



**U.S. Department of the Interior**  
Bureau of Land Management  
Kemmerer Field Office, Wyoming

January 2006



**Moxa Arch Area Infill Gas  
Development Project EIS**

**Scoping Report and  
Summary of Public Scoping  
Comments**



**Scoping Report and Summary of Public Scoping Comments**

**Moxa Arch Area Infill Gas Development Project  
Environmental Impact Statement**

Prepared for:

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## **EXECUTIVE SUMMARY**

This report documents the public scoping process for the Bureau of Land Management (BLM) Kemmerer Field Office (KFO), Moxa Arch Area Infill Gas Development Project Environmental Impact Statement (EIS). The scoping period began on October 7, 2005, with publication of a Notice of Intent in the Federal Register, and ended on December 2, 2005. This Scoping Report includes a description of the scoping process; a description of the four public scoping meetings; a summary of the comments submitted by the public; and an overview of the issues identified through all scoping comments.

The purpose of “scoping” is to identify issues important to the project EIS. These issues will guide development of alternatives that will be evaluated in the EIS. The scoping process also provides an opportunity to educate the general public about the project and for the BLM to gauge the concerns of those who have a stake in the resources of the area.

Scoping meetings were held in Evanston, Wyoming on November 14, 2005; Rock Springs, Wyoming on November 15, 2005; Lyman, Wyoming on November 16, 2005; and Kemmerer, Wyoming on November 17, 2005. Meetings were held at 6:00 PM at each location, and a brief presentation of the project and the National Environmental Policy Act (NEPA) process began at 6:30 PM each night. A total of 13 individuals from the public registered at the scoping meetings; no attendees verbally presented their comments, and no attendees submitted written comments at the meetings. The BLM also accepted comments via letter, facsimile, and electronic mail during the scoping period.

During the official scoping period, approximately 195 comments were received from 17 respondents through various methods. For organization and analysis purposes, comments were categorized into the following 15 topic areas:

- Ranching and Grazing
- Air Quality
- Wildlife
- Transportation
- Recreation
- Economics
- Water
- Cultural Resources
- Noxious Weeds
- Health and Human Safety
- Surface Disturbance
- Environmental Quality
- Best Management Practices (BMPs)
- General Industry Comments
- Other General Comments

Ranching/Grazing and Wildlife are the two categories that received the most comments for a specific topic (31.7%). The third category receiving the most comments (22.6%) was the Other General Comments category. Although fewer in number, comments were also received focusing on the other 12 topics identified above.

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## **INTRODUCTION**

Oil and gas companies operating in the area known as the Moxa Arch have proposed to continue to drill additional development wells in their leased acreage within the Moxa Arch oil and gas development area in southwestern Wyoming. Oil and gas leases covering these lands are issued by the Bureau of Land Management (BLM) for the United States government, the State of Wyoming, and private owners.

Since the issuance of the Expanded Moxa Arch Natural Gas Development Project Environmental Impact Statement (EIS) and Record of Decision (ROD) in 1997, drilling activities have been conducted that have led to the development of about 1,400 producing gas wells in the area as of February 2005. Because of the success rate of drilling activities conducted since the issuance of the 1997 Expanded Moxa Arch Area EIS, the Operators anticipate that infill drilling would facilitate the extraction of additional gas resources and extend production. The Operators propose to infill drill within the same approximately 476,300-acre project area analyzed in the Expanded Moxa Arch EIS. The Operators' proposal to conduct infill drilling among the existing wells is based on the two zones, the core and the flank, described and illustrated in the Expanded Moxa Arch EIS. Of the additional wells proposed by the Operators, approximately 1,226 would be drilled in the proven production or "core" area and 635 in the remaining "flank" area. The anticipated life of each producing well is expected to be about 40 years.

The Project Area includes approximately 476,300 acres of mixed federal, state, and private lands in Sweetwater, Lincoln, and Uinta counties. The Kemmerer Field Office (KFO) manages BLM surface lands and the federal mineral estate within the Project Area. The Project Area is located within Townships 15 through 23 North, Ranges 111 through 113 West, 6<sup>th</sup> Principal Meridian. It lies in an area west of Green River, Wyoming, east of Lyman and Opal, Wyoming, and south of the Fontenelle Reservoir.

In compliance with the National Environmental Policy Act (NEPA), the KFO initiated a scoping process to determine issues related to the preparation of the EIS for the proposed project. This report describes the scoping process, the methods of comment retrieval and analysis, and a summary of issues brought forward during scoping categorized by resource area.

## **SCOPING PROCESS**

Scoping is the process required by NEPA in the early stages of developing an EIS to determine the scope and significance of issues related to a proposed action, in this case, the Moxa Arch Area gas development infill project (40 CFR 1501.7). Knowing the scope and the significance of issues allows for an accurate and timely environmental analysis. In addition, scoping helps identify issues important to the management of the area, as well as issues to be examined in the planning process. The scoping process is designed to encourage public participation and to solicit public input. Although only one of the many steps in the planning process, scoping is an essential step to ensure that all issues are brought to the table. Rationale will be provided in the EIS for each issue included. Alternatives will then be

developed and analyzed incorporating the issues identified during the scoping process and the Draft EIS will be published and made available for public review.

In accordance with the project schedule, the scoping process formally began with the publication of the Notice of Intent (Appendix A), documenting the BLM's intent to prepare an EIS. Throughout the scoping period, interested individuals and organizations, affected federal, state, and local agencies, as well as affected Native American Tribes, were invited to submit comments to the BLM. Although the official scoping period ended December 2, 2005, the BLM will consider issues brought forward any time during the planning process; however, only comments submitted during, and shortly thereafter, the scoping period are summarized in this report.

## **PUBLIC SCOPING MEETINGS**

Public scoping meetings provide an opportunity for interested parties to submit scoping comments and may be a part of the early and open scoping process NEPA requires (40 CFR 1501.7). These meetings are especially important when there is "substantial environmental controversy concerning the proposed action or substantial interest in holding the [meeting]" (40 CFR 1506.6c1).

The Public Scoping Notice (Appendix B) announced four public scoping meetings. Public notice of the scoping meetings was published in the following newspapers: *Casper Star-Tribune*, *Rock Springs Rocket-Miner*, *Kemmerer Gazette*, *Uinta County Herald*, *Bridger Valley Pioneer*, and the *Little Chicago Review*.

A press release was sent to all the above newspapers, as well as the radio stations KUGR, KZWB, KYCS, KFRZ, KAOX, KDWY, KOTB, and KEVA for airing of public service announcements. The four public meetings were held over a one-week period in mid-November. The meetings were held in Evanston, Wyoming on November 14, 2005; Rock Springs, Wyoming on November 15, 2005; Lyman, Wyoming on November 16, 2005; and Kemmerer, Wyoming on November 17, 2005. Meetings were held at 6:00 PM at each location, and a brief presentation of the project and the NEPA process began at 6:30 PM each night. The total registered attendance for all four meetings was 13 people, with some people attending more than one meeting. Industry representatives attending the meetings are not included in this total. Table 1 illustrates the attendance at each scoping meeting.

**Table 1. Scoping Meeting Attendance**

<b>Meeting Location</b>	<b>Meeting Date</b>	<b>Attendance</b>
Evanston, Wyoming	November 14, 2005	0
Rock Springs, Wyoming	November 15, 2005	1
Lyman, Wyoming	November 16, 2005	9
Kemmerer, Wyoming	November 17, 2005	3
Total Attendance		13

Attendance at each public scoping meeting was recorded using a sign-in sheet at the registration station at each meeting location. An example of this sign-in sheet is provided in Appendix C. A number of handouts were made available to the public, including the scoping notice, comment cards, and postcards to fill out to be added to the interested parties list.

Comments were solicited in a manner that provided an opportunity for everyone attending the public meetings to provide input. Paper comment cards were provided to attendees so that individual comments could be written and handed to a BLM representative or mailed to the KFO.

### **INFORMAL MEETING COMMENTS**

While each public scoping meeting raised unique issues and concerns, a number of common elements materialized. No “written” comments were received during the scoping meetings. Informal comments addressed to BLM staff during conversations after the formal presentation were not formally recorded, but noted in general.

A variety of scoping meeting comments surfaced during informal conversations with BLM staff, including, but not limited to, the following:

- Potential jobs that may be brought to the area if the proposed action goes into effect.
- NEPA process and proposed schedule.
- Number of wells per section now and what will occur in the interim.
- Potential for directional drilling.

### **WRITTEN SCOPING COMMENTS**

In addition to receiving comments during the public scoping meetings, the KFO also received comments through the mail, fax, and e-mail. Written comments summarized in this report were received during the scoping period (October 7 through December 2, 2005), as well as comments that were received shortly after the deadline, yet postmarked by December 2, to compensate for mail delay.

### **METHOD OF SUBMITTAL**

Written scoping comments were accepted via mail, e-mail, and facsimile resulting in a total of 17 responses, containing 195 substantive comments (Appendix D) and two non-substantive comments (Appendix E). A response is defined as one email, fax, or letter. Because some responses had more than one comment, the total number of comments received is greater than the number of respondents, or individuals who submitted comments. For example, one person could submit a response containing a comment on wildlife and another on grazing. Thus, this example would be calculated as one response and two comments. Table 2 presents the method for submittal of all responses.

**Table 2. Response Source Data**

	<b>Responses Received</b>
Mail/Fax	13
E-Mail	3
Scoping Meetings	0
	1
	17

**NUMBER AND TYPE OF COMMENTS RECEIVED**

Comments received during scoping were combined into one master database from which reports could be generated. Searches were conducted to group like comments. Each comment was provided an identification number that corresponded with the appropriate respondent information. Reports were created for comments and organized by comment type, source, and category. Each response was read in its entirety and all distinct comments were categorized for enumeration and analysis. Comments were enumerated using standard database and spreadsheet software. It should be noted that while the enumeration of various submittal types was performed separately, the comment analysis process considered all comments collectively.

Individual comments were categorized by primary topic, regardless of the position of the comment towards the topic. Several comments addressed more than one comment category, or topic; these comments were categorized by the driving topic unless the associated topics were of equal importance to the issue being presented, in which case the comment was placed under both comment categories. Examples of this include comments regarding directional drilling to decrease wildlife disturbance and habitat fragmentation. There are two potential topics presented, with the driving topic being that of preserving wildlife habitat. Comments categorized as “Other” generally discussed very broad management concepts or very specific issues.

The following table indicates the relative interest of respondents who submitted written comments towards various broad topics in a position-neutral perspective. This enumeration is not intended to show bias towards any issue; it is simply to indicate the level of interest in various issue areas. Comments were received from seven state agencies, three industry groups and companies, and seven other organizations or individual stakeholders (including local ranchers and environmental interest groups). All issues will be addressed equally in the EIS.

**Table 3. Comment Category Enumeration**

<b>Comment Category</b>	<b>Number Received</b>	<b>Percentage</b>
Ranching and Grazing	27	13.8%
Air Quality	12	6.1%
Wildlife	35	17.9%
Transportation	4	2%
Recreation	1	less than 1%
Economics	15	7.8%
Water	7	3.5%
Cultural Resources	3	1.5%
Noxious Weeds	5	2.6%
Health and Human Safety	2	1%
Surface Disturbance	15	7.7%
Environmental Quality	9	4.6%
Best Management Practices	7	3.6%
General Industry Comments	9	4.6%
Other General Comments	44	22.6%
<b>Total</b>	<b>195</b>	<b>100%</b>

## **COMMENT SUMMARIES**

The following sub-sections summarize the comments received during scoping by topic. This summary is intended to reflect all comments received during the scoping phase equally and does not attempt to assign weight or value to any input. This document is intended to assist the BLM in developing the scope of analysis to be conducted in the EIS on the basis of public input. Therefore, specific comments and context are not provided here, only ideas represented in those comments that can be applied directly to preparation of the EIS. For example, some respondents provided their views on the value (negative or positive) of oil and gas development; only the issue areas they raised in conjunction with their views are presented in this scoping summary report. Copies of the individual responses received during the scoping period are available for review at the KFO and the BLM Wyoming State Office.

### **RANCHING AND GRAZING**

Comments directed toward grazing focused on the loss of animal unit months (AUMs) and how the grazing permittees would be compensated for these losses. Respondent suggestions included hay or monetary compensation, providing new range improvements, or opportunities to buy land. There were concerns about other impacts to local economies that depend on ranching, and keeping ranchers informed and part of the process. There was much interest in the reclamation and monitoring process and the ability to control erosion and weed infestation. Other issues raised were the impacts of new or widened roads, property damage due to range improvements, loss of livestock to vehicle collisions, livestock competition with displaced game animals, proper fencing of well pads, and whether the proposed well density

was necessary or whether more directional drilling could be done. Ranchers' comments also focused on the potential to adversely affect private property values, the loss of open space, scenic vistas, and historic landscapes, especially with the checkerboard pattern of land management present.

