



April 6, 2007

Matt Anderson, Project Leader
BLM Pinedale Field Office
P.O. Box 768
Pinedale, Wyoming, 82941

Dear Mr. Anderson:

I am writing to provide comments on the Draft Supplemental Environmental Impact Statement (SEIS) for the Pinedale Anticline Oil and Gas Exploration and Development Project (PAPA) within the Pinedale Field Office.

We appreciate the BLM's recognition that additional analysis is required prior to authorizing further development of the area on the scale contemplated in the proposal. Particularly given the possibility of reduced analysis or certainty of later-stage projects pursuant to statutory Categorical Exclusions under Section 390 of the Energy Policy Act of 2005, we believe it is imperative that BLM thoroughly assess both the environmental baseline in the area and the environmental consequences of various approaches to developing the area.

The PAPA SEIS process must not be used to further weaken environmental protections for fish and wildlife at the same time increasing development of the project area, without a structured process for determining the extent and value of the resource losses, both direct and indirect. Furthermore, it is important that actions authorized in the PAPA SEIS process not pre-judge the outcome or foreclose meaningful alternatives for the Wyoming BLM's ongoing revision of the Pinedale Resource Area Resource Management Plan.

Most importantly, **Interim Management guidelines need to be developed during the completion of this NEPA analysis that outlines what the BLM will approve and authorize from the existing decisions as to not preclude selection of any viable alternative.** This is extremely important due to the proposals from the companies to develop delineation wells outside of the core development areas and in areas where there is important wildlife habitats. Without Interim Management, development can proceed in areas that could be considered for use as "mitigation" for currently 3:1 acre commitments by Questar (Questar Winter Drilling DR).

Concerns about this SEIS are highlighted below and should be addressed in your final EIS.

- It is unclear from this document what decisions and authorizations are being carried forward from the 2000 PAPA Record of Decision and subsequent other decisions for the project area (Questar Year-round Drilling, etc.).
- Based on the scope of the proposal and how it was analyzed, we believe that this should not have been a "supplemental" document, but a complete, full, stand-alone EIS that evaluates more than just 2 alternatives (proposed actions and alternative C) and include alternatives

Dr. Rollin D. Sparrowe
P.O. Box 415, Daniel, Wyoming 83115 307-859-8351, rds@centurytel.net
www.trcp.org

- AL-2 | EG-10-3
- G-3 | EG-10-4
- G-4 | EG-10-5
- G-5 | EG-10-6
- T-1 | EG-10-7
- W-1 | EG-10-8
- G-6 | EG-10-9
- G-7 | EG-10-10
- G-8 | EG-10-11
- W-2 | EG-10-12
- G-9 | EG-10-13
- that fully consider phased development and restricting development outside of already developed areas on the PAPA.
 - No new leasing of un-leased acres (or expired and leases that have been turned back in) should take place and be included in the SEIS.
 - No development in the un-developed “flanks” and other important wildlife habitats should take place while consolidated development takes place within the crest (including any delineation or wildcat well drilling).
 - Specific areas for mitigation should be identified and included in an approved mitigation plan BEFORE project is approved.
 - Mitigation that is stated for reduction in traffic (pipelines) should be in place BEFORE any year round consolidated development proceeds, similar to the commitment in the Questar YRD DR.
 - Complete disclosure of existing mitigation actions need to be included in the final EIS including where the current 3:1 acre for acre mitigation has taken place and how it was effective in off-setting impacts from development.
 - The mitigation process needs to be clear and defined and not just a single payment buyout (like Jonah). It should include structured, science-based evaluation of what is being lost and what would be replaced by restoration and management.
 - Clustering and directional drilling on the Anticline Crest can be a part of onsite mitigation attempts, but are not alone going to lessen impacts to wildlife.
 - Strong regulation of activity by personnel and vehicles with careful monitoring must be a part of impact reduction attempts.
 - The objective of protecting the undeveloped areas is to completely protect remaining existing sage habitats. Active manipulation of those remaining sage habitats is not acceptable during the development of the crest.
 - Monitoring should include scientifically sound approaches to tracking development effects on already damaged mule deer and sage grouse populations, and pronghorn that will face new pressures as the geographical as well as intensity of development spreads. There should be a monitoring plan and commitments to conduct it as part of the decisions.
 - Stipulations to protect wildlife from disturbance in winter should be employed on all areas outside clearly designated drilling and production facilities. This includes no exceptions for development or operations during development of the crest.
 - This new level of intensive development will adversely impact mule deer, sage grouse, pronghorn and other wildlife. Thresholds for reduced development activity should be set before this stage of development begins, which includes acknowledgment and consideration of losses already occurred through development to-date (this is a supplement, so this is a valid statement).

