HALLIBURTON

1125- 17th Street, Suite 1900 • Denver, CO 80202
PHONE 303.308.4200 • FAX 303.571.8283

Jim Brown
Senior Vice President
Western Hemisphere
303-308-4220 Office
720-308-3619 Cell

April 4, 2007

2007 APR -5 AM 7:55

Matt Anderson, Project Lead
Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, Wyoming 82941

Re: Supplemental Environmental Impact Statement (DSEIS) for the Pinedale Anticline Oil and Gas Exploration and Development Project, Sublette County Wyoming

Dear Mr. Anderson:

Halliburton Energy Services appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Pinedale Anticline Oil and Gas Exploration and Development Project in Sublette County Wyoming. Halliburton provides stimulation, logging, directional drilling and cementing services to the oil and gas industry and employs 1,306 employees in the state of Wyoming with 200 of them working in the Pinedale Anticline field. We have major offices in Rock Spring and Casper and have employed Wyoming residents since 1948.

The Pinedale Anticline is estimated to be the second largest natural gas field in the United States with enough clean-burning natural gas to supply ten million homes for over 30 years. It is a relatively young field with approximately 4400 additional wells to be drilled to recover 20-25 TCF of natural gas reserves. This field is early in its development and is at a critical juncture for determining how it will be operated.

The Proposed Action (Alternative B) submitted by Ultra Resources, Inc., Shell Exploration & Production Company, and Questar Market Resources is a unique and balanced proposal that is site specific to the Pinedale Anticline. This innovative approach to development and production of the field benefits wildlife, air quality, and the nation's consumers.

The plan reduces by 100 the number of needed pads through directionally drilling which allows 92% of the PAPA to remain undisturbed. It also significantly reduces human disturbance associated with development activities by use of liquids gathering systems and remote operation of producing wells.

The proposal to allow year-round development by suspending seasonal stipulations in just 6% of the PAPA supports wildlife needs while simultaneously reducing some of the negative impacts of erratic, seasonal development, including a temporary, unstable workforce and minimal capital investment for rigs operating in fields with severely limited access opportunities.

Halliburton currently brings 100 seasonal workers into the Rock Springs office every spring to support summer completion and drilling operations in the PAPA. One result of the current seasonal stipulations is that no completion operations are allowed in vast parts of the PAPA for 3-6 months of each year. This has the effects of greater summer time traffic, increased industry use of motels and the need for temporary housing in the area.

The operators' Proposed Action will positively address the following issues:

- Create a long term, stable workforce by reducing transitional workers
- Minimize the need for temporary housing or "man camps"
- Stimulate investment in safe, more efficient fit-for-purpose rigs
- Reduce rig emissions by 50%
- Support workforce training and safety efforts

The No Action will leave as much as two thirds, or 14 trillion cubic feet, of much-needed, clean burning natural gas in the ground and will also result in lost opportunities for minimizing habitat fragmentation, reducing rig emissions and eliminating most trucking of produced liquids.

PA-1 BI-12-1 For the reasons outlined above, Halliburton respectfully requests that BLM select the operators' Proposed Action (Alternative B) to supplement the 2000 PAPA ROD.

Sincerely,

Jim Brown

JSB/jg

JSB-07111

2007 APR -6 AM 7:55