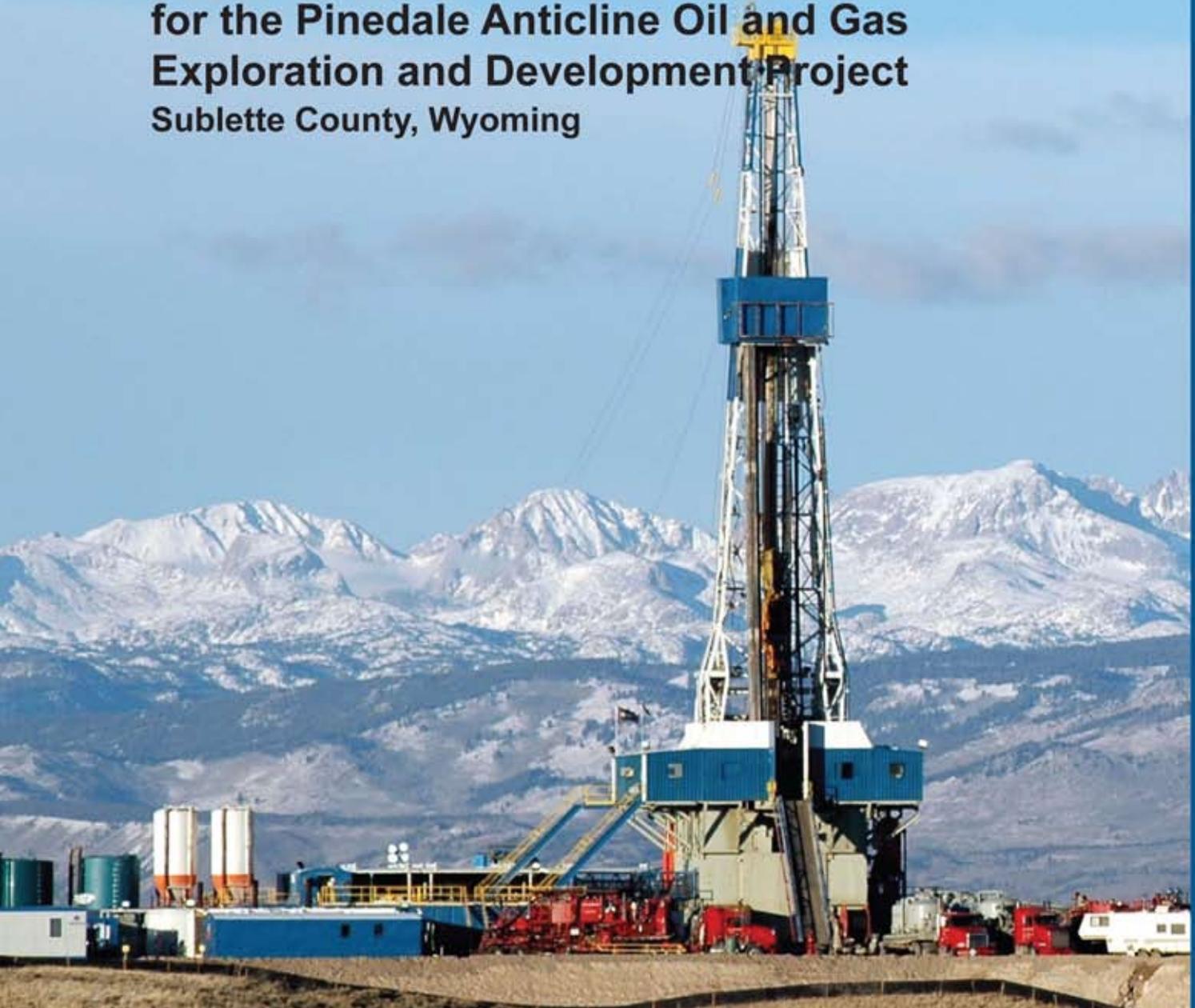


FINAL
Supplemental Environmental Impact Statement
for the Pinedale Anticline Oil and Gas
Exploration and Development Project
Sublette County, Wyoming



Draft SEIS Comment Summary

June 2008



MISSION STATEMENT

It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

**FINAL
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
PINEDALE ANTICLINE OIL AND GAS EXPLORATION AND DEVELOPMENT PROJECT
SUBLETTE COUNTY, WYOMING**