## **AIR QUALITY**

Most comments directed toward air quality centered on the potential increase in emissions from sources such as drill rigs, compressors, and increased traffic into sites. Solutions were suggested, including using low-emission equipment, using dust suppressants on roads, and requiring car-pooling to work sites. There were requests for less or no flaring at wells, and more use of air quality modeling. Other comments were related to better monitoring with proper analyses and effective mitigation techniques when standards are not met or visibility is degraded. One individual noted being affected by odors, seemingly from wells, plants, or traffic; and another expressed concern over effects on ozone concentrations.

## **WILDLIFE**

A large variety of topics of concern directed toward wildlife were raised during scoping. Primary issues addressed include the protection of crucial ranges, winter relief habitat, and breeding/spawning/nesting and other reproduction areas. Species of concern mentioned were sage grouse, especially winter and breeding areas, pronghorn, and moose. Sensitive habitats listed included sagebrush steppes and fish-supporting waters. The general public had concerns about the effect of increased human activity on resident wildlife. Road-related issues included habitat displacement and fragmentation, more traffic/public access into habitats, and construction of roads on slopes causing more erosion and sedimentation.

Specific mitigating measures mentioned in comments included protecting leks from noise, conducting a pronghorn study, developing a Wildlife Monitoring Plan for sage-grouse winter use, analyzing sagebrush treatments effects on species, use of directional drilling to minimize habitat fragmentation and road building, maintaining connectivity and linkages between habitat parcels, focusing on the protection of keystone species and keystone resources (e.g., springs, mineral licks, riparian areas), not allowing surface disturbance until the Endangered Species Act (ESA) consultation process is complete, and conducting mitigation off-site. There was also a reference to following guidelines in the BLM manual "Special Status Species Management, MS-6840." Wyoming Game and Fish Department (WGFD) referred to their 2004 "Minimum Recommendations to Sustain Important Wildlife Habitats Affected by Oil and Gas Development" as the provisions to be adopted.

Suggestions for the EIS process included early ESA consultation with the U.S. Fish and Wildlife Service and using reputable scientists for the ESA analyses, making wildlife stipulations part of the proposed action, and disclosure of land disturbance by habitat/vegetation type. Respondents commented that data analyses should include compiling all available data (including that from the WGFD) to date for WGFD review; using scientifically supported methods to analyze indirect, related, cumulative, and long-term impacts, especially to sagebrush areas; and conducting a thorough documentation of ground

and surface water flows and quality to be able to analyze potential depletion effects to downstream listed fish.

## **TRANSPORTATION**

The most common concern related to transportation was avoiding the addition of more access points to Highway 30 between Opal and Granger. The Wyoming Department of Transportation expressed interest in being involved in transportation planning, particularly keeping gas field access to a minimum. Individual respondents suggested adding turn lanes to Highway 30 and/or using the old highway as a service road for oil and gas trucks. Increased traffic (especially trucks) was a general concern, including the increase in dust on unimproved roads. One individual expressed concern about additional crossings of riparian areas and suggested using bridges to reduce habitat disturbances.

## **RECREATION**

The major concern directed toward recreation was that additional public access to the gas field would increase hunter success and, therefore, reduce opportunities for other hunters. One comment was that license sales might decrease with increased success in the area. Also, there was concern that the presence of gas wells might decrease the areas in which hunting is allowed.

## **ECONOMICS**

Most opinions were that there would be a positive economic effect to local economies including towns, counties, the state, and public services through tax revenues collected from operators. The operators had their own concern about economic losses due to a delay in permitting, restrictions or stipulations that may be placed on drilling, and requests to use alternative drilling technologies (e.g., directional drilling). Comments were also received that encouraged covering the historical perspective of land use in the area (including oil and gas), and not to base economic analyses on the cost of well development but to collect data from local operators already doing business in the area. Other respondents had concerns about economic losses from decreased access to leases and general losses of grazing opportunities. There was also concern about decreasing property values with increased oil and gas activity.

## **WATER**

Comments directed toward water resources focused on potential effects to surface and ground water from releases of water used in construction or production, especially in riparian areas. There was concern this water would contain elements from the soil or other pollutants. Comments noted that some water features within the project area are already considered “impaired” and concern was that these would be further degraded, and potentially could be improved by mitigation. Other comments mentioned erosion and sedimentation, and new crossings affecting channel stability or increasing flow velocities. Suggestions included keeping seismic activity away from streams and wetlands, and following the state water quality standards. Landowners were also concerned about project water needs competing with private water rights.

## **CULTURAL RESOURCES**

The respondents primarily referred to conducting necessary consultations with state and tribal traditional and religious leaders. Also, there were requests to comply with pertinent federal acts and to perform sufficient inventories before groundbreaking activities to determine resource values. Respondents stated that if “at risk” areas are identified, protections should be placed on an adequate-sized parcel to facilitate management.

## **NOXIOUS WEEDS**

The most concern was voiced over the continued spread of halogeton and cheatgrass, and the loss of native species diversification. Respondents commented that the former has already adversely impacted the sheep industry. Suggestions were for the BLM to be aware of all the possible vectors for weed spread, work with landowners to develop native seed mixes, use mulch and some type of quick cover crop to reduce erosion, as well as comply with the federal Executive Order (13112). Another issue raised was poisonous plants. For the analysis, respondents would like to see the extent of the weed problems discussed along with probable causes, options for prevention, and restoration. One suggestion was to clean equipment before entry onto project sites.

## **HEALTH AND HUMAN SAFETY**

Public comments focused on the increase of workers leading to increased crime in the area in the form of thefts, trespassing, illegal hunting, and drug use. A general decrease of the feeling of safety was expressed. One respondent suggested mandatory drug tests for workers.

## **SURFACE DISTURBANCE**

These comments covered a variety of issues, including visual resources, riparian and habitat areas, and mitigation ideas. The most common comment was to decrease land disturbance by using directional drilling from existing pads. There was concern of degrading lands by adding to the cumulative effects from current disturbance.

Suggestions to minimize visual impacts included using low profile structures and natural topography, avoiding ridgelines, applying appropriate coloration, and keeping well pad size to the minimum necessary.

Riparian areas were singled out for protection. Where crossings are necessary, suggestions were to use only perpendicular angles, trenching of pipe for intermittent drainages and boring under for perennial drainages. A respondent commented that parallel pipelines should stay outside of the 100-year floodplains. Other comments were to crush instead of remove riparian vegetation where possible; use as small of a right-of-way (ROW) as practical; and revegetate as soon as possible.

One respondent stated that cumulative effects should take into consideration the conversion of mature vegetation into grasslands where seeding is conducted. Respondents were concerned about keeping total new disturbance on any one grazing lease less than 150 acres, not including reclaimed areas. Regarding surface disturbance, WGFD pointed out that the

proposed well density in the Core Area falls into their “high impact” category for some critical wildlife habitats, and early in the process the possibility for off-site mitigation and/or habitat replacement should be considered.

## **ENVIRONMENTAL QUALITY**

The largest concerns in this category were with noise impacts from drilling and ongoing operations given the remoteness of the area; the release of test waters directly into streams; and that sensitive, rare, and unique natural features and their ecosystems are adequately protected. The statement was made that according to Federal Land Management and Policy Act, the latter resources are more important on public lands for the American people than the extractable resources. Suggestions to minimize disturbances included piping oil and gas away from sites rather than trucking them, monitoring wells remotely, releasing test waters into retention basins, and conducting surveys for sensitive species so that areas where development is inappropriate can be identified and protected. Areas where disturbance effects are visible for long distances or long periods of time may also be taken into consideration.

## **BEST MANAGEMENT PRACTICES**

Many of these comments focused around hazardous material handling and the need to exercise caution in storage and disposal, especially around riparian and wetland areas. Compliance with all EPA and Wyoming requirements for stormwater discharge was suggested, as was designing well pads to drain to an adequate-sized pit. Published BLM oil and gas BMPs were referred to. Closed-loop drilling was preferred and/or using non-toxic drilling fluids with no reserve pit or evaporation of these fluids allowed. Drilling fluids should be disposed of off-site at licensed facilities. Commenters requested that production water be reinjected back into the formations where withdrawn, and that any holding ponds be lined and covered to protect birds. Comments indicated that drilling should only occur on areas of less than 25 percent slope; and that staging, storage, and refueling areas should be located more than 500 feet from wetlands, riparian areas, and floodplains. Respondents favor non-chlorine based deicers and dust control agents.

## **GENERAL INDUSTRY COMMENTS**

Several respondents requested the use of existing roads to the extent possible. It was mentioned that if “Gold Book” standards are used for roads, it may encourage more public access, which brings with it increased weed spread, poaching potential, off-road vehicle use, and other disturbances. Other suggestions included using existing ROWs for utilities, to bury utilities where possible, and to utilize anti-perching devices in areas where sage grouse may be present. Reference was made to federal and state protection policies for sage-grouse areas. Also, it was requested that any necessary lighting be redirected or shaded where possible. The public felt that the BLM should review appropriate well spacing based on best available environmental and technological data.

Industry respondents were concerned about “Adaptive Management” techniques that present unclear or changing goals and objectives that may favor special interest groups and be difficult for operators to comply with. Also, it was stated that the BLM should adapt BMPs to

fit new technologies where necessary. A number of respondents stated that operators have existing lease rights and access to them should not be restricted.

### **OTHER GENERAL COMMENTS**

Comments that were categorized as “Other” did not have a single theme that was easily identifiable. A sample of some of the comments categorized as “Other” are listed below:

- Utilize the 1996 EIS as much as possible to be efficient.
- Since the former EIS is almost 10 years old, new data should be gathered and analyses conducted in sound science manner according to NEPA, CEQ, FLPMA, and the Mineral Leasing Act regulations.
- Do not use Categorical Exclusions during APD process to reduce or eliminate site-specific analyses.
- Avoid additional environmental degradation.
- For cumulative effects, consider all activities in area that have affected habitats.
- BLM should work with proponents, state and local agencies as well as public.
- Use a whole ecosystem approach despite checkerboard land ownership.
- EIS purpose and need should consider environmental protection of public land.
- There should be rationale for all alternatives.
- Keep multiple uses in mind.

**APPENDIX A**  
**Notice of Intent**

[Federal Register: October 7, 2005 (Volume 70, Number 194)]  
[Notices]  
[Page 58738-58739]  
From the Federal Register Online via GPO Access [wais.access.gpo.gov]  
[DOCID:fr07oc05-112]

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## DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[WY-090-1310-DB]

Notice of Intent To Prepare an Environmental Impact Statement for the Moxa Arch Area Infill Gas Development Project, Lincoln, Sweetwater and Uinta Counties, WY

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) and to conduct scoping for the Moxa Arch Area Infill Gas Development Project (MAIP), Lincoln, Sweetwater, and Uinta Counties, Wyoming.

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SUMMARY: Under Section 102(2)(C) of the National Environmental Policy Act of 1969, as amended (NEPA), the Bureau of Land Management (BLM), Kemmerer Field Office, announces its intent to prepare an EIS on the potential impacts of a proposed natural gas development project consisting primarily of conventional gas well development, in the Moxa Arch area, Wyoming. The proposed additional wells would fill in or ``infill'' among existing wells drilled and developed under the Expanded Moxa Arch Area Natural Gas Development Project EIS and Record of Decision (ROD) (1997).

Drilling is proposed to occur over a 10-year period and the life-of-project is anticipated to be 40 years. The project area is located west of Green River, east of Lyman and Opal, and south of the Fontenelle Reservoir.

DATES: This notice initiates the public scoping process. The BLM can best use

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public input if comments and resources information are submitted within 30 days of the publication of this notice. To provide the public with an opportunity to review the proposal and project information, the BLM will host meetings in Evanston, Rock Springs, and Kemmerer, Wyoming, during fall 2005. The BLM will notify the public of the meetings' dates, times, and locations at least 15 days prior to the event. Announcement will be made by news release to the media, individual mailings, and posting on the BLM Web site listed below (if available).

ADDRESSES: Please send written comments or resource information to the Bureau of Land Management, Kemmerer Field Office, Michele Easley, Project Manager, 312 Highway 189 North, Kemmerer, WY 83101. Electronic mail may be sent to: [kemmerer\\_wymail@blm.gov](mailto:kemmerer_wymail@blm.gov). Please include ``ATTN: Moxa Arch Infill'' in the subject line. Additionally, the scoping notice will be posted on the Wyoming BLM NEPA Web page (if available) at <http://www.wy.blm.gov/nepa/nepadocs.htm>. If you are interested in

viewing material referenced or posted on the BLM Web site, please contact the Kemmerer Field Office as to its availability.

