



April 6, 2007

Matt Anderson
 BLM Pinedale Field Office
 432 East Mill Street
 Pinedale, Wyoming 89241

Re: Draft Supplemental Environmental Impact Statement for the Pinedale Anticline Oil and Gas Exploration Development Project

Dear Mr. Anderson:

These comments are submitted on behalf of the Independent Petroleum Association of Mountain States and its 375 member companies regarding the Bureau of Land Management's (BLM) Draft Supplemental Environmental Impact Statement (DEIS) for the Pinedale Anticline Project Area. IPAMS strongly supports conducting limited year-round drilling in the Pinedale Anticline Area as proposed in Alternative B.

Natural gas is a vital source of energy and plays a crucial role in meeting the nation's economic and environmental quality goals. The Pinedale Anticline is recognized as a vital natural gas resource, estimated to be the second largest in the United States, with enough natural gas to supply 10 million homes annually for the next thirty years. The development plan proposed by Ultra, Shell, and Questar would efficiently develop these vital energy resources while including many benefits to minimize the impact on wildlife and the environment.

The plan establishes Concentrated Development Areas (CDA) within a core area that will reduce fragmentation of habitat and leave large, continuous wildlife migration corridors. The CDAs will ensure that viable wildlife populations can co-exist with responsible energy development. The Proposed Action ensures a small footprint, leaving 92% of the Anticline undisturbed.

Another significant feature of Alternative B, the Operators Plan is year-round drilling on multi-well pads within the CDAs. This aspect of the plan will result in fewer well pads and full, efficient development of natural gas resources in less time than under stipulations that mandate drilling cessation, leading to earlier reclamation of the land. Multi-well pads minimize disruption to wildlife when rigs are moved, reduce the number of roads required, and diminish habitat fragmentation. In fact, the plan that Ultra, Shell and Questar have developed will result in fewer well pads than allowed for in the 2000 Record of Decision.

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The operators are incurring significant costs to use new technologies that go above and beyond typical best management practices in order to reduce the environmental impacts of development. Liquids gathering systems are being implemented that will significantly reduce emissions and truck traffic. At maximum production, 165,000 truck trips will be eliminated annually than would otherwise occur, thereby reducing emissions and disruption to wildlife. New drilling rig technology will reduce rig emissions by half.

Besides the many benefits to wildlife and the environment, enabling year-round drilling has additional socio-economic benefits. Continuous drilling results in year-round employment for drilling crews and associated contractors. A stable workforce is better for local communities than the transient workforce that results when activity is halted for several months a year. When natural gas workers are employed year-round, they become integrated into the community and local communities are better able to plan for schools, housing, roads, and other needs.

In conclusion, Ultra, Shell and Questar have put together a ground-breaking plan to reduce the impacts of natural gas development while meeting the vital energy resource needs of the country. The plan uses innovative approaches that go above and beyond standard best management practices to develop the field in a sustainable way. The No Action Alternative in the SEIS leaves as much as two thirds of the natural gas resource in place, which is contrary to the national goals of energy security that results from developing domestic resources.

IPAMS urges the BLM to approve the action proposed by the Operators, Alternative B. IPAMS also supports planning and monitoring efforts by the BLM and Wyoming Game and Fish Department, as well as on-going wildlife research and air quality monitoring.

Sincerely,



Kathleen Sgamma
Manager of Government Affairs

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