



July 8, 2009

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Via Email to Fort_Crk_WYMail@blm.gov and U.S. Mail to:

Duane Spencer
Bureau of Land Management
Buffalo Field Office
1425 Fort Street
Buffalo, WY 82834

Re: Williams' Comments on Environmental Assessment for Lance Oil and Gas Company's Augusta Unit Zeta POD

Dear Mr. Spencer:

Williams Production RMT Company ("Williams") appreciates the opportunity to submit comments on the Bureau of Land Management's ("BLM") Environmental Assessment for the Lance Oil and Gas Company Augusta Unit Zeta Plan of Development ("POD"). Williams and Lance have joint interests in various projects in the Powder River Basin. In addition, Williams holds federal leases in the general area of the Augusta Zeta POD, the development of which could be subject to similar conditions as those placed on the Augusta Zeta POD.

Williams submits this letter in support of the comments provided by Lance and hereby incorporates those comments by reference. Williams continues to be concerned with BLM's use of the University of Montana sage-grouse habitat models as the exclusive tool for identifying high-quality sage-grouse habitat. Site surveys are more reliable and precise and should be utilized when available. Further, Williams specifically raises the following issues for BLM's consideration. First, requiring monthly work summary reports for activity in elk habitat is relatively burdensome given the limited utility of monthly information to potential elk adaptive management measures. Second, limiting site visits to once a month presents unnecessary safety, environmental, and operational hazards.

A. Monthly Work Reports in Elk Habitat are Unduly Burdensome

BLM conditions approval of the August Zeta POD on submission to BLM of a monthly work summary report, including a listing of activities conducted and their location and timing. Augusta Zeta EA, at 29. The report must also include any elk observations. The states purpose of these reports is to "enable elk responses to be evaluated for possible adaptive management alternatives development." Augusta Zeta EA, at 9.

First, it is doubtful that unsystematic and anecdotal elk observations in monthly work summary reports will provide sufficient scientific basis to support adaptive management. And there is no discussion in the EA of exactly how these monthly reports will be used or the possible adaptive management that could be employed or changed on a monthly basis in response to the observed

elk activity. In any case, requiring a monthly report is unduly burdensome. BLM could obtain the same utility of information from much less frequent reports, such as quarterly or semi-annual reports. Adaptive management is more likely to be implemented in these timeframes than on a month-to-month basis.

B. Limiting Site Visits To Once a Month Poses Safety, Operational, and Environmental Hazards.

Another condition imposed on the Augusta Zeta POD is a limitation on well metering, maintenance, and other site visits to the POD of one visit per month during the breeding and nesting season (March 1 – June 15) for the life of the project. Augusta Zeta EA, at 35. This restriction is unduly burdensome and poses unnecessary safety, operational, and environmental risks.

From an operational and safety standpoint, multiple visits per month are required to identify needed repairs, make plans for addressing any problems, and then perform any required repairs or maintenance. Not all problems can be detected by remote sensing equipment, *e.g.* pipeline/flowline leaks (both gas and water) along with electrical problems or hazards that could ultimately result in fire or injury. Only by site visits will an operator be able to ensure that its equipment is in working order and no leaks or other problems have developed on the POD. Identifying problems early is critical to avoiding larger safety and environmental hazards, such as water leaks, gas leaks, fire/safety hazards, and wildlife issues. Further, if the operator does identify a problem, it is not likely that the necessary repair can be accomplished during the same visit. Multiple visits may be required to address the issue.

Further, the August Zeta POD is interspersed within existing fee well development, which will be monitored by Lance on a more frequent basis. From a sage-grouse conservation perspective, prohibiting the operator from inspecting federal facilities and well sites while already in the field to monitor fee facilities and well sites makes little sense. No greater disturbance will occur to the sage-grouse than would inevitably occur from site visits to fee locations. Limiting the operator's ability to engage in prudent monitoring activity will only expose the federal development and the surface owner to a greater risk of potential leaks, safety hazards, and wildlife and other environmental issues that may go unattended.

Thank you for considering Williams' comments regarding the Augusta Zeta EA. Please contact me with any questions.

Sincerely,



Brian Wold
Director Powder River Basin
Williams Production RMT Company