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Bureau of Land Management
BLM Buffalo Field Office
1425 Fort Street
Buffalo, Wyoming 82834

Re: Comments On Anadarko's Augusta Unit Zeta CBNG POD

To Whom It May Concern:

Thank you for allowing public comment on Anadarko's Augusta Unit Zeta CBNG POD.

Regarding Alternative C:

1. Under protections for Big Game, item No. 3, page 29, the Operator will be required to prepare a detailed work summary report every 30 days to include the following information:
 - a. Work activities of the previous month
 - b. What activities were conducted
 - c. Where the activities were conducted
 - d. Proposed activities for the next month
 - e. Any elk observations

Comment: The stated intent of this requirement is to relate specific Operator activities in the field to impacts on the elk using anecdotal data reported by the oil and gas lease Operator. Inherent in this requirement is the assumption that field employees have the ability to distinguish elk from other big game, distinguish between males and females, are knowledgeable enough to report meaningful behavior, have no cognitive bias, etc. The requirement burdens the Operator with excessive paperwork and conclusions drawn from the observation data may not be scientifically defensible. Finally, requiring a submittal every 30 days is overkill. There should be more time between submittals, perhaps every six months would be more appropriate.

2. Under protections for Sage-Grouse, item No. c, page 35, well site visits will be restricted to one visit per month during breeding and nesting season (March 1-June 15)

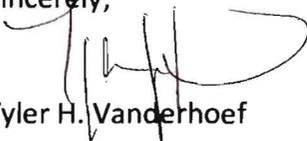
Comment: The imposition of site visit limitations of any nature opposes other legal requirements placed on the Operator by Federal and State governments. Numerous regulations charge the Operator of federal oil and gas leases with an affirmative responsibility to:

- a. Prevent waste;
- b. Assure proper measurement, disposition, and protection of production;
- c. Ensure environmental and safety obligations

Operators uniformly agree that consistent and reliable access to well sites and other facilities should not and cannot be impeded. The frequency and duration of well site and facility visits for the purposes of maintenance, compliance with regulations, permits and policies, must reflect the unique situation and circumstances of each well site, each operator, and their respective facility operational criteria. The 30-day site visit criteria has no scientific basis and is inconsistent with such requirements as inspection frequency under storm water permits, Spill Prevention Control and Countermeasure Plans and good operational practice. It is in the best interests of the Operator, the Public and the larger goal of protecting the whole environment to remove site visit limitations of any nature from the select alternative.

Thank you again for allowing public comment on this document.

Sincerely,



Tyler H. Vanderhoef