G-10
 AM-1
 G-11
 G-12
 G-13
 W-3
 W-4
 W-5
 TE-1
 T-2
 G-14
 W-6

- Many of the things promised in the SEIS, such as “course corrections” if wildlife are impacted were promised in the 2000 ROD and not implemented. Accounting and clarification of what has been done and what has not been done, and why, should be part of the SEIS.
- It is unclear if the PAWG will be part of the approval of the SEIS, given its failure a clear adaptive management process with trigger points for action should be included. This includes commitments to change operations and other actions during the annual drilling meetings or when needed and NOT just post-decisional monitoring changes.
- Voluntary mitigation is unacceptable since mitigation clearly described in the 2000 ROD was not enforced. There should be a clear mitigation plan before further development occurs.
- Commitment to Best Management Practices needs to be mandatory for all development and post development actions.
- Impacts from operation and maintenance of wells and infrastructure needs to be included in the analysis and part of any mitigation.
- Impacts to wildlife from the foreseeable paving and upgrading of County and BLM roads needs to be included in the analysis and mitigated. No BLM roads should be paved due to this project.
- The proposed actions for sage grouse outside of the consolidated development areas are not adequate to protect and conserve sage-grouse (timing restrictions, ¼ mile buffer) based on recent available science.
- Onsite mitigation should consider the "site" as the area of influence of development activity on specific wildlife, not just the disturbed surface area-thus the 3:1 acres for like acres cannot be just road and pad surface, but the zone of negative influence on wildlife, which varies by species, but is documented.
- Mule deer and sage grouse research and monitoring should be continued -the base of data on pre- and post-development impacts is critical to evaluating future development. This includes long-term commitments to the Sublette Mule Deer Study.
- Any depletion or withdrawal of water, groundwater or surface, from the Green River Basin is considered an adverse impact to Colorado River fishes and therefore must be formally consulted the US Fish and Wildlife Service and a Biological Opinion received, before project approval.
- Results of the traffic and activity monitoring for winter-time activities must be included in the analysis, both from the monitoring station and the Sublette Mule Deer Study.
- It is disturbing that BLM has decided to “re-interpret” definitions from the original PAPA ROD for wells and well-pads, this is rather clear to the reader in the original document.
- Development of the deep, or any other, formations for fluid minerals must be included in this analysis because of the potential impacts to surface resources.
- Update fish and wildlife information should be used in the final EIS based on the most recent surveys and inventories.

- R-1
EG-10-26
- Impacts to the fishing and hunting in the region that are a consequence of this development need better investigation and analysis.

G-15
EG-10-27

All alternatives should retain sufficient management discretion for BLM to permit development of the gas resource without improperly committing itself to wholesale conversion of the area from lands containing wildlife habitat, rangeland, watershed and energy resources, into a single-use zone effectively committed to natural gas extraction to the exclusion of most other uses. We urge the BLM not to preemptively restrict its options in the Resource Management Plan revision by, in a decision on the PAPA project, foreclosing any alternative that would preserve some or all of the PAPA area for its wildlife, watershed and recreation values.

Therefore, the Federal Land Policy and Management Act sets forth a multiple use mandate that federal agencies may not ignore. With regard to the PAPA project area specifically, this means that the Pinedale office of the BLM must consider effects on the conservation of wildlife species and habitat, notably mule deer, pronghorn, moose, and greater sage-grouse, in determining appropriate natural gas extraction management.

