

Bill Worf
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April 4, 2007
(sent by FAX and mil)

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

Dear Mr. Anderson;

This letter is to comment for consideration as you proceed with the Pinedale Anticline Supplemental EIS. These comments are presented for myself as an individual and as a member of the Board for Wilderness Watch. Wilderness Watch is a national non profit citizen organization dedicated to providing citizen oversight to insure proper stewardship of our National Wilderness Preservation System (NWPS). I was one of three founders of Wilderness Watch in 1989. Wilderness Watch is headquartered in Missoula Montana. Its address is P.O. Box 9175, Missoula, Mt. 59807. Mr. George Nickas is Executive Director - Phone 406-542-2048.

I have a special personal interest in the Bridger Wilderness. I served as Supervisor of the Bridger National Forest from 1961 to 1965. The Bridger Wilderness had been established shortly before I arrived on the scene. I launched a Wilderness stewardship program that attracted attention of folks working to get the Wilderness Act passed and I had the honor of hosting Mr. Howard Zahnizer, author of the Act, on a trip through the Wilderness. When the Act finally became law in 1964, I was tapped for duty in the FS National Headquarters to help guide implementation of its mandates.

As we understand the Pinedale Anticline SEIS, you are proposing approval of 4,399 additional wells above the 700 already approved. Modeling for the proposed action shows it will impact visibility in the Bridger Wilderness area \geq 1.0 deciview level on 67 days per year just related to project emissions alone. Looking at cumulative impacts they are estimating 77 days at or above 1.0 deciview. The modeling also shows that there are an estimated 45 days of current impacts due to the project. This is because the scale and pace of development has been much faster than was originally analyzed. (i.e., 32 drill rigs vs 8 in original model, and engines of 4,500 HP vs 1,500 in the original model).

From a personal point of view, the O&G development in Wyoming had not been on my radar screen. I was amazed to see the extent of that development. For that reason I have read extensively in the preparation of these comments. One of the most complete

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documents with reference to this proposal is the paper prepared by Mr. Bruce Pendery of the Wyoming Outdoor Council. It is titled "EVIDENCE OF IMPAIRMENT ON AIR QUALITY RELATED VALUES IN THE BRIDGER WILDERNESS AREA, WYOMING". It was published February 8, 2007. We generally agree with Mr. Pendery's findings. Two paragraphs from the DISCUSSION AND CONCLUSION section of his report are quoted here.

"The weight of the evidence from the above studies and observations shows that visibility and perhaps other air quality related values have been impaired in the Upper Green River Valley and that this impairment extends into the Bridger Wilderness Class I area. Visibility impairment is not limited to the summer when forest fires may explain some of the impairment. While more definitive evidence would be desirable, it is apparent that oil and gas development, especially in the Jonah and Pinedale Anticline fields, is or soon will be a significant contributor to this impairment. As was poignantly served by Dan Olson, former Wyoming Air Quality Division Administrator, "proximity counts" when considering the impacts of air pollution in the Upper Green River Valley. There is no doubt that the Jonah and Pinedale Anticline fields are in very close proximity to the Bridger Wilderness Area and that they are undergoing massive levels of industrialization, with the attendant levels of air pollution emissions. Therefore, when the weight of the evidence presented here is considered there can be little doubt that these fields, especially when coupled with the extensive additional oil and gas development that is occurring in the state, are or soon will be significant contributors to the haze that is impairing visibility in the Bridger Wilderness Class 1 area.

Given the clear indications of impairment that are already present, and the modeling showing future impairment, the Forest Service should meet its "affirmative responsibility" to protect air quality related values in the Bridger Wilderness Area and certify that visibility, and perhaps other air quality related values, is impaired in this magnificent area so that the protections envisioned by the Clean Air Act and the Wilderness Act can be given effect. This is necessary to prevent any future impairment of visibility and to remedy any existing impairment, as required by the Clean Air Act, and so as to leave this area unimpaired and preserved for wilderness values, as required by the Wilderness Act."

The Supplemental EIS refers only to the Bridger Wilderness. However, you need to recognize that these drilling projects will produce haze that will slop over the ridge surrounding the Green River Basin with the probability that visual quality may also be impacted on the Popo Age, Washakie and Gross Ventre Wildernesses which also carry the Class I Visual Quality standard. We recognize that these Wildernesses and the Bridger Wilderness are all under the management by the US Forest Service. Never the less, the BLM carries an "affirmative responsibility" to be sure that nothing takes place on BLM

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administered lands that will adversely effect the visual quality on these Class I areas.

We find nothing in the Supplemental EIS which indicates that you have explored the possible effect this proposed activity might contribute to global warming.

Accordingly, we request that your analysis be expanded to consider what must be done to:

1. Consider what actions must be taken to guarantee no visual impairment of the Gfos Ventre, Popo AGie, Washakie and Bridger Wildernesses. and,

2. What must be done to minimize or prevent any potential effect to Global warming.

Thank you for the opportunity to comment. Please keep us informed and involved as you move forward with the Decision process.

Sincerely;


Bill Worf

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