Your input is important and will be considered in the environmental analysis process. BLM will keep respondents informed of decisions resulting from this analysis. Please note that public comments and information submitted regarding this project, including respondents' names, street addresses, and e-mail addresses, will be available for public review and disclosure at the above address during regular business hours (7:45 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold any or all personal information from public review or from disclosure under the Freedom of Information Act, you must state this plainly at the beginning of your written comment. Such requests will be honored to the extent allowed by the law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

FOR FURTHER INFORMATION CONTACT: Bureau of Land Management, Michele Easley, Project Manager, 312 HWY 189 N, Kemmerer, Wyoming 83101. Ms. Easley may also be reached by telephone at (307) 828-4524, or by sending an electronic message to: [Michele.Easley@blm.gov](mailto:Michele.Easley@blm.gov).

SUPPLEMENTARY INFORMATION: The project area is generally located within Townships 15 through 23 North, Ranges 111 through 113 West, 6th Principal Meridian, Lincoln, Sweetwater, and Uinta Counties, Wyoming. The project area is bisected by Interstate 80 through its southern third. It includes approximately 476,260 acres of mixed Federal, State, and private lands in Sweetwater, Lincoln, and Uinta counties. Approximately 230,400 acres (48 percent) are managed by the BLM; 31,665 acres are managed by the Bureau of Reclamation (7 percent); 13,505 are owned and managed by the State of Wyoming (3 percent), and approximately 200,690 acres (42 percent) are privately owned. The Kemmerer Field Office manages the Federal mineral estate underlying the BLM-administered lands within the project area.

The project proponents are EOG Resources and other operators (henceforth referred to as the Operators) within the Moxa Arch area. Since the issuance of the Expanded Moxa Arch EIS, drilling activities have been conducted that have led to the development of about 1,400 producing gas wells as of February 2005. At that time, the Operators submitted to the BLM a proposal to infill drill within the same approximately 476,260 acre project area analyzed in the Expanded Moxa Arch EIS. The Operators propose to develop over the long term approximately 1,860 additional wells.

The Operators' proposal to conduct infill drilling among the existing wells is based on the two zones, the core and the flank, described and illustrated in the Expanded Moxa Arch Natural Gas Development Project EIS and ROD (1997).

About 1,400 producing gas wells, with their attendant service roads and pipelines, are currently active in the project area. Because of the success rate of drilling activities conducted since the issuance of the 1997 Expanded Moxa Arch Area EIS, the Operators anticipate that infill drilling would facilitate the extraction of additional gas resources and extend production. The Operators propose to infill drill and develop approximately 1,860 additional wells at the rate of about 186 wells per year over a period of 10 years, or until the resource base is fully developed. Of these additional wells, approximately 1,226 will be drilled in the proven production or "core" area and 635 in the remaining "flank" area. The anticipated life of each producing well is expected to be about 40 years.

The Operators anticipate drilling infill wells to the Frontier and

Dakota formations at varying densities ranging from 67 acres to 160 acres per aliquot section (4 to 10 additional wells/section) in the core area and 320 acres per well (2 additional wells/section) in the flank area. The proposed wells would be drilled during a 10-year period after project approval.

Approximately 75 percent of the new wells drilled south of the northern boundary of Township 20 North may produce ``commingled'' gas from both the Frontier and the Dakota formations via a common well bore. The use of commingled downholes generally limits overall surface disturbance by reducing the need to drill separate wells to distinct formations. The total number of wells drilled would depend largely on factors outside of the Operators' control, such as production success, engineering technology, economics, availability of commodity markets, and lease stipulations and restrictions.

Infrastructure required to support gas production would include electric power lines, roads, gas flow lines and pipelines, well pads, water injection and evaporation facilities, and gas treatment facilities. Gas would be transported through pipelines to centralized compression and treatment facilities. Additional compression may be required on transportation pipelines to transport produced gas. Limited well site compression may be necessary. Produced water would be trucked to approved evaporation pits or water injection wells.

Major issues at this time include potential impacts to: Air quality, semi-desert ecosystems and their dependent wildlife species (including antelope, sage grouse, and white-tailed prairie dog colonies and their associated species); vegetation, including noxious weeds; reclamation; and riparian habitat associated with the Black's Fork, Hams Fork, and Green River corridors. The EIS and its information may be used to amend the Kemmerer RMP. Alternatives identified at this time include the proposed action and the no action alternatives.

Alan L. Kesterke,  
Associate State Director.  
[FR Doc. 05-20198 Filed 10-6-05; 8:45 am]

BILLING CODE 4310-22-P

**APPENDIX B**  
**Public Scoping Notice**

# **MOXA ARCH AREA GAS DEVELOPMENT PROJECT SCOPING NOTICE**

## **1.0 INTRODUCTION**

Oil and gas companies operating in the area known as the Moxa Arch (identified herein as the “Operators”) have proposed to continue to drill additional development wells in their leased acreage within the Moxa Arch oil and gas development area (Project Area) in southwestern Wyoming. Oil and gas leases covering these lands were issued by the Bureau of Land Management (BLM) for the United States government, the State of Wyoming, and private owners. The leases (1) grant certain rights to explore, develop, and produce the oil and gas resources underlying such leases, (2) grant certain rights for reasonable ingress and egress to explore, develop, and operate such leases, and (3) retain in the lessor a royalty interest on production.

The Project Area includes approximately 476,300 acres of mixed federal, state, and private lands in Sweetwater, Lincoln, and Uinta counties. Approximately 230,400 acres (49%) are managed by the BLM, approximately 31,700 acres (6%) are managed by the USDI Bureau of Reclamation (BOR), 13,500 acres (2%) are managed by the State of Wyoming, and approximately 200,700 acres (43%) are privately owned. The Kemmerer Field Office (FO) manages BLM surface lands and the federal mineral estate within the Project Area. The Project Area is located within Townships 15 through 23 North, Ranges 111 through 113 West, 6<sup>th</sup> Principal Meridian. It lies in an area west of Green River, Wyoming, east of Lyman and Opal, Wyoming, and south of the Fontenelle Reservoir. It is bisected by Interstate 80 through its southern third.

## **2.0 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE**

### **2.1 ENVIRONMENTAL IMPACT STATEMENT (EIS) DEVELOPMENT**

The BLM has determined that permitting this proposed project constitutes a federal action that may affect the quality of the human environment. The BLM has advised the Operators that it must prepare a new or supplemental Environmental Impact Statement (EIS) to analyze the effects of their proposed development drilling in the Project Area. Pursuant to the National Environmental Policy Act (NEPA) and the Council on Environmental Quality regulations on implementing NEPA, the BLM will prepare a NEPA-compliant EIS that will describe and evaluate the potential impacts of the Operators’ Proposed Action and alternatives. The purpose of the EIS will be to provide the public and decision-makers with sufficient information to understand the environmental consequences of the Proposed Action and alternatives and to identify and develop appropriate mitigation measures to minimize environmental impacts. NEPA requires that a No Action alternative and any reasonable action alternative(s) be evaluated during the analysis process. In part, this scoping statement has been prepared to enable government agencies, the general public, and other interested parties to participate in and contribute to the alternative selection process.

## **2.2 RELATIONSHIP OF THE PROJECT TO EXISTING LAND USE PLANS**

The Project Area lies within BLM-administered public lands guided by the Kemmerer Resource Management Plan (RMP) (1986). Management objectives and actions applicable to the Proposed Action within the Kemmerer Resource Area are as follows:

- Oil and gas leasing will continue throughout the Kemmerer Resource Area. As oil and gas leases expire, or otherwise terminate, the areas will, in most cases, continue to be re-offered for lease.
- All public lands within the resource area have been reviewed as suitable for oil and gas leasing and development subject to certain stipulations. Resource management and protection stipulations will be developed and implemented on an “as needed” basis to prevent undue adverse impacts to other resources.

The proposed natural gas development and production project is in conformance with management objectives provided in the Kemmerer RMP.

The EIS will reference and incorporate NEPA documents that were previously developed for the Project Area, including the EIS for the *Expanded Moxa Arch Natural Gas Development Project*, June 1996 (1996 EIS). The Project Area includes all of the lands analyzed in the 1996 EIS and implemented through its Record of Decision in March 1997.

## **3.0 PURPOSE AND NEED**

The purpose of the proposed project is to exercise the Operators’ valid existing rights and extract natural gas from the subsurface to increase the available supply of natural gas by a daily delivery of gas by approximately 425 million cubic feet. The ultimate production volume is anticipated to be at least 1.8 trillion cubic feet.

Since the issuance of the Expanded Moxa Arch EIS, drilling activities have been conducted that have led to the development of about 1,400 producing gas wells as of February 2005. Because of the success rate of drilling activities conducted since the issuance of the 1997 Expanded Moxa Arch Area EIS, the Operators anticipate that infill drilling would facilitate the extraction of additional gas resources and extend production. The Operators propose to infill drill within the same approximately 476,300 acre project area analyzed in the Expanded Moxa Arch EIS. The Operators’ proposal to conduct infill drilling among the existing wells is based on the two zones, the core and the flank, described and illustrated in the Expanded Moxa Arch Natural Gas Development Project EIS and ROD (1997). Of the additional wells proposed by the Operators, approximately 1,226 will be drilled in the proven production or “core” area and 635 in the remaining “flank” area. The anticipated life of each producing well is expected to be about 40 years.

Implementation of the Proposed Action would:

- Contribute to available natural gas supply for the national market;
- Reduce national dependence on potentially unstable foreign sources of energy;

- Contribute to the national supply of a clean-burning fuel; and
- Allow the Operators to develop natural gas pursuant to their rights under valid existing oil and gas leases granted by the BLM, State of Wyoming, and private owners.

Gas production in the Project Area will result in the generation of federal and state royalty revenues. Developing the gas resource supports the local economy by providing and maintaining employment opportunities and expanding the tax base.

#### **4.0 PROPOSED ACTION**

The Operators estimate that approximately 1,861 new wells will be drilled in the Project Area as a result of implementing this proposal. They anticipate drilling infill wells to the Frontier and Dakota formations at varying densities ranging from 67 acres to 160 acres per section in the proven production area (“core area”) and 320 acres per well in the flank area. The core and flank areas were redefined from the areas considered in the 1996 EIS such that the core area has been reduced and the flank area has been expanded. The Operators estimate approximately 1,226 additional wells will be drilled in the core area and approximately 635 additional wells will be drilled in the flank area. The Project Area contains several federal units in addition to non-unitized lands. The total number of estimated projected wells includes those wells that will be drilled in units. The total number of wells drilled will depend largely on factors outside of the Operators’ control, such as production success, appropriate engineering technology, economic factors, commodity prices, availability of commodity markets, and lease stipulations and restrictions.

Approximately 75% of the new wells drilled south of the northern boundary of Township 20 North may produce gas from both the Frontier and the Dakota formations, commingled downhole per WOGCC Order 155-91. Production commingled in the same well bore will not result in additional surface disturbance because downhole commingling reduces the need to drill separate wells to distinct formations. The Frontier Formation is not producible north of that boundary. Although the Operators may decide to utilize alternative drilling and production techniques in order to reduce environmental impacts, this proposal assumes that the additional wells as described herein will be drilled conventionally, i.e., with vertical well bores.

All proposed wells are anticipated to be drilled during an approximate 10-year period after project approval. Although actual operations are subject to change as conditions warrant, the Operators’ long-term plan of development is to drill additional wells at the rate of approximately 186 wells per year or until the resource base is fully developed. The average anticipated life of a well is expected to be 40 years.

The associated facilities required by the Project will include roads, gas pipelines, and separation, dehydration, metering, and fluid storage facilities. Gas will be transported via subsurface pipeline to centralized compression and treatment facilities. Produced water will be transported by truck to produced water disposal wells or to commercially owned evaporation ponds or wells. Project development will result in the use of roads previously constructed and

currently used in the Project Area as well as the construction of new roads. New roads are expected to consist primarily of access roads, using existing arterial roads for main access to the Project Area.

As of February 10, 2005, the Moxa Project Area contained approximately 1,400 producing gas wells. The total number of existing wells includes all wells drilled on federal, state, and private surfaces. Dry and abandoned and plugged and abandoned wells are not considered producing wells and are not included in this total.

## **5.0 PRELIMINARY RESOURCE ISSUES FOR NEPA ANALYSIS**

The following resource issues have been identified as being related to the Proposed Action:

- Effects on biological resources including crucial big game winter range, sage grouse, pygmy rabbits, and other species of concern.
- Effects on livestock forage.
- Effects of development on air quality.
- Socio-Economic effects
- Effects on soils, water quality, and vegetative resources within the project area.
- Effects on archeology, paleontology, etc.
- Transportation
- Recreation

## **6.0 PUBLIC PARTICIPATION**

A critical element of the NEPA process is public scoping. Scoping activities are initiated early in the process to:

- Identify issues of concern related to the Proposed Action;
- Determine the depth of the analysis for issues addressed in the NEPA document; and
- Identify reasonable alternatives to be evaluated in the NEPA document.