Draft SEIS Comment Summary

**Bureau of Land Management
Wyoming State Office
Cheyenne, Wyoming**

**Pinedale Field Office
Pinedale, Wyoming**

In Cooperation with

**State of Wyoming
Sublette County
Sublette County Conservation District**

June 2008

1. Draft SEIS Comment Analysis Process

1.1 INTRODUCTION

In December 2006, the Bureau of Land Management (BLM), Pinedale Field Office released a Draft Supplemental Environmental Impact Statement (Draft SEIS) and Air Quality Impact Analysis Technical Support Document (AQTSD) for the proposed long-term development of natural gas resources in the Pinedale Anticline Project Area (PAPA). On December 15, 2006 a Notice of Availability (NOA) for public review and comment on the Draft SEIS was published in the Federal Register (Volume 71, No. 241, pp. 75576-75578). The Draft SEIS was distributed in both paper and electronic formats (on CD-ROM), and was available for downloading from the BLM's website at www.wy.blm.gov/nepa/pfodocs/anticline/seis. A limited number of AQTSDs were distributed and made available upon request. Additional copies of these volumes were made available at the BLM Wyoming State Office and the BLM Pinedale Field Office.

As indicated in the December 15, 2006 NOA, the public was given 60 days to comment on the Draft SEIS however, it was also noted that a Supplemental Ozone Analysis would be published and upon its release the public would be given a minimum of 45 days to review and comment on the ozone report.

The Supplemental Ozone Analysis was published on February 21, 2007. The 45-day public comment period for the Supplemental Ozone Analysis extended the comment period for the Draft SEIS to April 6, 2007.

1.2 THE PUBLIC COMMENT PROCESS UNDER NEPA

Solicitation of public comment on draft plans for major federal actions is required under the National Environmental Policy Act (NEPA). Specifically, the BLM must "assess and consider comments both individually and collectively" (Title 40 Code of Federal Regulations (CFR) 1503.4). Comments received on the Draft SEIS are viewed as critical to helping the BLM modify or clarify, as necessary the existing alternatives and the preferred alternative to best suit the purpose and need for the project in light of public, proponents, and cooperating agency input; to potentially develop and evaluate new alternatives, to supplement, improve, or modify the existing environmental analyses, and to correct factual errors in the Draft SEIS.

1.3 OVERVIEW OF COMMENTS RECEIVED

During the 60-day comment period for the Draft SEIS, the BLM received more than 63,300 individual comment letters. Comments were received from federal, state, and local agencies; environmental advocacy groups; land and lease holders; local businesses; oil and gas companies; and the public. Letters were submitted in hard copy and electronic form. Over 37,000 individual emails were received. Electronic submittals included CD-ROMs and emails with attachments containing multiple form letters. BLM also received a petition from an environmental advocacy group with 2,478 signatures.

Although the comment period ended in April, the BLM received over 300 additional comment letters from individuals through November 2007. These letters are included in this analysis.

1.4 PROCESS FOR TRACKING AND ANALYZING PUBLIC COMMENTS

Comments on the Draft SEIS were first divided into groups by commenter type, federal, state or local agency; business and industry; environmental advocacy groups; and individuals. Business and industry letters and letters from individuals were further divided into two subgroups, unique letters and form letters. BLM analyzed each letter and email to identify potentially substantive comments. Within each commenter group the letters and emails containing substantive comments requiring a response from BLM were given an identifying number (e.g. federal agency letter 1 is coded FA-1). Letters and emails containing general comments were logged but not assigned an identifying number. Comment letters containing predominately form letter language were divided into ten unique form letter subgroups.

As noted above, BLM received more than 63,300 comment letters of which approximately 62,200 were form letters. A total of 1,392 letters were identified as unique. Of these unique comment letters, the BLM found that 141 letters (approximately 10%) contained substantive comments requiring a response from the agency.

1.4.1 Content Analysis Annotation

The Content Analysis process was used to identify substantial comments and assertions that may require a response from BLM. Substantial comments and assertions are identified electronically on the original correspondence, along with their unique identifier by highlighting individual comments. The letter/email identifier, comment number and assertion number are annotated in the left hand margin of the correspondence. Letters and emails may contain comments similar to other letters. In these cases BLM may refer to a previous response.

