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November 4, 2007

Ms. Michele Easley
Bureau of Land Management
Kemmerer Field Office
Kemmerer, Wyoming 83101

MOXA ARCH DRILLING PROJECT COMMENTS

Dear Ms Easley:

Thank you for giving me the opportunity to comment on the MOXA ARCH EIS. Unfortunately, I will be unable to attend any of the scheduled meetings.

I believe the BLM should approve the Operators' proposal (with added conditions discussed in the following paragraphs). Approval will double production with a minimal environmental impact. Increased production of energy is critical at this time on both economic and national security grounds.

Approval of Alternatives B and C at this time seems premature, but I commend their inclusion in the EIS. The language used makes clear that the BLM is willing to maximize production from the area under study. If future conditions warrant, similar Alternatives can be advanced prior to completion of the in-fill drilling program being sought by the Operators.

Two aspects of the in-fill drilling are not adequately addressed in the EIS. These are (1) Possible production from deeper horizons; and (2) Production from areas that might affect current and future trona mining activities. The BLM may wish to expand the EIS to consider these two issues. Approval of the Operators' request could be made with the proviso that a joint effort be made by the Operators and the BLM to address these prospects. The environmental foot print would be minimal.

Relatively few deep wells have been drilled on the MOXA ARCH, all at a time before the evolution of modern directional drilling and completion techniques. It is suggested that one site be selected in the core area to again test the Nugget Sandstone and the Morgan Formation, which are highly productive in the Over Thrust Belt. One possibility would be to redrill the BRUFF (1) site in Section 22 (SWSW) of T19NR112W. The well allegedly was highly productive for a short period, but some claim damage by antiquated fracturing techniques used on its attempted completion. A better site with fewer lease conflicts might be selected by the Operators in consultation with the BLM.

Current restrictions on drilling in the trona mining district presents more significant problems. The BLM and the Bureau of Mines will have to continue to take the initiative in determining the feasibility/desirability of attempting to extract trona and oil/gas at the same time. It is doubtful that this can safely be accomplished unless economic methods can be found to replace the current underground mining of trona. A great deal of imagination will be required. Since little trona is actually produced on the MOXA ARCH, this is a low priority item vis a vis the EIS. However, I suggest that the Operators be asked to pledge support for such an endeavor. Trona producers also could be asked to help.

The writer hopes the above specific comments are helpful. Readers, if any, probably should be made aware of the following:

The undersigned was born in Rock Springs, Wyoming, in 1928. He holds petroleum geology degrees from Stanford University (B.S. and M.S.). His family has been involved in livestock operations in the three counties for more than 100 years.

He is a shareholder in the Rock Springs Grazing Association, which enjoys surface ownership over part of the area. Other shareholders may not share his views.

He currently holds a small O.R.R.I. in a number of Federal oil/gas leases on the MOXA ARCH.

Finally, I know personally a number of decision making individuals in the oil/gas industry, together with Federal, State, County and local municipalities who are interested in MOXA ARCH matters.

I have not discussed this submission with any of the above but am willing to do so if desirable and appropriate

Sincerely,

Frank A. Mau

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