The public is encouraged to participate during the scoping process to help identify the scope of the analysis needed, alternatives to the Proposed Action, other issues or concerns that should be analyzed, mitigation opportunities, and any other comments or ideas to help ensure the completeness of the analysis process. **Your written comments will be accepted on or before December 2, 2005.** Please submit your written comments to:

**Ms. Michele Easley, Planning and Environmental Coordinator**  
**Bureau of Land Management, Kemmerer Field Office**  
**312 Highway 189 North**  
**Kemmerer, WY 83101**  
[michele\\_easley@blm.gov](mailto:michele_easley@blm.gov)  
Telephone: (307) 828-4524  
Fax: (307) 828-4539

Public meetings to discuss the proposed project will be held at 6:00 PM for the following dates and locations. A brief presentation of the project and the NEPA process will begin at 6:30 PM each night.

Monday November 14, 2005  
Uinta County Public Library  
701 Main Street  
Evanston, Wyoming

November 15, 2005  
White Mountain Public Library  
2935 Sweetwater Drive  
Rock Springs, Wyoming

November 16, 2005  
Lyman Town Hall  
100 E Sage Street  
Lyman, Wyoming

November 17, 2005  
Lincoln County Public Library  
519 Emerald Street  
Kemmerer, Wyoming

**APPENDIX C**  
**Public Meeting Sign-In Sheet**

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**REGISTRATION**  
**U.S. Department of the Interior**  
**Bureau of Land Management**  
**Kemmerer Field Office, Kemmerer, Wyoming**



**Public Meeting for Moxa Arch Area Gas Development Project Scoping**  
**November 14-17, 2005**

Copies of this Registration will be available for public review at the local BLM office during regular business hours. **Individuals requesting that their name and address be withheld from public review** or from disclosure under the Freedom of Information Act **must check "YES" in the "Personal Information" column.** Such requests will be honored to the extent allowed by law.

Name, Mailing Address & Email Address <i>(Please Print Or Write Legibly)</i>	Do you want your personal information withheld?	Do you want a copy of the Moxa Arch Draft EIS?	What are your Public Land Interests?
	YES <input type="checkbox"/> NO <input type="checkbox"/>	Entire DEIS <input type="checkbox"/> Exec Sum <input type="checkbox"/> CD ROM <input type="checkbox"/>	<input type="checkbox"/> All <input type="checkbox"/> Realty <input type="checkbox"/> Grazing <input type="checkbox"/> Minerals <input type="checkbox"/> Recreation <input type="checkbox"/> Wildlife <input type="checkbox"/> Paleo/Cultural <input type="checkbox"/> Other _____
	YES <input type="checkbox"/> NO <input type="checkbox"/>	Entire DEIS <input type="checkbox"/> Exec Sum <input type="checkbox"/> CD ROM <input type="checkbox"/>	<input type="checkbox"/> All <input type="checkbox"/> Realty <input type="checkbox"/> Grazing <input type="checkbox"/> Minerals <input type="checkbox"/> Recreation <input type="checkbox"/> Wildlife <input type="checkbox"/> Paleo/Cultural <input type="checkbox"/> Other _____
	YES <input type="checkbox"/> NO <input type="checkbox"/>	Entire DEIS <input type="checkbox"/> Exec Sum <input type="checkbox"/> CD ROM <input type="checkbox"/>	<input type="checkbox"/> All <input type="checkbox"/> Realty <input type="checkbox"/> Grazing <input type="checkbox"/> Minerals <input type="checkbox"/> Recreation <input type="checkbox"/> Wildlife <input type="checkbox"/> Paleo/Cultural <input type="checkbox"/> Other _____
	YES <input type="checkbox"/> NO <input type="checkbox"/>	Entire DEIS <input type="checkbox"/> Exec Sum <input type="checkbox"/> CD ROM <input type="checkbox"/>	<input type="checkbox"/> All <input type="checkbox"/> Realty <input type="checkbox"/> Grazing <input type="checkbox"/> Minerals <input type="checkbox"/> Recreation <input type="checkbox"/> Wildlife <input type="checkbox"/> Paleo/Cultural <input type="checkbox"/> Other _____
	YES <input type="checkbox"/> NO <input type="checkbox"/>	Entire DEIS <input type="checkbox"/> Exec Sum <input type="checkbox"/> CD ROM <input type="checkbox"/>	<input type="checkbox"/> All <input type="checkbox"/> Realty <input type="checkbox"/> Grazing <input type="checkbox"/> Minerals <input type="checkbox"/> Recreation <input type="checkbox"/> Wildlife <input type="checkbox"/> Paleo/Cultural <input type="checkbox"/> Other _____
	YES <input type="checkbox"/> NO <input type="checkbox"/>	Entire DEIS <input type="checkbox"/> Exec Sum <input type="checkbox"/> CD ROM <input type="checkbox"/>	<input type="checkbox"/> All <input type="checkbox"/> Realty <input type="checkbox"/> Grazing <input type="checkbox"/> Minerals <input type="checkbox"/> Recreation <input type="checkbox"/> Wildlife <input type="checkbox"/> Paleo/Cultural <input type="checkbox"/> Other _____
	YES <input type="checkbox"/> NO <input type="checkbox"/>	Entire DEIS <input type="checkbox"/> Exec Sum <input type="checkbox"/> CD ROM <input type="checkbox"/>	<input type="checkbox"/> All <input type="checkbox"/> Realty <input type="checkbox"/> Grazing <input type="checkbox"/> Minerals <input type="checkbox"/> Recreation <input type="checkbox"/> Wildlife <input type="checkbox"/> Paleo/Cultural <input type="checkbox"/> Other _____