1.5 KEY ISSUES

Comments received by the BLM during scoping for the Pinedale Anticline SEIS, during the public review of the Draft SEIS, and at the February 13, 2007 public meeting provided a mechanism for identifying key issues regarding the proposed project. The following sections provide a brief summary of each issue.

1.5.1 Adaptive Management

Comments on the Draft SEIS raised concerns about the implementation of an Adaptive Management program included in the 2000 Record of Decision (ROD).

1.5.2 Aquatic Habitat

Comments on the Draft SEIS raised concerns about degradation of habitat for aquatic life and recommend all reasonable measures be taken not to harm local populations of fish and other aquatics.

1.5.3 Air Quality

Comments received on the Draft SEIS raised numerous air quality concerns. Potential high ozone levels were identified as an issue. Questions were raised about the accuracy of the modeling and the methods used. Recommendations include comprehensive air quality monitoring, thresholds that would trigger immediate reduction in the pace of development, mitigation requirements, requiring the use of best available control technologies, and EPA oversight. Other comments express concern about visibility in the nearby Bridger Wilderness Class I area being adversely affected by development of the PAPA.

1.5.4 Alternatives

Comments raised concern regarding the range of reasonable alternatives offered in the Draft SEIS.

1.5.5 Cultural

Comments expressed concern for missing scoping comments related to cultural and historic resources in the Draft SEIS. Others commented on protections for the historic Lander Trail.

1.5.6 Cumulative Impacts

Comments on the Draft SEIS include general statements about the need for quantitative data and additional detail in the discussion of cumulative impacts.

1.5.7 Grazing Resources

Comments detail the importance of addressing concerns of the livestock permittees, specifically mitigation projects.

1.5.8 Groundwater

Comments identified several issues related to groundwater including impacts to groundwater due to deep well injection, better understanding of the aquifer system hydrogeology, monitoring of wells, recharge rates and surface and groundwater interactions.

1.5.9 Hazardous Materials

Comment expressed concern that the Draft SEIS does not adequately address impacts from hazardous material releases.

1.5.10 Leasing

Comments detailed the desire to prohibit oil and gas leasing and development in environmentally sensitive areas, big game migration corridors, winter range, sage grouse nesting habitat and Green and New Fork river corridors. Recommendations include areas to be identified as withheld from leasing and restricting development to the core area until it is complete and reclaimed.

1.5.11 Mitigation

Comments requested specifics related to mitigation programs, enforcement of mitigation, off-site mitigation and mitigation thresholds. Recommendations include mitigation measures for grazing resources, air quality, and socioeconomics impacts to be included in the ROD.

1.5.12 Monitoring

Comments indicate the need for monitoring, inspection and enforcement of mitigation practices to determine if they are effective.

1.5.13 Noise

Comments raised concern about noise impacts and how they would be mitigated.

1.5.14 Paleontological Impacts

Comment raised about mitigation measures designed to protect paleontological resources.

1.5.15 Proposed Action/Preferred Alternative

Comments identified clarifications needed related to Core Area development, location of delineation wells, drilling and pad construction, drilling fluids, produced water, and DA-5.

1.5.16 Performance Based Objectives

Comments detail specific language needed to clarify the performance based objectives including monitoring timeframes, funding and consequences and action triggers should an objective fail to be met. Additionally, comments question how BLM would document the progress and report it to stakeholders.

1.5.17 Public Health

Comments expressed concern about the public health problems linked to emissions and water quality.

1.5.18 Recreation

Comments raise concern about hunting and fishing impacts, a decrease in heritage tourism, and would like the BLM to address impacts to roadless lands, potential ACEC's and potential Wild, Scenic or Recreational River corridors.

1.5.19 Reclamation

Comments address issues related to successful restoration of sagebrush habitat, livestock grazing land, wildlife areas, and pipeline corridors; defining reclamation standards and monitoring techniques. Additionally, comments detail specific changes to language in the text including seed mix recommendations and details about reclamation procedures.

1.5.20 Soils

Comments received recommend aligning the pipeline corridor with existing roads to protect sensitive soils.

