

Jim Magee Comments.txt

From: Crystal_Roberts@blm.gov
Sent: Thursday, January 10, 2008 10:44 AM
To: moxaeis
Subject: Fw: Moxa Arch DEIS Comments

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----- Forwarded by Crystal Roberts/KFO/WY/BLM/DOI on 01/10/2008 10:43 AM

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01/08/2008 07:13 AM

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To

cc

Subject

Moxa Arch DEIS Comments

Comments to Moxa Arch Area Infill Gas Development Project

Summary

My preference is Alternative A - no action/low development alternative. This would preserve the undeveloped portion of the area best, would limit the impact to all threatened, endangered and sensitive species, limits loss of habitat, limits use of the precious water resource and would have the least disturbance to wildlife. Preserving the habitat and wildlife is the most important issue to me. Also, the no action alternative matches the closest with the BLM's mission statement and also the majority of the public's determination to preserve the habitat and the wildlife and protect the environment. Too much pristine wildlife habitat is being fragmented, carved up

by unnecessary roads. We all need to be good stewards of the land and this is lacking in other areas where the BLM has allowed drilling and production operations with inadequate restrictions.

The below comments apply to this document:

Migration Routes need to be protected with no development allowed in the vicinity (within 1 mile) of a migration route.

Sagebrush - plants provide stability of the land, estimates are that it takes around 100 years to re-establish sagebrush. No destruction of healthy sage brush needs to be a requirement. This does not just apply to this area, it applies to everywhere in the western USA.

Mitigation Plans for species that will be impacted needs to start prior to any further development. A mitigation plan needs to be developed before issuing the final EIS for the project, if alternatives 1, 3 or 4 are selected.

Jim Magee Comments.txt

The statement "disturbances to these habitat types could be higher than reported because much of the current reclamation is not complying with the standards as part of the 1997 ROD" is very disturbing and this issue needs to be addressed in the final EIS.

Critical and Crucial habitat needs to be protected. Development is not to be allowed in areas determined to be critical or crucial habitat. The method in which the industry is operating in areas of crucial wildlife habitat has to change.

Sage Grouse - no development within 0.25 mile of Leks needs to be increased to no development or road within 1 mile of Leks. Also all of the exceptions listed need to be eliminated. The EIS needs to address more specifically how the project won't contribute to the listing of this species under the ESA taking into account a recent decision by a U.S. District judge that the U.S. Fish and Wildlife Service failed to use the best science available when denying federal protection of this species. The method in which the industry is operating in areas of crucial sage grouse habitat has to change in order to protect the species.

Pygmy Rabbit - The EIS needs to address more specifically how the project won't contribute to the listing of this species under the ESA.

Dust Control - needs to be a requirement under the EIS.

Air Pollution - every technology available should be used to minimize pollutants entering the atmosphere.

Roads - 1047 miles of roads existing in this project area is excessive, no new road construction should be allowed. New road construction would further fragment the area.

Appendix B - Comments

3.0 - Drilling and Development Operations should not be allowed during winter months (Nov 1 - May 1) where it would disturb wildlife or move wildlife off winter ranges. Also no drilling and no roads are to be allowed on or near any habitat identified as critical.

3.5 - Well Pads - A standard practice of lining all pits is recommended to avoid contamination to the ground water. Even though under Drilling Operations the statement is made that "no hazardous substances will be placed in the reserve pit", various chemicals used in the mud and completion fluid system will end up in the reserve pits that could contaminate the ground water. Also various other chemicals and oils end up in reserve pits by contractors and operators acting improperly. Lining all pits is prudent and will keep contamination of soils and ground water from occurring.

Well Pads - Reduce the well pad size to limit the footprint of the disturbance. Various methods that the BLM should be aware of can be used to reduce the size of the well pad.

3.6 - Roads - Add to objectives: Routing and construction of roads to minimize (if possible eliminate) sagebrush removal and damage to sagebrush.

3.7 - Drilling Operations: For numerous reasons the BLM should be aware of, obtaining water from any river or stream (mentioned are the Blacks Fork, Hams Fork and Green Rivers) should not be allowed. No surface disturbance should occur within any watershed.

Jim Magee Comments.txt

4.0 - Completion Operations and Testing:

Flaring hydrocarbons, when performed, should ensure a clean burn. "Green" Burners (air assist) are available allowing for a clean burn. Methods to minimize harmful emissions should always be used.

9.0 - Produced water disposal - in general surface evaporation pits should not

be allowed and this should be the last option to dispose of produced water. Any evaporation pits need to be lined for obvious reasons and any such pits require adequate fencing.

12.0 Hazardous material and wastes:

Drilling operations require lubricants, greases, oils, diesel fuel and sometimes even solvents and paints. The statement "Hazardous materials will not be stored at well locations during drilling operations" is a false statement.

Thanks for considering my comments,

Jim Magee
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