**APPENDIX D**  
**Substantive Scoping Comments**

# Substantive Comments

Comment Number	Comment Category	Organization	Comment Text
2	Ranching	Horseshoe Spear Ranch	I have begun to notice a larger increase of animals coming into the river valley ranch areas. This may be because of the disturbance in their native area, or because of the increased motorized traffic into their habitat, I don't know, but feel this question needs to be addressed. With the increased sizes of the big game animal herds coming into the "safe" harbor of the ranches, it has put an increased burden on the winter feed on our ranch.
11	Ranching	Horseshoe Spear Ranch	I feel there also needs to be a coordinated resource management team that oversees all reclamation on well sites, right of ways, pipelines, etc. to ensure that they are being adequately reclaimed, reseeded and brought back to an esthetic and useable area.
12	Ranching	Horseshoe Spear Ranch	The working well sites should be adequately protected by fences or other means to keep domestic and wild animals from wandering in and coming to harm.
15	Ranching	Individual	Following are some specific individual effects that we believe need to be analyzed in the EIS: road development; increased road traffic; widening of roads that leads to speeding vehicles, destroyed cattle guards and deaths of livestock; decreased AUMs and pastures for grazing; social and economic impacts on livestock operators; unsuccessful reclamation of disturbed areas; control of noxious weed invasions; and potential conflicts with livestock management operations, including impacts to range improvements. Each of these impacts increases costs and decreases revenues for grazing permittees. The accumulated impacts of this and nearby projects could jeopardize the continued existence of grazing operations in this area. The individual and cumulative impacts and the proposed remedies need to be identified and evaluated in the EIS.
175	Ranching	Individual	Our concern is how will the increased development and new pipelines affect the value of private property in this area. With the current pipelines crossing our property, we will not be able to subdivide our property, and may not be able to sell it, except for horse pasture. This greatly devalues the property. How does industry and the BLM plan on dealing with this dilemma?
124	Monitoring	Wyoming Outdoor Council	Monitoring to ensure reclamation is successful will be required. Reclamation will be initiated as soon as is possible and as much of the area disturbed by well drilling and operations will be reclaimed as is possible at the earliest possible time. Initiation of reclamation will not be postponed until when operations cease. Bonds will not be released until successful reclamation has been demonstrated.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
5	Transportation	Horseshoe Spear Ranch	We are dealing with a large amount of water trucks coming in and out of our ranch entrance going into the Nutria bridge area to load water for the well sites. Not only does this increase the danger of trying to get into and out of the ranch on the already over used highway system, they knock down the ranch traffic markers on a regular basis, making it un-safe to try and find the entrance at night, we also have to deal with the large ruts that the trucks leave behind, the constant stirring of the dust from the trucks etc.
13	Transportation	Horseshoe Spear Ranch	If you intend to increase the drilling and subsequent traffic that comes with it, I feel very strongly that you need to work with the State of Wyoming to put in adequate turn lanes and center turn lanes on this highway where there are established exits, such as ranches and county roads and to limit the number of turnoffs for ingress and egress from the gas fields, even if this means a service road running parallel with thie highway from which the gas roads go off from rather than multiple turnoffs from Highway 30. It would make more sense to upgrade the existing old highway from MM 80 towards Granger and make only two to three major turnouts from Highway 30 to access it.
41	Transportation	WYDOT, District Three	WYDOT, District Three, would like to be involved/participate in the transportation planning aspect of this project specific to access onto the state and federal highway system. We would like to make an effort to minimize new accesses and if possible combine/eliminate some existing accesses. A specific area that we have had discussions with BLM would be the US 30 corridor from Granger to Opal as an example.
161	Transportation	Wyoming Game and Fish Department	We recommend no new road crossings for the Green, Hams Fork or Blacks Fork Rivers. If a new road must cross one of the rivers, a bridge should be used to span the channel and riparian zone.
190	Economics	Director, Wyoming Department of Agriculture	The cumulative impacts of gas developments upon livestock grazing may jeopardize the livelihoods of grazing permittees. The loss or impaired ability of livestock grazing operations needs to be evaluated in the EIS. Throughout Wyoming, ranches are being replaced by housing and industrial developments, resulting in a permanent loss of wildlife habitat, scenic vistas, wide-open spaces, visual beauty, historic rural landscapes, stable rural revenues, and the historic cowboy culture of this state. However, these developments arrive with a significant increase in the cost of infrastructure imposed upon federal, state, and county officials to support those developments. A recent study in Fremont County conducted by the University of Wyoming shows that ranches bring significantly greater revenues into the county than the cost of the infrastructure needed to support those ranches. Conversely, the study also shows that developments demand greater costs in county infrastructure support and these increased costs far outweigh the revenues generated by developments. The study needs to be included in the EIS.
65	Economics	EOG Resources	Moreover, any such economic analysis should acknowledge that the ability to conduct economically successful operations varies among the Moxa operators and the final evaluation of economic viability is outside the BLM's purview.
62	Economics	EOG Resources	The economic effects analysis should include beneficial impacts to the revenues generated in association with oil and gas operations in Lincoln, Uinta, and Sweetwater counties in addition to benefits to the State of Wyoming.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
71	Economics	EOG Resources	To develop an EIS that accurately considers the economic and operational factors relating to the oil and gas development in the Moxa project area, the BLM must actively solicit data from the operators that are active in the project area.
66	Economics	EOG Resources	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.
64	Economics	EOG Resources	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 10-year project life.
63	Economics	EOG Resources	The EIS should analyze impacts to public services that depend upon tax revenues generated by oil and gas operations.
70	Economics	EOG Resources	As specified in Executive Order 13212, 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.
51	Economics	EOG Resources	An EIS alternative that considers 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 should be included in the EIS.
47	Economics	EOG Resources	The consideration of the use of alternative drilling technologies should include economic evaluations where economic feasibility is determined solely by the operator.
61	Economics	EOG Resources	The description of the affected environment should include a historical perspective of land use in the management area and how the development of oil and gas resources has facilitated economic growth.
7	Economics	Horseshoe Spear Ranch	We are very worried about what impact the increased oil and gas production in the area will have on private land values. We feel strongly that it could bring the property valuations down.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
21	Economics	Individual	The cumulative impacts of gas developments upon livestock grazing may jeopardize the livelihoods of grazing permittees. The loss or impaired ability of livestock grazing operations needs to be evaluated in the EIS.
40	Economics	Petroleum Association of Wyoming	A detailed analysis should be included in the environmental document addressing socio-economic impacts and the positive effects the project will have on the State of Wyoming and the Kemmerer area and surrounding communities. A section of the document should discuss the "local economy" significance criteria.
31	Economics	Public Lands Advocacy	In addition, we strongly urge BLM to address the positive results of increased development with respect to increasing natural gas supplies as well as the positive aspects of natural gas development on local and national economies. In addition to royalty payments shared with the state, we advise BLM to also include all state taxes in the analysis
53	Wildlife	EOG Resources	Management strategies for wildlife management and range management should be based upon sound science using data from the most recent studies conducted within the project area or from areas similar to that of the management area; i.e., areas within or near to southwestern Wyoming with checkerboard ownership.
1	Wildlife	Horseshoe Spear Ranch	As a rancher whose family has been here for well over 100 years, I have had long years of observation of the patterns of the native wildlife. I am very concerned about the increased human activity into the high mountain desert contained within the Moxa Arch Gas Area.
33	Wildlife	Natural Resources Policy Analyst, Governor's Planning Office	The scoping notice was vague on potential mitigation activities. At a minimum, wildlife habitat improvements--including offsite--and a commitment to flareless (green) completions should be included. At any point in time there must be adequate and functional habitat available such that it can absorb wildlife displaced from active project development areas.
155	Wildlife	Wyoming Game and Fish Department	If surface discharge is considered in the future we have concerns for increased salt loading within the Colorado River basin, and about altering the chemistry, suspended solids, and the water temperature and/or the natural hydrograph of the receiving drainage through the discharge of CBNG production water that could negatively impact the native fish assemblages in the receiving waters.
144	Wildlife	Wyoming Game and Fish Department	Disturbance of grouse while on their leks due to noise from compressor stations should be evaluated. Mitigation should include construction of compressor stations further away from the leks, unless appropriate noise control devices are used. We recommend that sage-grouse severe winter relief areas be mapped each winter as a part of the Wildlife Monitoring Plan.
136	Wildlife	Wyoming Game and Fish Department	Portions of this area are classified as crucial winter range for the Sublette antelope and Lincoln moose herds. The area is also classified as yearlong habitat for sage grouse and pygmy rabbits.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
142	Wildlife	Wyoming Game and Fish Department	We recommend no net loss of crucial ranges from the proposed actions. This is increasingly important in overlapping big game crucial winter ranges.
138	Wildlife	Wyoming Game and Fish Department	New roads into wells should be gated and monitored to reduce motorized access by the public. Our department can assist in siting roads that will minimize impacts on habitat and wildlife distribution.
143	Wildlife	Wyoming Game and Fish Department	Impact to certain sagebrush communities or habitats may take 30-50 years to return to pre-disturbance conditions. These temporal impacts should be disclosed and analyzed.
137	Wildlife	Wyoming Game and Fish Department	We strongly recommend directional drilling be used in this project area to minimize wildlife disturbance and decrease habitat fragmentation by concentrating facilities and roads.
145	Wildlife	Wyoming Game and Fish Department	We recommend including a cumulative analysis of the effects of sagebrush treatment in and adjacent to the area. Past sagebrush treatments, on BLM and private lands, should be included in the analysis for wildlife, since it does have an impact to species like grouse, songbirds, and big game.
146	Wildlife	Wyoming Game and Fish Department	The EIS should disclose habitat/vegetation loss by habitat/vegetation type and not by total area.
147	Wildlife	Wyoming Game and Fish Department	We recommend the BLM review and summarize the wildlife monitoring data that have been collected in this and adjacent gas fields to date, in order to put current information to best use... We would appreciate the opportunity to review these monitoring data with the BLM and industry, especially in regard to pronghorn and sage grouse, prior to document development.
149	Wildlife	Wyoming Game and Fish Department	The native fish assemblage in the Green River includes two species considered sensitive by both state and federal agencies. These species include flannelmouth suckers and bluehead suckers. The Department has categorized both the flannelmouth sucker and bluehead sucker as Status 1 Species... Therefore, the Department has been directed by the Wyoming Game and Fish Commission to recommend that no loss of habitat function occur.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
150	Wildlife	Wyoming Game and Fish Department	This project traverses both perennial and ephemeral drainages that enter the Green, Hams Fork and Blacks Fork Rivers. Any increase of sediment yield resulting from this project will negatively affect the survival of trout and salmon eggs (recruitment of brown trout and Kokanee salmon) and negatively affect the production of aquatic invertebrates that is the primary food source sustaining the sport and native fish communities in the Green River. In addition, increased sediment loading has the potential to change the hydrology and channel morphology of the receiving waters. This is of concern not only for the sport fisheries in the Green River but also the native fish communities in all three rivers.
153	Wildlife	Wyoming Game and Fish Department	Avoid road construction on steep slopes (slopes >8%), as road construction on steep slopes would exacerbate the alteration of hydrologic conditions that create and maintain key habitat features of sensitive species.
162	Wildlife	Wyoming Game and Fish Department	For perennial tributaries in the project area, design road crossings of streams to allow fish passage at all flows... Perched culverts block fish passage and are unacceptable in any stream that supports a fishery (WGFD 2004).
140	Wildlife	Wyoming Game and Fish Department	Because of the increased vehicle traffic and its impacts, and that it cannot be eliminated, we suggest initiating a pronghorn migration/habitat use study. Development will impact the winter range, and the results of that study can guide adaptive management in the future.
148	Wildlife	Wyoming Game and Fish Department	We strongly encourage the BLM and industry to develop and commit to a meaningful comprehensive wildlife mitigation plan, including onsite habitat treatments, funding for wildlife/habitat studies, and offsite habitat improvement projects.
88	Wildlife	Wyoming Outdoor Council	BLM must comply with Section 7 of the ESA in undertaking the Moxa Arch Project. This means that BLM must comply with its affirmative duty under Section 7(a)(1) to proactively implement programs for the conservation of listed species. Likewise it must meet the equally mandatory duty to ensure that the Moxa Arch Project does not jeopardize the continued existence of listed species or result in the destruction or adverse modification of their critical habitat.
101	Wildlife	Wyoming Outdoor Council	The Wyoming Game and Fish Department (WGFD) has issued its "Minimum Recommendations to Sustain Important Wildlife Habitats Affected by Oil and Gas Development," available at <a href="http://gf.state.wy.us/habitat/HotTopics/index.asp">http://gf.state.wy.us/habitat/HotTopics/index.asp</a> . We ask that BLM consider and in fact adopt the provisions of this report as binding provisions for oil and gas development in the Moxa Arch Project EIS and ROD... We specifically ask BLM to consider and in fact adopt provisions that will address this key finding of the WGFD report: the standard limitation on drilling on crucial winter ranges during the winter is insufficient standing alone to protect big game crucial ranges; the impacts of ongoing operations must also be mitigated.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
98	Wildlife	Wyoming Outdoor Council	It is also important to note that there are keystone resources that are critical for protecting a host of species. Springs or other water holes, deep pools in streams, and natural salt or mineral licks are examples. BLM should ensure that the decision document makes special provision for protecting keystone resources.
96	Wildlife	Wyoming Outdoor Council	The decision document must also ensure that other special habitats are protected and enhanced. Wintering areas, colonial or other concentrated avian nesting areas, spawning beds, and traditional birthing areas are examples of the special habitats the environmental analysis should consider and the decision document should protect these areas from seismic activities.
95	Wildlife	Wyoming Outdoor Council	Riparian areas must be given special consideration in the environmental analysis and protection in the decision document.
94	Wildlife	Wyoming Outdoor Council	Prior to authorizing the Moxa Arch Project, BLM must conduct a detailed and scientifically-credible analysis of its effects on ground and surface water flows (including depletions due to project water use) and quality (project-related sedimentation and siltation) and the corresponding impacts to Colorado River listed species.
93	Wildlife	Wyoming Outdoor Council	In developing the Moxa Arch Project environmental analysis, BLM should consider and utilize data available from the Wyoming Game and Fish Department to determine protections for game species (and other species)... We therefore request that protective measures be considered not just for "critical" winter ranges, but also for all winter range areas in the Moxa Arch Project area.
92	Wildlife	Wyoming Outdoor Council	Due to the sage grouse's status as a BLM sensitive species, BLM has heightened obligations to protect the species. Furthermore, the appropriate means to protect sage grouse is to not only focus management efforts (and protective measure) on particular habitat needs (e.g., protecting leks), but also to ensure sagebrush habitats, an increasingly imperiled ecosystem, are protected.
91	Wildlife	Wyoming Outdoor Council	Ferruginous Hawks and Other Raptors: The environmental analysis should determine whether these species are or could be using the Moxa Arch Project area and ensure that BLM meets its duties to provide management protections for these species that meets the requirements of the Sensitive Species Manual.
89	Wildlife	Wyoming Outdoor Council	It is critical that only credible and reputable scientists conduct the BA and other ESA-related analyses, and BLM must ensure that this is the case by establishing criteria for the quality of the BA and other ESA-related analyses.
99	Wildlife	Wyoming Outdoor Council	The environmental analysis must carefully evaluate problems resulting from habitat fragmentation and the need for maintaining the connectivity or linkage of habitats... We specifically request that BLM limit any further fragmentation of sagebrush communities, which are critical to many species and which is an increasingly imperiled ecosystem.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
87	Wildlife	Wyoming Outdoor Council	BLM must ensure its analysis of impacts to wildlife considers indirect, connected, related, long-term, and cumulative impacts in as quantitative, and scientifically supported, a manner as possible. BLM must also ensure that it fully complies with BLM Manual MS-6840 (Special Status Species Management).
86	Wildlife	Wyoming Outdoor Council	BLM cannot allow prohibited actions to occur until a decision document is finalized and endangered species act consultation is complete. No new project area disturbance should commence prior to completion of formal consultation under section 7 of the Endangered Species Act (ESA).
90	Wildlife	Wyoming Outdoor Council	Additionally, BLM must ensure that it fully complies with the requirements to engage in early consultation with the Fish and Wildlife Service relative to the effects of this action on listed species in this action area. In all likelihood this will require formal consultation relative to all listed species that may be present in the action area. Consultation should be completed and any biological opinion(s) issued by the Fish and Wildlife Service adopted by BLM and made a binding part of the decision document (and activities occurring under it) prior to approval of the Moxa Arch Project.
131	Wildlife	Wyoming Outdoor Council	All normal conditions or attributes of well approval, such as adherence to stipulations, adherence to various protections for wildlife (e.g., no drilling in crucial big game winter ranges from November 15 through April 15), acceptable 13 point surface use plans, provisions for adequate inspection and enforcement, etc. shall be part of this alternative and required as part of the conditions of approval.
97	Wildlife	Wyoming Outdoor Council	The environmental analysis should identify, and the decision document provide for the protection of, "keystone" species, which can be literally key to preventing undesirable, cascading ecological effects, such as widespread extinctions.
14	Recreation	Horseshoe Spear Ranch	With the added well sites, and the unfeasibility to shoot anywhere around the gas wells, has the public hunting been addressed fully?
139	Recreation	Wyoming Game and Fish Department	Hunting opportunity could decline after development, due to an increase in success caused by easier access throughout the area, which would be followed by a necessary decrease in hunting license sales.
50	Industry	EOG Resources	The EIS should acknowledge that the use of new technologies developed by Moxa operators to facilitate their operations might benefit other resources in the project area. New technologies could result in new BMPs. The EIS should develop a framework for incorporation of these new BMPs into project area operations as applicable on a site-specific basis.
55	Industry	EOG Resources	The BLM's use of environmental strategies (for resources other than minerals) that may be reconsidered and changed over the life of the project presents a moving target of goals and objectives that operators cannot meet while planning their drilling and production programs.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
57	Industry	EOG Resources	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 land management strategies.
30	Industry	Public Lands Advocacy	In conclusions, PLA appreciates BLM's emphasis in the Scoping Notice that operators in the area have valid existing lease rights that ensure their ability to access their leases and to conduct development activities accordingly. We urge the agency to limit new restrictions or operating standards to those that comport with valid existing rights.
135	Industry	Wyoming Outdoor Council	We are well aware of the problems that can be caused by poorly constructed roads and are not advocating that engineered roads never be required. However, roads engineered to the levels in the Gold Book and other guidance create their own environmental problems, including increased surface disturbance; potentially greater reclamation challenges; and an invitation to increased access which can create a range of environmental problems such as increased poaching, additional unauthorized creation of off-road-vehicle tracks, greater disturbance to wildlife, increased opportunities of weed establishment, etc. Thus, BLM should carefully determine what the appropriate level of engineering is for any road.
134	Industry	Wyoming Outdoor Council	With respect to element 1 of the proposed alternative (dealing with well spacing), a determination should be made as to what well spacing density in the vicinity of the proposed well is appropriate based on environmental and technical review, and BLM must consider whether to exercise its authority to require alternative well spacing
128	Industry	Wyoming Outdoor Council	Lighting, both during drilling and for ongoing operations, will be minimized to the maximum extent possible and legally permissible within BLM's authority, and the use of techniques to reduce the impacts of lighting (shading or redirection of light) shall be required to the maximum extent possible, again to the extent legally permissible within BLM's authority.
120	Industry	Wyoming Outdoor Council	All powerlines, pipelines and other facilities will be located on existing rights-of-way to the maximum extent possible and such infrastructure will be buried underground to the maximum extent possible, unless BLM determines that burying infrastructure would cause greater environmental impacts than above-ground infrastructure. In all cases, anti-perching devices and construction techniques will be required to the maximum extent possible for all above ground structures. BLM will fully comply with all policies and guidance regarding sage grouse conservation, such as that issued by BLM's national and state offices, and that issued by the Wyoming Game and Fish Department.
119	Industry	Wyoming Outdoor Council	Existing roads will be utilized for access to the well site to the maximum extent possible, and road construction will be minimized to the maximum extent possible. BLM will determine whether it is environmentally appropriate or desirable to require construction of any roads to the levels and specifications in guidance such as the "Gold Book."
56	NEPA	EOG Resources	The introduction of new information or data that fundamentally changes the environmental management strategies decided upon as a result of the EIS analysis 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.