1.5.21 Socioeconomic

Comments identified the need for revisions and additional socioeconomic analysis. Specific comments related to impacts on housing availability, health care, population statistics, infrastructure needs, impacts to schools, law enforcement and emergency management as well as the impacts to the quality of life. Comments also request discussion of the various benefits of year-round development including stable work force, strong economy, and safety.

1.5.22 Surface Water

Comments address the need for the analysis to address any potential effects to surface water quality including details about monitoring, handling of produced water, erosion, evaporative losses and salt concentrations in ponds. Recommendations include requiring best management practices.

1.5.23 Transportation

Comments on the Draft SEIS raised concerns about the substantial increase in truck traffic in and around the development and concerns for safety. Recommendations include the need for traffic planning, the development of alternate routes for industrial traffic, seasonal road closures, a discussion of the impacts to municipal roads and streets in Pinedale, a discussion about the life-of-project and the role of the liquid gathering system would have in traffic reduction.

1.5.24 Threatened, Endangered and Sensitive Species

Comments on the Draft SEIS expressed concerns that long-term habitat loss might contribute to declines in threatened, endangered and sensitive wildlife and plant species. Further issues were raised regarding the adequacy of BLM mitigation measures for these species, including the 0.25 mile disturbance buffer around sage-grouse leks and effects to greater sage-grouse nesting habitat. Other issues include water withdrawal plans, degradation of water and sediment loads impacting Colorado River fishes, conducting ferret surveys, impacts of winter drilling on bald eagles and raptors.

1.5.25 Vegetation

Comments address the need for plant surveys and details regarding monitoring of revegetation efforts.

1.5.26 Visual

Comments expressed the need to protect the view areas of Pinedale and the immediate environs. Comments also raise concern about how the BLM is applying the VRM classification guidelines in the project area.

1.5.27 Wildlife

Wildlife-related issues for big game include protecting and maintaining crucial winter range and identifying and maintaining migration corridors. Sage Grouse concerns include identifying and protecting critical winter habitat and nesting/brood-rearing habitats. Additional concerns about the potential listing the sage grouse as endangered were discussed. Comments also discuss inadequate mitigation, disturbance reducing habitat quality and populations, monitoring requirements, and off-site mitigation.

1.5.28 Wetlands

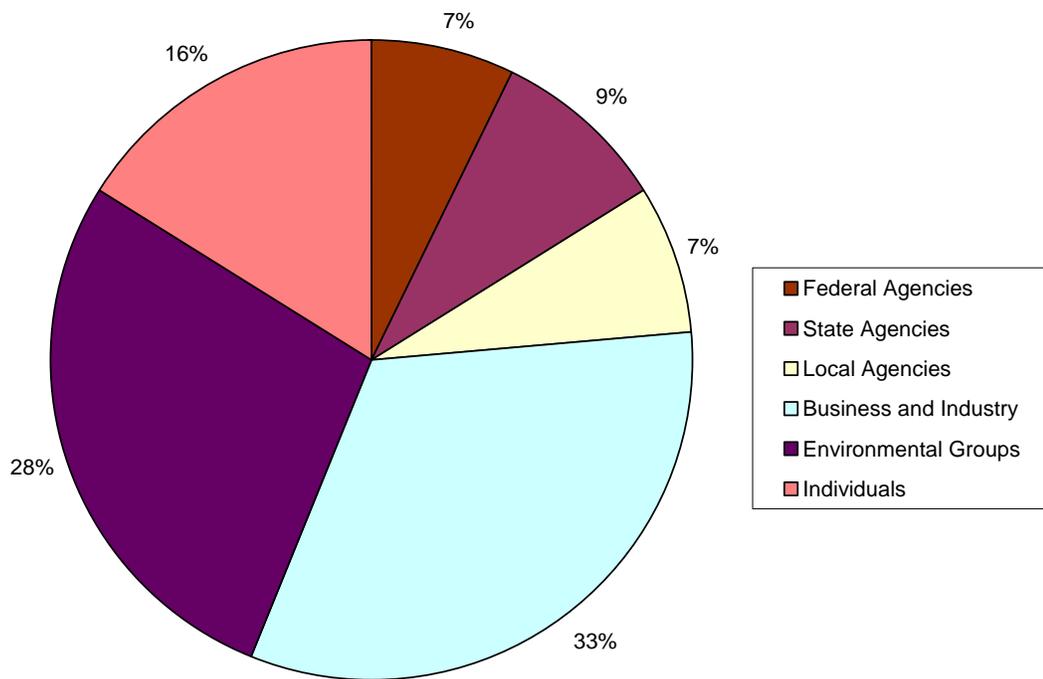
Comments on the Draft SEIS recommend the Final SEIS provide more information regarding the type and total acreage of wetlands impacted within the PAPA for the life of the project as well as an analysis of the wetland and riparian areas outside the PAPA that may be impacted by the project. Additionally, the Final SEIS should identify approximately how many acres of wetlands were affected prior to 2000.