I do have concerns that the SEIS as a whole does not provide adequate assurances for mule deer, pronghorn, moose, sage grouse, and trout. I am concerned that the cumulative impacts from this project in addition to other projects could contribute to a region-wide species decline. Such decline is likely because while it is possible that wildlife within the impacted area will move to other, offsite areas, there is evidence that this will only overburden the surrounding area where wildlife have relocated as the result of other project. The presence of existing development and other ongoing and proposed projects in the area also means that relocation of wildlife to adjacent habitats will be limited by the fact that the impacts of large-scale developments within habitats cannot be absorbed by surrounding habitats because wildlife populations already occupy whatever vacant, suitable habitat exists. To the extent ownership constraints may limit BLM's ability to manage impacts to mixed-ownership areas, effective protection of remaining sensitive resources on federal surface that can be effectively managed is more important, not less.

W-7
EG-10-28

The SEIS does not provide adequate mitigation for the impacts upon these resources which provide income, subsistence, and recreational opportunities to the public. I suggest that a conservation strategy for wildlife and fisheries be included within this document before approval. This Conservation Strategy should include wildlife and fisheries management objectives and actions including habitat management guidelines and impact thresholds. This strategy should be completed and approved before full scale development of the area is started. Additionally, a mitigation plan and schedule needs to be developed that is based on rigorous scientific methods and appropriate for the impacts to fish and wildlife resources. To complete this adequate, up-to-date baseline information on important wildlife species must be collected before development starts. Also, the mitigation process needs to be a structured process based on science and include both short term and long term actions along with a dedicated funding source for mitigation actions implementation.

I am concerned that the impacts the PAPA Project Area and adjacent proposed natural gas development areas will have on crucial winter ranges and migration corridors have not been analyzed. I am also concerned that no strategy is in place for protection of migration and movement areas for migrating big-game. Lastly I am concerned that the most up to date science has not been used within the SEIS, including BLM funded research within the resource area and other parts of the state.

AM-2
W-8
EG-10-29

Considering a large portion of the Sublette mule deer herd's crucial winter range and many sage-grouse leks will be affected by current proposed SEIS, an adequate strategy for limiting the affects on wildlife should be included in the plan. The current SEIS suggests monitoring affects as field development occurs and does not take into account current scientific studies regarding natural gas development on both sage-grouse and mule deer. Subsequently, adaptive management processes should be used and

AM-2
EG-10-29

based upon monitoring data so that a systemic approach to adjusting development can be made when other natural resources are affected.

It is undeniable that intensified energy development in the PAPA area will have significant effects on big game and sage grouse habitat and reduce opportunities for sportsmen to enjoy fish and wildlife resources. Under CEQ NEPA regulations, BLM must make use of all the best available scientific information to assess these effects, including cumulative effects from other existing, proposed, or foreseeable development projects in the area. Multiple-use must remain a part of BLM's actions and this includes management for other valid public uses of the PAPA area, not just energy development.

AL-3
EG-10-30

It is clear to me that this SEIS is focused on one thing, assurances that the companies can get gas out of the ground as fast as possible. There are no considerate assurances that fish and wildlife populations will be maintained at current levels, or at even some acceptable, diminished level. It is also clear that the 2000 PAPA ROD has not made good on its adaptive management process to address impacts that, were at the time, uncertain. We know how the first six years of development has impacted resources and that should be the basis for the plan to develop the rest, but is still appears BLM is not ready to make that commitment. This document needs to be a stand-alone EIS that includes more alternatives than the ones presented. For sake of conserving the mule deer and sage grouse that are left on the PAPA, no development outside the consolidated development on the crest is essential for the life of that development. Finally, clear indication of what the energy companies are giving up needs to be outlined, so that the public can determine if they are commensurate with what wildlife resources they have given up.

I appreciate opportunity for comment. Please contact me if you have questions on my comments and recommendations.

Sincerely,

Dr. Rollin D. Sparrowe
Theodore Roosevelt Conservation Partnership