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60	NEPA	EOG Resources	Resource management strategies should be based upon best currently available information, not on speculative, unproven ideas and concepts that may not result in the desired outcome.
59	NEPA	EOG Resources	Adaptive environmental management is not a viable management strategy unless it is defined as the incorporation of new operator-developed BMPs resulting from technological advances during the life of the project.
58	NEPA	EOG Resources	If, over the time frame of project implementation, professionally accepted, but unanticipated data, become available that fundamentally alter 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.
169	NEPA	Office of State Lands and Investments	We have no specific concerns regarding the proposed project at this early stage. As always, notwithstanding the federal NEPA process or federal approvals, the project proponents must comply with the Rules and Regulations adopted by the Board of Land Commissioners in accordance with W.S. 36-2-107 and W.S. 36-9-118, in the event that development occurs on, or it is necessary to traverse, state lands.
78	NEPA	Wyoming Outdoor Council	BLM should give specific attention to the purposes and needs for oil and gas related activities that will be analyzed. The relative value of the Moxa Arch Project area for meeting energy needs versus supplying environmental amenities/needs should be considered in identifying the purpose(s) and need(s) for this project. Similarly, identification of where specifically gas development is appropriate and inappropriate in the Moxa Arch Project area, and why, should be addressed in the environmental analysis as part of the definition of the purpose and need for the Moxa Arch Project.
79	NEPA	Wyoming Outdoor Council	BLM cannot define the purpose and need for the Moxa Arch Project as just to allow natural gas to be developed; it must also include strong environmental protections as at least a co-equal purpose and need.
133	NEPA	Wyoming Outdoor Council	In making a determination as to what best available technology will or will not be implemented, BLM shall document and make public in the EAs the basis for that determination. In any determination made by BLM relative to this alternative (e.g., whether directional drilling is feasible or not; whether an action will or will not cause unnecessary or undue degradation of the public lands, etc.), such determination will be documented by BLM and discussed in the EA. If BLM determines that any element of this alternative cannot be made a part of the alternative, all remaining elements of the alternative shall constitute the alternative for consideration in the EA.
115	NEPA	Wyoming Outdoor Council	Furthermore, by having previously committed to and recognized the need for additional future NEPA analysis, BLM itself has already provided the rebuttal to the presumption that a categorical exclusion may apply. Having already determined that additional future NEPA analysis will be required and will be undertaken, it would be arbitrary and capricious for BLM to claim no such analysis is now required, absent new NEPA analysis to support such a decision.

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114	NEPA	Wyoming Outdoor Council	A second issue of concern relates to the commitments in many existing NEPA documents to engage in site-specific NEPA analyses when APDs are filed since the existing NEPA document (usually an RMP and/or project level EIS) specifically declined to analyze site-specific impacts--in fact, often claiming such is impossible until a specific well is proposed--and very specifically committed to doing further NEPA analyses at the APD stage... This issue points out several limitations to the use of the categorical exclusion option allowed under Section 390 and IM 2005-247. First, it well established that statutes are not to be given retroactive effect unless Congress expressed a clear intent for such effect. Thus, the provisions in existing NEPA documents and DNAs still apply and are binding on BLM despite the provisions in Section 390 and IM 2005-24. Moreover, at least with respect to RMPs, BLM must still abide by the "consistency requirement" of section 302(a) of FLPMA and BLM's implementing regulations. As indicated, many RMPs commit BLM to future site specific NEPA and other analysis when APDs are filed. And last, where Records of Decision or Decision Records for project level oil and gas development activities (typically "full field" development activities) commit BLM to future site specific NEPA analyses, those commitments remain binding and enforceable.
111	NEPA	Wyoming Outdoor Council	The Energy Policy Act of 2005 contains several provisions that BLM should consider in the Moxa Arch Project EIS. Section 366 establishes time restriction on how quickly BLM must process APDs. BLM should state in the EIS how it will process APDs in light of this guidance... if BLM is going to attempt to take advantage of this opportunity to avoid NEPA at the APD stage, it must ensure there is adequate NEPA analysis in the Moxa Arch Project EIS.
113	NEPA	Wyoming Outdoor Council	Our first concern is that Section 390 (codified at 42 U.S.C. 15942) and the use of categorical exclusions that it provides for by its own terms applies "if the activity is conducted pursuant to the Mineral Leasing Act for the purpose of exploration or development of oil and gas." Thus, the provisions in Section 390 are specifically tied to continued compliance with the provisions of the Mineral Leasing Act... Even if BLM does not utilize NEPA as an aid to meeting these requirements because of categorically excluding an APD from NEPA compliance, these provisions of the Mineral Leasing Act still must be adhered to. We believe BLM will therefore still have to engage in the functional equivalent of NEPA analyses to meet these requirements when it pursues the Section 390 categorical exclusion option.
116	NEPA	Wyoming Outdoor Council	Last, with respect to NEPA documents that are in the process of being prepared, such as the revisions of existing RMPs and the Creston/Blue Gap II Natural Gas Development Project, if the categorical exclusion that is available under Section 390 is to be invoked for individual well drilling projects proposed in the future, the current NEPA analysis will have to be site-specific in nature in order for the categorical exclusion to be appropriately invoked.
29	BLM	Public Lands Advocacy	When determining what possible Best Management Practices (BMPs) or new operating requirements should be instituted for the area, we urge BLM to work closely with the operators... PLA recommends that BLM convene a working group to work on this project consisting of the operators, NEPA contractor, the agency and any other state or federal agencies involved in the process.
76	BLM	Wyoming Outdoor Council	Thus, in preparing the Moxa Arch Project environmental review, BLM should consider, analyze, and wherever appropriate facilitate, international efforts to prevent environmental decline.

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123	BLM	Wyoming Outdoor Council	The BLM will fully utilize its authority to ensure and require that bonding is sufficient to ensure reclamation and compliance with all lease terms, stipulations and conditions of approval before permitting the well. BLM will make determinations and increase bonds as needed to meet the requirements at 43 CFR 3104.5, and in particular will determine if the "total cost of plugging existing wells and reclaiming lands exceeds the present bond amount based on the estimates determined by the authorized officer."
170	Water	Director, WDEQ	The Department of Environmental Quality would like to see the NEPA analysis and resulting project address any potential effects to surface water quality that may occur as a result of existing or proposed construction practices in riparian areas. Special attention should be given to the proposed water handling and disposal methods. Each handling and disposal method may have different regulatory requirements. Also, every effort to prevent erosion of any kind should be taken. Any sediment created by the project can enter and affect the water quality of the receiving water.
67	Water	EOG Resources	Consideration of the release of produced water on the surface for beneficial use should be based upon a detailed technical and economic analysis that examines the constituents that typically characterize water produced from the Dakota and Frontier formations and possible removal and/or treatment options and associated costs
6	Water	Horseshoe Spear Ranch	Also as a water user, I am concerned with how much water, and what water right they are using to withdraw water from the river to service these wells. This is a regulated river with territorial water rights adjudicated on it and I would like to see this issue addressed. They are removing our stock and irrigation waters to transport to the gas field and this in turn effects the amount of water available for legal water right users.
151	Water	Wyoming Game and Fish Department	Furthermore, we are concerned with the increased risk of pollutants, resulting from project activities, entering the drainages (both perennial and ephemeral) and making their way into perennial drainages within or adjacent to the project area.
166	Water	Wyoming Game and Fish Department	Locate and construct all structures crossing intermittent and perennial streams such that they do not decrease channel stability or increase water velocity (WGFD 2004).
102	Water	Wyoming Outdoor Council	The decision document must ensure all components of State water quality standards are met, not just numeric standards. Specifically, seismic exploration activities, including especially blasting, cannot be allowed in or very near to streams, wetlands, and riparian areas.
103	Water	Wyoming Outdoor Council	To the extent waters within the BLM's jurisdiction have been identified as water quality impaired segments, or contribute stream flow to such segments, the Moxa Arch Project decision document should require affirmative steps toward reducing that impaired status, regardless of whether the State has made a specific allocation of pollutant load to BLM lands at the time the ROD is adopted.

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107	Cultural	Wyoming Outdoor Council	The Moxa Arch Project environmental analysis must ensure there is a sufficient inventory of cultural resources and their values prior to authorizing ground-disturbing activities and it should be used proactively by the BLM in its management in order to avoid resource Conflicts. Clearly BLM must fully comply with the need to consult with the State Historic Preservation Office prior to authorizing activities that may harm resources eligible for the National Register of Historic Places, and ensure full compliance with the National Historic Preservation Act.
108	Cultural	Wyoming Outdoor Council	Another concern is consultation with Native American tribes during the Moxa Arch Project environmental review process... The BLM must specifically request the views of tribal officials, and must solicit the views of traditional leaders or religious leaders.
109	Cultural	Wyoming Outdoor Council	The Moxa Arch Project environmental analysis document should identify areas where cultural sites are at risk, and the decision document should employ measures to protect these resources. The areas designated should be of sufficient size to allow viable protection of the resources; designation of just the site itself may not allow for effective management.
179	Weeds	Individual	There should be more cooperation between the BLM and private landowners considering mitigation and reclamation. New plant species should be considered that might establish faster to control erosion and compete better with the weedy and noxious plants. The native species over time will establish on their own and eventually take over. It is imperative that we stop erosion and the invasion of weeds ad halogeton.
178	Weeds	Individual	The impact and spread of noxious weeds and poisonous plants. Halogeton, very poisonous plants and cheatgrass are rapidly spreading through southwestern Wyo. It is a very noxious plant and could end up costing the sheep industry in SW Wyoming thousands of dollars in the future. It if keeps spreading it could effect other species of animals besides domestic sheep. We're losing species diversification.
172	Weeds	Western Wyoming Range Limited Partnership	We request the control of noxious weeds and especially halogeton be a major part of this analysis. We request that reseeded of native plant species be coordinated with the private landowners in the area. We request that mulching be a part of the reseeded effort and that "QuickGuard" be seeded as a cover crop, provided that it will not interfere with the establishment of the native species.
104	Weeds	Wyoming Outdoor Council	The environmental analysis should fully analyze the extent of the invasive species problem in this area, the causes, and options for both restoration and prevention in the future. As noted, it appears that several thousand separate disturbances will occur, each creating a potential entry point for invasive weeds into the Moxa Arch Project area. This unduly degrading and permanently impairing result cannot be allowed to occur.
125	Weeds	Wyoming Outdoor Council	Full compliance with Executive Order No. 13112 (dealing with invasive species) will be determined and required. Any trucks or other equipment used at the drill site will be required to have been cleaned to ensure weeds are not transported onto the site.

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9	Health and Human Safety	Horseshoe Spear Ranch	Also with the increase of migrant work force, there has been a large increase in the meth and drug problem in the area. This leads to petty theft off the remote ranches to take care of habits that were foreign to this area. Since a large portion of the drilling is on public lands, can there be mandatory drug testing and enforcement placed into the overall scoping policies for companies coming in to work the gas fields?
8	Health and Human Safety	Horseshoe Spear Ranch	With the increase of workers into the Moxa Arch area the private property owners have had an increase in incidents of illegal trespassing, illegal hunting, gas thefts of ranches, shop invasions and robberies, and the general "safe" feeling that we have always had is disappearing.
192	Policy	Director, Wyoming Department of Agriculture	Congressional mandates, federal statutes, and implementing regulations call for multiple use, and these mandates, statutes, and regulations should be an integral part of the assessments. Moreover, the impact of this project upon the goal of the Federal Land Policy and Management Act of 1976 to manage public lands in a manner that will provide food and habitat for fish, wildlife, and domestic animals needs to be evaluated.
188	Grazing	Director, Wyoming Department of Agriculture	Due to the grave impacts upon livestock grazing noted above, we strongly encourage the Moxa Arch operators and BLM officials to work with all affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding this project. On-site and off-site mitigation and the requirement for successful reclamation must be addressed in the EIS.
187	Grazing	Director, Wyoming Department of Agriculture	Any off-site mitigation resulting from this project will also have a direct impact on livestock grazing. Areas surrounding the project area have active grazing permits. It's important that compensation be similarly awarded to grazing permittees with offsite mitigation projects, as offsite mitigation will likely cause decreases in AUMs and losses of pastures.
186	Grazing	Director, Wyoming Department of Agriculture	Mitigation requirements that would enhance forage and habitat for livestock and wildlife in the planning area should be addressed in the EIS. Livestock permittees are currently aware of areas within their allotments that are underutilized by livestock. Addressing the potential for livestock to utilize these areas and implementing projects that would encourage this use should be actively supported. Project locations should consider both underutilization of forage and predicted impacts of development.
189	Grazing	Director, Wyoming Department of Agriculture	Moreover, it is imperative that BLM officials inform all livestock grazing permittees who are directly or indirectly affected by this proposal of the issues, decisions, and resulting actions regarding this proposal.
182	Grazing	Director, Wyoming Department of Agriculture	The energy development in this project area coupled with the developments on nearby BLM lands may seriously reduce Animal Unit Months (AUMs) and available pastures and cumulatively limit the ability of ranchers to graze their livestock.