1.6 ANALYSIS OF COMMENTS

1.6.1 Distribution of Commenter with Substantive Comments

Figure 1 shows the distribution of substantive comments by affiliation. A total of 1,531 substantive comments were addressed. All of the Cooperating Agencies submitted comments on the Draft SEIS. The Proponents, oil and gas industry interest groups, and environmental advocacy groups submitted over 50% of the substantive comments on the Draft SEIS.

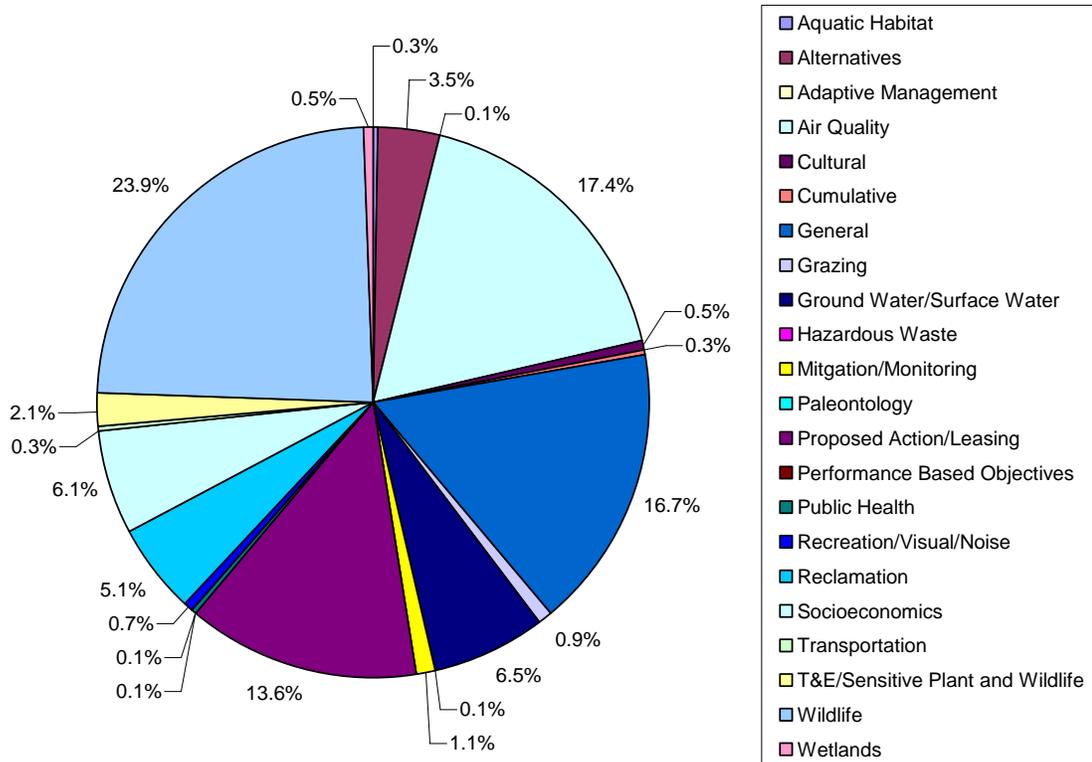
Figure 1 - Distribution of Substantive Comments by Affiliation



1.6.2 Substantive Comments by Key Issue

BLM organized the substantive comments into categories based on the key issues addressed in the comment. Figure 2 shows a breakdown of substantive comments by key issues. The three key issues most frequently addressed in the substantive comments (besides the general category) were wildlife, air quality, and the Proposed Action.

