this requirement.

Did Operators submit individual contingency plans developed to address avoidance of wintertime ozone exceedances?

Yes. A letter was received by the BLM from DEQ documenting and approving Operator compliance.

Did DEQ prepare a report on air toxics, potential chemicals of concern and ozone exposure levels?

This is in process.



Was an Annual Planning Meeting (APM) held between the BLM, other agencies and Operators to obtain drilling locations and evaluate adaptive management actions?

Yes. The first APM was held in February 24 and 25, 2009; the next one is tentatively scheduled for February 23, 2010.



Was the Pinedale Anticline Project Office (PAPO) successfully organized?

Yes. The Charter was executed on December 8, 2008; the Organization Plan and Communication Protocol were completed on May 7, 2009, the Escrow Agreement was signed on December 17, 2008, and the Board was fully appointed on March 6, 2009.



Was the Pinedale Anticline Livestock and Agriculture Mitigation Fund Memorandum of Agreement (MOA) updated and permittee advisors elected?

Yes. The MOA was signed on July 7, 2009.



Was a reclamation monitoring plan developed to incorporate interim and final standards?

Yes. The plan was signed on September 14, 2009 because September 12, 2009 was a Saturday.

Did Operators prepare Reclamation and Monitoring Plans including appropriate quantitative and qualitative reclamation and monitoring standards and submit surface disturbance reports including "as built" GIS data?

This requirement was covered by the BLM's Reclamation Monitoring Plan signed on September 14, 2009.

Water Resources

Was an Interim Groundwater/Aquifer Pollution Prevention, Mitigation, and Monitoring Plan completed?

Yes. The Plan was published on January 6, 2009. Several Plans of Study were finalized to address its technical aspects and are available at: http://www.blm.gov/wy/st/en/field_offices/Pinedale/anticline.html

Did Operators install backflow prevention devices and locks on all water supply wells?

Yes. Installation was completed by all Operators by March 1, 2009.

Wildlife

Was a Wildlife Monitoring and Mitigation Plan prepared?

Yes. The Plan was signed on April 1, 2009. It is a living document.

Currently, the Pinedale Anticline Working Group (PAWG) continues to function as a carry-over from the 2000 ROD and is anticipated to convene for as long as the BLM authorized officer (AO) deems it necessary.

The liquids gathering system (LGS) was not listed above because its deadline is September 2010. However, installation of the LGS by Ultra, Shell and Questar is ongoing and anticipated to meet its deadline.

There has been an outgrowth of activity not required by the ROD but which has facilitated compliance with its requirements. One such activity is the Quarterly Planning Meetings with Operators. These meetings have proven to be very effective during the two-year transition period at improving communication between the February Annual Planning Meetings.

Many commitments made in the 2008 ROD are ongoing, open-ended, or have set deadlines. Each year, a review will be made of these commitments and a Report to the Public prepared.

For more information on PAPA FSEIS ROD commitments, please visit our website at:

http://www.blm.gov/wy/st/en/field_offices/Pinedale/anticline.html