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191	Grazing	Director, Wyoming Department of Agriculture	In addition to its economic value, grazing also represents irreplaceable environmental and social values, contributing to the preservation of open spaces, the 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 important 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.
180	Grazing	Director, Wyoming Department of Agriculture	The energy development in this project area coupled with the developments on nearby BLM lands may seriously reduce Animal Unit Months (AUMs) and available pastures and cumulatively limit the ability of ranchers to graze their livestock.
181	Grazing	Director, Wyoming Department of Agriculture	Following are some specific individual effects that we believe need to be analyzed in the EIS: road development; increased road traffic; widening of roads that leads to speeding vehicles; destroyed cattle guards; death of livestock; decreased AUMs and pastures for grazing; social and economic impacts on livestock operators; unsuccessful reclamation of disturbed areas; control of noxious weed invasions; and potential conflicts with livestock management operations, including impacts to range improvements. Each of these impacts increases costs and decreases revenues for grazing permittees. The accumulated impacts of this and nearby projects could jeopardize the continued existence of grazing operations in this area. The individual and cumulative impacts and the proposed remedies need to be identified and evaluated in the EIS.
183	Grazing	Director, Wyoming Department of Agriculture	Moreover, the checkerboard of private and BLM lands within the planning area increases the potential for conflicts with livestock grazing operations. The EIS needs to analyze specifically the consequences of this project within the checkerboard area.
185	Grazing	Director, Wyoming Department of Agriculture	We believe the Moxa Arch operators should conduct research and monitor the effects of their infill project on livestock grazing within the project area. We support compensatory mitigation discussions between gas operators and livestock permittees to lessen the burden, livestock stress, and economic impacts to grazing permittees from this development. Such mitigation strategies and costs could include, but not be limited to the following: movement of livestock to an open allotment or pasture; purchase of hay in lieu of allotment use; monitoring of development impacts, including use of the Wyoming Rangeland Monitoring Guide of August 2001; construction of water and range improvements on either public or private land; purchase of grazing land; and reimbursement to producers for loss of AUM and pasture losses.
3	Grazing	Horseshoe Spear Ranch	With the increase in drilling and the necessity of road access, collection areas, pipelines etc., I am very concerned with the impact on the AUMs that private ranchers lease from the BLM. How will the increased Oil and Gas activity affect the future of the exchange of use leases in this large checker boarded area that encompasses so much private/public/state lands?
16	Grazing	Individual	Moreover, because the checkerboard of private and BLM lands within the planning area increases the potential for conflicts with livestock grazing operations. The EIS needs to analyze specifically the consequences of this project within the checkerboard area.

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19	Grazing	Individual	Areas surrounding the project area have active grazing permits. It's important that compensation be similarly awarded to grazing permittees with offsite mitigation projects, as offsite mitigation will likely cause decreases in AUMs and losses of pastures.
20	Grazing	Individual	Because of the grave impacts upon livestock grazing noted above, we strongly encourage the Moxa Arch operators and BLM officials to work with all affected grazing permittees and agriculture producers to learn of their concerns and recommendations regarding this project... Moreover, it is imperative that BLM officials inform all livestock grazing permittees who are directly or indirectly affected by this proposal of the issues, decisions, and resulting actions regarding this proposal.
17	Grazing	Individual	We believe the Moxa Arch operators should conduct research and monitor the effects of their infill project on livestock grazing within the project area. We support compensatory mitigation discussions between gas operators and livestock permittees to lessen the burden, livestock stress, and economic impacts to grazing permittees from this development. Such mitigation strategies and costs could include, but not be limited to the following: movement of livestock to an open allotment or pasture; purchase of hay in lieu of allotment use; monitoring of development impacts, including use of the Wyoming Rangeland Monitoring Guide of August 2001; construction of water and range improvements on either public or private land; purchase of grazing land, and reimbursement to producers for loss of AUM and pasture losses.
177	Grazing	Individual	I have a great concern about the loss of habitat with more roads, pipelines and drill pads. We continually talk about mitigation for wildlife but the loss of habitat has a huge impact on domestic livestock grazing also. Perhaps some of this impact could be reduced with water develop(ment) and better and faster reclamation.
22	Grazing	Individual	In addition to its economic value, grazing also represents irreplaceable environmental and social values, contributing to the preservation of open spaces, the 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 important 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.
18	Grazing	Individual	Mitigation requirements that would enhance forage and habitat for livestock and wildlife in the planning area should be addressed in the EIS.
171	Grazing	Western Wyoming Range Limited Partnership	We are very concerned with all of this development and the affect it will have on the grazing of our livestock. We feel as a 57% landowner in the Carter Lease Allotment portion of the Moxa Arch Development Area, we should have more input than the general public. The decisions you make will impact our private lands because they lie in a checkerboard pattern with the intermingled federal lands, over which you have management jurisdiction. With over a 50% ownership interest, we should have a proportionate input into the surface disturbance issues and mitigation measures.

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173	Grazing	Western Wyoming Range Limited Partnership	We are concerned with the width of road and pipeline easements and size of the well site pads. We request these be coordinated with us as this project moves forward.
174	Grazing	Western Wyoming Range Limited Partnership	We are concerned that all the attention of earlier analyses and probably this one, were directed to wildlife mitigation. Livestock grazing is also an integral part of our local economies and where this allotment provides 5 to 6 months of forage for these livestock, it has to be recognized as critical to maintain the level of grazing available for these livestock.
184	Environmental quality	Director, Wyoming Department of Agriculture	Mitigation is needed and should be required. Both on-site and off-site mitigation should be considered. These mitigation requirements should be added to the EIS.
193	Environmental quality	Director, Wyoming Department of Agriculture	In fact, grazing is an essential resource management tool to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock. The EIS needs to include these positive effects of livestock grazing upon the environment and as a tool to achieve environmental objectives
156	Environmental quality	Wyoming Game and Fish Department	Hydrostatic test waters released during pipeline construction could cause alterations of stream channels, increased sediment loads, introduce potentially toxic chemicals and/or introduce aquatic nuisance species into drainages. Avoid discharging hydrostatic test waters directly into streams. Release these waters first into a temporary, sediment retention basin.
84	Environmental quality	Wyoming Outdoor Council	Since the definition of multiple use specifically provides that it is appropriate to not provide all resources in all areas, even within the Moxa Arch Project area the environmental analysis should identify areas where development is inappropriate and the decision document should prohibit drilling in these areas. For example, wetland and riparian areas should not be subject to the direct impact from exploration. Areas where the impacts of development would be visible for long periods or from long distances should be avoided.
85	Environmental quality	Wyoming Outdoor Council	It is also important to emphasize that under FLPMA the Moxa Arch Project environmental analysis and resulting decision document must consider and be based on the relative value of the resources involved. By this legally required measure, rare, unique, and sensitive native species have a relative value far in excess of more common or easily replaced public land resources, or resources that can be provided from other lands, such as oil and gas.
126	Environmental quality	Wyoming Outdoor Council	Ongoing operations will be conditioned such that the minimum amount of disturbance occurs. Remote monitoring of well operations and conditions will be required to the maximum extent possible. Oil and gas will be removed from the site by pipeline and not by truck to the maximum extent possible; if such is not possible, removal of petroleum products will be done by means that require the minimum possible amount of ongoing disturbance. Noise from ongoing operations will be minimized to the maximum extent possible.

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106	Environmental quality	Wyoming Outdoor Council	The environmental analysis and the decision document should address issues related to noise created by drilling and other activities. These impacts must be evaluated in terms of the remoteness and quietness that so many seek on the public lands.
105	Environmental quality	Wyoming Outdoor Council	The BLM should conduct surveys to determine the location and characteristics of native plant communities and rare or special status species. The survey results should be presented in the environmental analysis, and the decision document should establish standards for protecting native plant communities and rare or special status species.
83	Environmental quality	Wyoming Outdoor Council	To achieve a large built in margin of safety the environmental analysis and decision document should emphasize resource and ecosystem protection, which will best ensure that future options are retained. Furthermore, what is "best" must be determined with reference to the needs of the American people as a whole, not a small subset of the American people.
195	EIS	Director, Wyoming Department of Agriculture	Decisions in the proposed plan should allow BLM officials, grazing permittees, and company officials the opportunity throughout the life of this plan 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.
194	EIS	Director, Wyoming Department of Agriculture	Peer-reviewed science should underlie decisions and the EIS needs to identify the science that supports the decisions and discussions regarding this project.
44	EIS	EOG Resources	Alternatives should recognize that the mineral resource might not be developed if restrictions imposed upon minerals development are economically infeasible.
45	EIS	EOG Resources	Alternatives should not affect an operator's ability to access the minerals that it has leased.
46	EIS	EOG Resources	Potential takings should be limited by the careful development of alternatives that recognize that the technical methodology used by operators to develop the leased mineral resources cannot be mandated.
48	EIS	EOG Resources	The EIS should not include "phased development" as a component of fully analyzed alternatives.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
49	EIS	EOG Resources	An alternative that analyzes the application of "best management practices (BMPs)" should not prevent operators from accessing the surface above their leases and should not assume that the use of alternative technologies is technically and/or economically feasible.
52	EIS	EOG Resources	The EIS should utilize a "whole ecosystem" approach to analyzing the possible effects to wildlife and range by project development. This approach would acknowledge that a large portion of the project area consists of checkerboard land ownership and that land management strategies differ accordingly.
54	EIS	EOG Resources	The EIS must consider and should include data resulting from studies that demonstrate the beneficial effects of oil and gas development.
43	EIS	EOG Resources	The EIS should describe a detailed explanation of the rationale for the development of each alternative considered, including how the alternative satisfies the purpose and need for the Proposed Action.
42	EIS	EOG Resources	Alternatives developed for the Moxa EIS should provide clear-cut, distinct choices for implementation of the Proposed Action.
23	EIS	Individual	Congressional mandates, federal statutes, and implementing regulations call for multiple use, and these mandates, statutes and regulations should be an integral part of the assessments. Moreover, the impact of this project upon the goal of the Federal Land Policy and Management Act of 1976 to manage public lands in a manner that will provide food and habitat for fish, wildlife, and domestic animals needs to be evaluated.
32	EIS	Natural Resources Policy Analyst, Governor's Planning Office	Given that the referenced original EIS for the Expanded Moxa Arch Natural Gas Development Project was completed in June 1996, making it soon to be 10 years old, it is important for the new EIS to approach the analysis of this proposed action with a comprehensive and cumulative outlook.
37	EIS	Natural Resources Policy Analyst, Governor's Planning Office	To close, it is critical that as the Draft EIS is developed state and local agencies are fully involved as cooperating agencies to help formulate reasonable alternatives, and the public is allowed the maximum opportunity to comment on the Draft EIS.
39	EIS	Petroleum Association of Wyoming	The BLM and the project proponent should work together in the development of reasonable alternatives that will be evaluated in the environmental analysis.