Figure 2 - Distribution of Comments by Key Issue



1.7 COMMENT ORGANIZATION ON CD

Letters and email with substantive comments and BLM responses are provided electronically. Comments are divided into five categories (folders); federal, state, and local agencies, business and industry, environmental advocacy groups, individuals, and form letters. Each folder contains a Comments and Responses document and the corresponding letters.

For this Final SEIS submittal, only letters with substantive comments are included on the CD. A complete set of comment letters received including the general unique comments not requiring a response from BLM can be found at the BLM Pinedale Field Office.

1.7.1 Log of Letters with Substantive Comments

Unique Identifying Number	Date Received	Agency, Organization, or Individual
FA-1	4/6/2007	U.S. Environmental Protection Agency, Region 8
FA-2	4/18/2007	U.S. Department of Agriculture, Forest Service
FA-3	4/6/2007	U.S. Department of Interior, Fish and Wildlife Service
FA-4	3/19/2007	U.S. Department of Interior, National Park Service
FA-5	3/6/2007	U.S. Department of Interior, National Park Service
SA-1	4/9/2007	Dave Freudenthal, Governor State of Wyoming
SA-2	4/6/2007	Wyoming Game and Fish Department
SA-3	4/4/2007	State of Wyoming, Department of Environmental Quality
SA-4	4/4/2007	State of Wyoming, Department of Environmental Quality
SA-5	4/2/2007	State of Wyoming, Department of Agriculture
SA-6	3/27/2007	Stan Cooper, Senator State of Wyoming
SA-7	4/6/2007	Elaine D. Harvey, Representative State of Wyoming
SA-8	4/10/2007	Monte Olsen, Representative State of Wyoming
SA-9	4/8/2007	Greg Curtis, Speaker of the House State of Utah
SA-10	4/6/2007	Mark Madsen, Senator State of Utah
SA-11	4/5/2007	Patrick Painter, Representative State of Utah
SA-12	4/6/2007	Carlene M. Walker, Senator State of Utah
SA-13	4/6/2007	Drew Perkins, Senator State of Wyoming
SA-14	4/4/2007	Jayne Mockler, Senator State of Wyoming
LA-1	4/6/2007	Sublette County Board of County Commissioners
LA-2	4/6/2007	Sublette County Sheriff's Office
LA-3	4/6/2007	Sublette County EMS Council
LA-4	1/16/2007	Sweetwater Economic Development Association
LA-5	3/7/2007	Teton County Board of Commissioners
LA-6	4/6/2007	Town of Pinedale
LA-7	4/6/2007	Sublette County Board of Commissioners
BI-1	4/6/2007	Joint Letter – Ultra Resources, Shell Exploration and Production Company and

		Questar Market Resources
BI-2	4/3/2007	Joint Letter – Ultra Resources, Shell Exploration and Production Company and Questar Market Resources
BI-3	3/13/2007	Anschutz Pinedale Corporation
BI-4	4/6/2007	BP America Production Company
BI-5	4/12/2007	American Gas Association
BI-6	4/5/2007	American Petroleum Institute
BI-7	4/5/2007	Bjorke, Lindley, Little, PC
BI-8	4/6/2007	EnCana Oil and Gas (USA) Inc.
BI-9	4/6/2007	Evviva Consulting
BI-10	3/15/2007	Green River Valley Cattleman’s Assoc.
BI-11	4/5/2007	Grey Wolf Drilling Company
BI-12	4/6/2007	Halliburton
BI-13	4/6/2007	Independent Petroleum Association of America
BI-14	4/6/2007	Kail Consulting, Ltd.
BI-15	4/5/2007	Mi Swaco
BI-16	4/5/2007	Nucor Inc.
BI-17	4/6/2007	Public Lands Council
BI-18	3/31/2007	Quarter Circle Five Ranch
BI-19	4/2/2007	Rocky Mountain Energy Reporter
BI-20	4/6/2007	Southern California Public Power Authority
BI-21	4/6/2007	StassCo Pressure Control, LLC
BI-22	4/4/2007	U.S. Chamber of Commerce
BI-23	4/6/2007	Utah Mining Association
BI-24	4/6/2007	Vision Oil Tools
BI-25	4/1/2007	Wyoming Ag- Business Association
BI-26	4/3/2007	Wyoming Business Alliance
BI-27	4/5/2007	Wyoming Business Council
BI-28	4/4/2007	Wyoming Pipeline Authority
BI-29	3/24/2007	Wyoming Stock Growers
BI-30	3/21/2007	60 Plus Association
BI-31	3/13/2007	Western Business Roundtable
BI-33	3/30/2007	Wyoming Wool Growers Association
BI-34	4/5/2007	Arrowhead Resources
BI-35	4/5/2007	Petroleum Association of Wyoming

