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March 24, 2007

Matt Anderson
Bureau of Land Management
P. O. Box 768
Pinedale, WY 82941

Dear Mr. Anderson:

The Wyoming Stock Growers Association (WSGA) appreciates the opportunity to provide comment on the Draft SEIS for the Pinedale Anticline Oil and Gas Exploration and Development Project. WSGA has represented the interests of Wyoming's cattle industry for 135 years. Our roster of over 1000 members includes private landowners and BLM grazing permittees who are being directly affected by the development in the Pinedale Anticline Project Area (PAPA).

WSGA recognizes the critical importance of production of Wyoming's mineral wealth and the tremendous economic contribution, both public and private, that the oil and gas industry makes to our state. At the same time we are experiencing the significant impacts that such development is having on our industry. We believe that, through careful planning and coordination, the negative impacts can be minimized and positive long-term benefits can be realized. WSGA has made a commitment to the mineral industry to work cooperatively to achieve these results.

In particular, full development of the PAPA will affect area ranchers. Within some allotments, significant AUM's of livestock grazing will be temporarily lost. The potential for the introduction of noxious weeds will be enhanced. Some increases in erosion are likely. Displaced wildlife may have as yet unknown impacts on private lands. Livestock grazing patterns will change in some areas. Increased traffic, inadequate pit fencing and wanton destruction of private property are potential negative impacts. Each of these impacts can be mitigated to some extent.

After careful review of the three alternatives analyzed in the Draft SEIS, WSGA believes that the Proposed Action is the preferred alternative to minimize overall impacts on the interests of livestock producers. We acknowledge that this alternative will have significantly more severe short-term impacts in the areas of concentration. It will require a greater commitment toward addressing the temporary loss of AUM's in those areas. However, this short-term impact will be offset by several advantages that will accrue from the proposed year-round drilling and expedited field development.

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Livestock use on the BLM lands within PAPA is seasonal. Therefore, winter drilling should reduce the level of overall activity during the grazing season. We anticipate less livestock disturbance, lower vehicular traffic, and less dust over the life of the project. In addition, less seasonality in the work force should enhance community stability and reduce the social problems associated with rapid growth. Hopefully, it will also assist in mitigating the current critical shortage of ranch labor in the area.

WSGA has met with representatives of the operators advocating the Proposed Action. We are confident that they have made a commitment to coordinate with landowners and grazing permittees in the area. WSGA has committed to being a part of that process.

GR-1

BI-29-2 Significant mitigation steps by both BLM and the operators will be needed to assure that the Proposed Action does not have unacceptable impacts on livestock grazing. Temporary loss of AUM's in the areas of concentration may require that BLM and/or the operators provide for alternative grazing. Where this is not possible, there should be direct financial compensation of permittees for lost grazing opportunity. Reclamation must be timely and effective. Increased impacts of wildlife on private lands or hay supplies must be mitigated.

Landscape level mitigation efforts currently under discussion such as the WCLI can be a valuable tool in addressing these concerns. However, it is essential that they include a livestock emphasis component.

PA-2

BI-29-3 WSGA urges your adoption of the Alternative B, the Proposed Action. Thank you for your consideration of our comments.

Sincerely,



Jim Magagna
Executive Vice President

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