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38	EIS	Petroleum Association of Wyoming	The cumulative analysis of this project in relation to existing development in this area has been significantly analyzed in previous documents. They should be utilized to the maximum extent possible in order to reduce the time and cost of preparing the EIS. The appropriate analysis from other documents should be incorporated and should not be duplicated in this EIS.
28	EIS	Public Lands Advocacy	The Project Area includes all of the lands analyzed in the 1996 EIS and implemented through its Record of Decision in March 1997. In this case, it would appear that many of the issues identified above have already been adequately analyzed in the previous documents... As such, new analysis may be limited to air quality concerns, livestock grazing, and potential impacts on wildlife from expanded development. We urge BLM to refrain from conducting redundant analyses in the interest of saving time and cost associated with the NEPA process.
74	EIS	Wyoming Outdoor Council	Similarly, the scope of the environmental analysis must include consideration of direct and indirect impacts of oil and gas development activities.
80	EIS	Wyoming Outdoor Council	BLM should take steps to gather needed information in all but the narrow range of exceptions permitted by the CEQ regulations. But if BLM concludes information is not essential to reasoned consideration of alternatives, or the cost of obtaining the information is exorbitant, or the means for acquiring the information are unknown, the BLM must nevertheless abide by CEQ guidance in this regard, namely that "credible scientific evidence" be presented relative to reasonably foreseeable significant adverse impacts (including low likelihood but catastrophic impacts) so that the impacts can be assessed based on approaches that are "generally accepted in the scientific community."
100	EIS	Wyoming Outdoor Council	At a minimum, BLM should require that lessees in the area go on the record as to what they anticipate will be future seismic exploration needs in the general vicinity of the Moxa Arch Project area, and analyze the potential impacts of such projects.
72	EIS	Wyoming Outdoor Council	The Moxa Arch Project environmental review must consider the actions occurring pursuant to the Green River, Pinedale, and Kemmerer Resource Management Plans (RMP) EISs and Records of Decision (ROD)... The scope of the EIS should include a detailed analysis of these similar actions so as to foster informed public participation in the Moxa Arch Project and informed decision-making by BLM.
81	EIS	Wyoming Outdoor Council	We specifically ask BLM to consider an alternative that would require development to occur from existing oil and gas well pads to the maximum extent that is technologically feasible, with maximum use being made of directional drilling technologies. Similarly, we ask BLM to consider an alternative that would not allow for additional road construction unless there is no other option available that would allow extraction of natural gas.
77	EIS	Wyoming Outdoor Council	The environmental analysis supporting the Moxa Arch Project should also explicitly address un-quantified environmental values and ensure they are given equal emphasis relative to economic analyses, and ensure up-to-date ecological information is utilized in developing the environmental analysis and decision document.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
75	EIS	Wyoming Outdoor Council	BLM must bear in mind that the "primary purpose" of an environmental review is to "insure that the policies and goals defined in [the National Environmental Polic Act--NEPA] are infused into the ongoing programs and actions of the Federal Government." 40CFR 1502.1...we ask BLM to "insure" that these goals and policies are "infused" into the Moxa Arch Project environmental review and decision document.
73	EIS	Wyoming Outdoor Council	Actions that should be addressed in a cumulative fashion include, but are not limited to: other oil and gas development activities, road construction activities, activities leading to soil and vegetation disturbance, activities leading to changed habitat structure, activities leading to habitat fragmentation, and activities causing air or water pollution.
82	EIS	Wyoming Outdoor Council	We urge BLM to require, in a direct and positive fashion, that development activities in the Moxa Arch Project area not cause unnecessary or undue degradation, and to ensure that this is the case.
163	BMPs	Wyoming Game and Fish Department	Drilling should not be permitted on slopes exceeding 25% (WGFD 2004).
164	BMPs	Wyoming Game and Fish Department	Design drill pad sites to drain excess storm water and other fluids into a properly sized reserve pit. The pit should have adequate capacity to intercept and hold excess precipitation.
165	BMPs	Wyoming Game and Fish Department	Staging, refueling, and storage areas should not be located in riparian zones or on flood plains. Keep all chemicals, solvents and fuels at least 500 feet away from streams and riparian areas (WGFD 2004).
168	BMPs	Wyoming Game and Fish Department	Chloride deicing agents are toxic to a variety of plants, fish and other aquatic organisms and tend to increase the mobility of chemical elements in soil, such as heavy metals. Use only non-chlorine deicing and dust control agents within the project area.
132	BMPs	Wyoming Outdoor Council	BLM will consider and adopt the Best Management Practices shown at <a href="http://www.blm.gov/nhp/300/wo310/O&amp;G/Ops/operations.html">http://www.blm.gov/nhp/300/wo310/O&amp;G/Ops/operations.html</a> to the maximum extent possible.

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121	BMPs	Wyoming Outdoor Council	"Closed loop" drilling fluid systems, with no reserve pit permitted, will be required to the maximum extent possible. Non-toxic drilling and fracing fluids will be required to the maximum extent possible. If fluids are generated or used during well drilling they will be disposed of off-site at a licensed facility, with the exception of produced water, which to the maximum extent possible will be disposed of by reinjection into the same formation from which the water was withdrawn, or into a formation that is as near as is possible to having the same characteristics as the source formation. Evaporation of drilling fluids and surface disposal of drilling residues following evaporation will not be allowed. During well drilling and the time any fluids remain in holding ponds the ponds will be covered with netting to prevent bird mortality. Any holding ponds necessary during drilling will be lined.
130	BMPs	Wyoming Outdoor Council	The surface use plan of operations shall require compliance with and incorporate by reference all applicable water pollution control requirements and permits of the Environmental Protection Agency and the State of Wyoming, including general permits for the control of stormwater discharges.
176	Surface disturbance	Individual	Are 12 wells/section necessary? Why can't offset wells be utilized from one pad?
34	Surface disturbance	Natural Resources Policy Analyst, Governor's Planning Office	Well densities this concentrated reach the "high impact" category for decreasing habitat function according to Wyoming Game and Fish management standards. The potential need for offsite mitigation should therefore be discussed with the operators early in the process to the extent the "core area" overlaps with designated crucial winter range, incorporating opportunities outlined in BLM's offsite mitigation IM 2005-069 dated February 2, 2005.
152	Surface disturbance	Wyoming Game and Fish Department	We recommend the operator directional drill from existing well sites as much as possible in an effort to reduce surface disturbance. Furthermore, travel plans should be developed to make the best possible use of existing roads thereby minimizing the need for new roads to reduce surface disturbance.
167	Surface disturbance	Wyoming Game and Fish Department	Avoid stripping riparian canopy or stream bank vegetation if possible. It is preferable to crush or shear streamside woody vegetation rather than completely remove it. Any locations, from which vegetation is stripped during installation of stream crossings, should be revegetated immediately after the crossing is completed (WGFD 2004).
141	Surface disturbance	Wyoming Game and Fish Department	Reclamation of disturbed sites is predicted to result in new grass-dominated habitats. This needs to be considered when cumulatively analyzing other habitat treatments targeting shrubs in the area (e.g., prescribed burns, chemical treatments).
154	Surface disturbance	Wyoming Game and Fish Department	No drilling or disturbance should be permitted within 500 feet of a riparian area, wetland or stream channel. Apply a standard NSO stipulation to all riparian zones and a 500-ft corridor extending from the outermost limit of the riparian habitat (WGFD 2004). We further suggest that wherever possible, directional drilling from existing well sites be used to access the gas reserves thereby limiting surface disturbance.

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
157	Surface disturbance	Wyoming Game and Fish Department	Any pipeline crossing of a perennial stream should be done by boring underneath the stream rather than trenching, especially the Green River, Hams Fork River and Blacks Fork River (WGFD 2004).
160	Surface disturbance	Wyoming Game and Fish Department	Use minimum practical width for rights-of-way where pipelines cross riparian areas and streams.
158	Surface disturbance	Wyoming Game and Fish Department	Pipeline crossings can be installed through ephemeral streams by trenching.
159	Surface disturbance	Wyoming Game and Fish Department	Locate pipelines that parallel drainages, outside the 100-year floodplain. Construct pipeline crossings at right angles to all riparian corridors and streams to minimize the area of disturbance (WGFD 2004).
112	Surface disturbance	Wyoming Outdoor Council	BLM must establish tracking to ensure total surface disturbance on a lease does not exceed 150 acres. Surface disturbance must be calculated based on initial disturbance not reclaimed surface disturbance unless BLM can provide data that shows reclamation has actually led to restoration and elimination of impacts.
118	Surface disturbance	Wyoming Outdoor Council	The proposed well will be drilled directionally from an existing well pad or similarly disturbed area. This element does not apply if BLM determines the distance from an existing well pad or similarly disturbed area exceeds that which can be drilled using the best available technology.
127	Surface disturbance	Wyoming Outdoor Council	The visual impacts of both well drilling and the completed well and its infrastructure will be minimized to the maximum extent possible. This will be achieved by, among other things, requiring the lowest profile structures possible, use of natural topography and terrain to the maximum extent possible to reduce visual impacts, avoidance to the maximum extent possible of terrain and topography where visual impacts would be extreme (such as ridgelines), and requirements to use appropriate coloration.
129	Surface disturbance	Wyoming Outdoor Council	The minimum possible well pad size will be determined, both for initial drilling and for ongoing operations, and this size pad will be required to the maximum extent possible, considering other relevant elements of this alternative, such as piping hydrocarbons away from the well site rather than trucking them away.
117	Surface disturbance	Wyoming Outdoor Council	Construction of the well will not exceed a well density that would cause unnecessary or undue degradation of the public lands when also considering the cumulative effect of all other existing sources of disturbance in the area; provided, however, that if such a density would be exceeded the well may be permitted if it can be drilled directionally from an existing well pad (see element 2).

<b>Comment Number</b>	<b>Comment Category</b>	<b>Organization</b>	<b>Comment Text</b>
26	Air quality	Air Quality Division Administrator, WDEQ	Emissions from drill rigs must be minimized by using Best Available Technology for the engines associated with all drilling operations.
25	Air quality	Air Quality Division Administrator, WDEQ	Requirements may need to be instituted in the Moxa Arch Area to conduct well completions or re-completions using best management practices (e.g., flareless completions) to reduce emissions of regulated pollutants associated with such activities to the extent practicable.
27	Air quality	Air Quality Division Administrator, WDEQ	The Moxa Arch operators should participate in the WDEQ led effort to develop a joint funding agreement with federal agencies and industry to finance and operate air quality monitoring in Southwest Wyoming.
24	Air quality	Air Quality Division Administrator, WDEQ	The emission control requirements and permitting process currently utilized under the Oil and Gas Production Facilities Chapter 6, Section 2 Permitting guidance may need to be revised to address the increased activity and emission levels.
69	Air quality	EOG Resources	Air quality modeling conducted for the Moxa project area should be based upon baseline air quality measurements taken from monitors not related to existing industrial sources, such as mines.
68	Air quality	EOG Resources	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 WDEQ's authority.
10	Air quality	Horseshoe Spear Ranch	We are very concerned about the possible degradation of the underground water sources and the depletion. Another issue I feel strongly about, if a potable good water source is tapped in the drilling area, it should be utilized and developed for use by wildlife and livestock in the area. Also the increased traffic patterns into the desert also mean an increase in road dust that can settle on the few open water sources available for wildlife and livestock. This needs to be addressed by possibly increased dust abatement measures on the roads.
4	Air quality	Horseshoe Spear Ranch	We have begun to notice an increase in the dust pollution and "smell" that sometimes covers the river valley. The stench sometimes is horrible when there is an inversion in the atmosphere. This may be coming from the well vents, local gas production plants or just from the increase in traffic, but it really becomes noticeable sometimes. At one point earlier this year, we alerted the Lincoln County Sheriff department because the odor was so toxic that we were worried about the health risks.

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35	Air quality	Natural Resources Policy Analyst, Governor's Planning Office	For the Air Quality Division to provide the necessary management oversight, the Moxa Arch EIS must incorporate analysis not previously completed within the Kemmerer Field Office and assess the need for additional air quality modeling and monitoring infrastructure. This analysis must include a current inventory, a cogent monitoring network, a plan for how the monitoring will be analyzed and a plan to modify management practices to adapt to changing circumstances.
36	Air quality	Natural Resources Policy Analyst, Governor's Planning Office	State agencies would like BLM to ensure that monitoring of all resources is adequately addressed in the EIS and ROD. Apart from increased monitoring, the preferred alternative must include scientifically proven practices that reduce impacts to air resources and viewsheds.
122	Air quality	Wyoming Outdoor Council	No flaring will be allowed except in emergency situations where necessary to protect health and safety. All dirt roads will have dust suppression actions required. Electric compressors or muffled clean-diesel or natural gas compressors will be required to the maximum extent possible. The best available control technology to regulate air pollutants will be required to the maximum extent possible for compressors, dehydrators, and other sources of air pollution. Car pooling to and from the well site will be required to the maximum extent possible, including at every scheduled crew change during drilling.
110	Air quality	Wyoming Outdoor Council	We ask that the BLM ensure that there is full compliance with the Clean Air Act... We ask that BLM consider the impact of its decisions on the ability of the State of Wyoming to develop an approvable State Implementation Plan pursuant to EPA's regional haze rule, which requires that States ensure improvement of visibility on the most impaired days and no degradation of visibility on the least impaired days. We also ask that BLM carefully consider the impact of this project on ozone concentrations and the applicable National Ambient Air Quality Standards.

**APPENDIX E**  
**Non-Substantive Scoping Comments**

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# Non-substantive Comments

<b>ID</b>	<b>Submittal Type</b>	<b>Organization</b>	<b>Nonsubstantive Notes</b>
46	Letter	Petroleum Association of Wyoming	PAW supports BLM's decision to prepare an EIS for this project.
57	E-mail	Individual	I oppose this project if it is given carte blanche by blm as all of the other project have been. It is quite clear that wyoming is being destroyed, lease by lease, by blm in its zeal to provide profiteers with whatever they ask for. Profiteers are never denied by this agency... Isn't it time that we protect our NATIONAL LANDS IN A BETTER FASHION????