Summary of Public Comments on the Draft SEIS

BI-36	4/4/2007	Baker Hughes
BI-37	4/6/2007	Independent Petroleum Association of Mountain States
BI-38	4/6/2007	Wyoming State Grange
BI-39	4/5/2007	Double J Ranch
BI-40	4/6/2007	Wyoming Farm Bureau
BI-41	4/5/2007	North Carolina Farm Bureau Federation
BI-42	4/4/2007	The Fertilizer Institute
BI-43	4/6/2007	Public Lands Advocacy
EG-1	3/15/2007	Alliance for Historic Wyoming
EG-2	4/6/2007	Audubon Wyoming
EG-4	4/5/2007	Joint Letter - Wyoming Outdoor Council, The Wilderness Society, Greater Yellowstone Coalition, Upper Green River Valley Coalition, Natural Resources Defense Council, Biodiversity Conservation Alliance, Jackson Hole Conservation Alliance, National Wildlife Federation, Wyoming Wildlife Federation
EG-5	5/30/2007	Grouse Inc.
EG-6	2/15/2007	National Historic Trails Center Foundation
EG-7	4/3/2007	Oregon California Trails Association
EG-8	3/23/2007	Stop the Drilling
EG-9	2/12/2007	Joint Letter – The Wilderness Society, Audubon Wyoming, Theodore Roosevelt Conservation Partnership, National Wildlife Federation
EG-10	2/6/2007	Theodore Roosevelt Conservation Partnership
EG-11	4/6/2007	Wilderness Watch
EG-12	2/13/2007	Meredith Taylor, Wyoming Outdoor Council
EG-13	3/11/2007	William Alldredge Wyoming Outdoor Council and The Wilderness Society
EG-15	3/26/2007	William and Flora Hewlett Foundation Cindy Copeland and Megan Williams
EG-16	4/2/2007	Environmental Preservation Foundation
EG-17	3/22/2007	Craig Thompson, National Wildlife Federation
EG-18	4/6/2007	Habitat for Wildlife
EG-19	7/23/2007	Biodiversity Conservation Alliance
EG-20	4/6/2007	North American Grouse Partnership
EG-21	4/5/2007	The Ark Initiative
I-1	4/3/2007	Robert Barrett
I-2	4/6/2007	Peggy Bryant

I-3	2/13/2007	Elaine Crumpley
I-4	3/15/2007	Lance Cygielman
I-5	3/23/2007	Lauren DeGraffenreid
I-6	4/5/2007	Alexandra Fuller
I-7	2/13/2007	Evangelos Germeles
I-8	4/6/2007	Evangelos Germeles
I-9	3/20/2007	Joannie Hale
I-10	3/13/2007	Jessica Hein
I-11	3/6/2007	Kevin Holdsworth & Jennifer Sorensen
I-12	4/12/2007	Ty Huffman
I-13	4/6/2007	Jeffrey Jacquet
I-14	2/22/2007	Jocelyn Moore
I-15	4/5/2007	Jocelyn Moore
I-16	2/20/2007	Al Radke
I-17	1/15/2007	Peter Robinson
I-18	3/30/2007	Sam Sharp
I-19	4/6/2007	Albert Sommers
I-20	4/2/2007	Albert Sommers
I-21	4/2/2007	Laurie Vigyikan
I-22	4/5/2007	Ronald P. Walker
I-23	4/5/2007	Mary Lynn Worl
I-24	4/6/2007	Jimmy Young
I-25	4/24/2007	Laurie Goodman
I-26	3/14/2007	Michael Kramer
I-27	3/14/2007	Daly Edmunds
I-28	3/21/2007	Loretta Walters Huston
I-29	4/6/2007	Earline Hittel
I-30	4/6/2007	Mary Byrnes
I-31	4/29/2007	Jennifer Jensen
I-32	4/6/2007	Ken Schaible, Grace and Gene Pike and Jeff and Diane Palmer
I-33	2/3/2007	Laura and James Cafferty
I-34	3/27/2007	Susan Marsh
I-35	1/25/2007	Rachel Murphree
I-36	2/11/2007	Sue Sommers
I-37	2/13/2007	Barbara Parsons

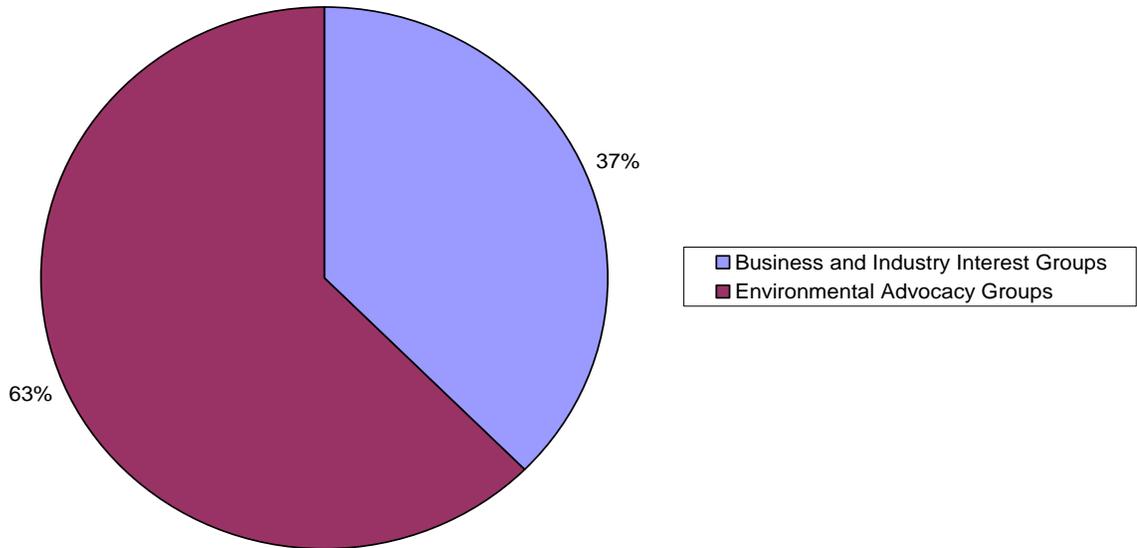
Summary of Public Comments on the Draft SEIS

I-38	3/1/2007	Larry Lambeth
I-39	3/2/2007	Alexandra Fuller
I-40	1/25/2007	Priscilla Titus
I-41	1/30/2007	Martha Grewal
I-42	2/28/2007	Shasta Pistey-Lyhne
I-43	3/15/2007	Dan and Janet Blair
I-44	1/30/2007	Stew and Mimi McMillen
I-45	1/25/2007	Marjorie Grant
I-46	4/6/2007	Bob McCarty
I-47	3/31/2007	Dick and Nancy Riddle
I-48	2/13/2007	Philip and Patricia Washburn
I-49	3/1/2007	C.L. Rawlins
I-50	3/13/2007	Sterling Kinnell

1.7.2 Form Letters

As noted above, approximately 62,200 form letters were received from business and industry interest groups and environmental advocacy groups. Figure 3 shows the distribution of these form letters. Due to the large number of form letters received, BLM did not log the names of each person submitting a form letter.

Figure 3 - Distribution of Form Letters by Interest Group



1.7.3 Log of Form Letters

Form Letter	Number Received	Organization
FL-1	63	Industry Interest Group
FL-2	3614	Shell Employees/BIPAC
FL-3	16,212	Environmental Advocacy Group
FL-4	6014	Environmental Advocacy Group
FL-5	16,790	Environmental Advocacy Group
FL-6	87	Western Petroleum
FL-7	18,085	Consumer Energy Alliance
FL-8	1381	Freedom Works
FL-9	5	Quail Tools
FL-10	103	Wyoming Business Interest Group