

SDSBT
P.O. Box 121
Bondurant, WY 82922
sdsbt@wyoming.com

Below please find comments on the Supplemental Draft Environmental Impact Statement for the Pinedale Anticline, prepared by Linda Cooper, Spokesperson

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There are many problems with this SDEIS and with the "spin" that is built into its backbone! There are policy disconnects, contradictory statements, substantive shortcomings and a general absence of credibility.

In the first instance, the SDEIS asks the reader to "shrug off" the joint admission by BLM and the companies that the original EIS and the subsequent 1999 Record of Decision (ROD) is bankrupt. The EIS and the ROD, by admission, is not only entirely wrong, but since 1999 both the agency and the companies have knowingly continued to pursue exploration and development without engaging the very serious impacts except when public outrage demanded. We believe this is a gross abrogation of responsibility by both parties that has resulted in a disorderly, disruptive, environmentally unsound development process with resulting measurable negative impacts on the land, water, air, wildlife and the quality of life in the communities surrounding the anticline.

The staggering admission by the BLM that what has transpired on the ground bears no relationship to either the earlier EIS or the ROD raises important policy, administrative, and legal questions concerning NEPA, management capability and the credibility of the companies allowed the rights to exploit federal minerals in the anticline.

While past is not prologue in all cases, in this case citizens can only assume, based on the 2007 Supplemental Draft Environmental Impact Statement (SDEIS) that the BLM is willing to continue in its role as industry apologist and facilitator, and the companies, given how little they are required to do and invest to earn excessive profits appear to be driven by one thing the "annuity status" that an estimated 60 year anticline development plan provides.

Thus the gross size and scale of the industry proposal and the price it proposes to exact on the Pinedale Anticline and the surrounding area values is unacceptable as it stands.

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The proposal can be interpreted as "give us year round drilling and we'll invest more to do a better job." Our answer to that demand is "do a better job to ameliorate present damages already evident and better define those going forward; and no you cannot have carte blanche to expand to thousands of additional wells and year round development even for the core areas. These demands makes little sense given the impacts already documented and with existing lease restrictions". We have grave concern that the BLM has, in already granting a waiver to the restrictions and stipulations on the leases regarding seasonal drilling restrictions, not carried out the appropriate process to do so.

Absent a specific public process stipulations and restrictions on leases cannot be altered once they have been attached to leases. Why these seasonal restrictions have already been, and further could be changed is a serious legal question for the BLM to answer.

In moving from seasonal to year round drilling as industry has proposed, what are citizens supposed to assume that the other half of the mule deer herd will now be decimated? And we suggest that while the mule deer herd and sage grouse act as "the canaries in the coal mine" typifying gross negative effects on wildlife, there are many other more subtle impacts related to the carrying capacity of the land, the integrity of water, air pollution and possibly health related effects associated with air toxics that are not being well monitored, documented and accounted for. The burden of proof is in the SDEIS process and there is insufficient evidence that this burden has been met.

The Pinedale Anticline development is not operating in a vacuum

The BLM continues to lease swaths of land encompassing much of Sublette County on both public and private lands, and the recently released Draft Pinedale RMP "prefers" to make available for leasing and development much of the rest of Sublette County from the Jonah Field north! Couple these with the BTNF plan revision to the north and the Draft EIS for the Eagle Prospect wells just released and the big picture is a mega-sized energy map including most of Sublette County and stretching north to Grand Teton National Park.

Thus the larger picture, not the incremental decision-picture that the BLM and the companies may choose to portray here, is a gross exaggeration of reasonable safe and necessary development pattern; a picture the companies and the BLM wrap in a cloak of patriotism, as though it were acceptable to

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degrade Wyoming as a sacrificial lamb to a mythical self-serving national energy scenario.

Wyoming is one of 5 natural gas producing states in the US and has emerged as more significant because of supply interruptions several years ago resulting from off-shore Gulf coast hurricanes. The simple fact is that the US imports natural gas from Canada and Mexico with whom we have integrated pipeline systems and excellent working relationships for many years. This partnering does not constitute a threatening foreign supplier situation. In 2007 the US is storing natural gas and exporting natural gas to Mexico. These facts presented in more detail below debunk the myth and reinforce the fact that the impacts to be attentive to are local and not global.

The SDEIS document reports that the reason "they got it wrong" in the first place was because they didn't have the resource well characterized; then in contradiction it goes on to say that the purpose of the industry proposal to expand drilling by adding 4,000 new wells is to "define the extent of the supply, further contribute to the natural gas supply available to the nation, consolidate year round activity to the most productive areas of natural gas development to date, provide for compensatory mitigation, further reduce national dependence on energy from foreign sources, contribute to supplies of clean burning fuels, allow operators to develop an additional 20-25 trillion cubic feet (TCF) under existing leases..."

The original 1999 ROD was unsuccessful as a plan and or agreement among the parties. The disconnect between it, the reality and this new proposal, suggests little reason to believe in either the efficiency claims of this new proposal or its anticipated impacts.

We suggest that experts without ties to the BLM and the companies be empanelled to review the data, see where more information is required, and outline a plan for the reasonable extraction of gas done in an environmentally acceptable manner before any decisions are made to proceed with either the industry plan or the BLM preferred alternative.

Regarding the alternatives: The base case, "the no action alternative" even when corrected for spatial modification is not acceptable as a no action alternative. The plan incorporated into the ROD is already noted as faulty; the admission that it was "gotten wrong" is not self-correcting, thus the no action alternative is based on nothing! The concept of a no action alternative holds a presumption of correctness, and or satisfaction with the status quo against which alternative proposals can be measured. This SDEIS does not do that!

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EG-8-2

Both the BLM and the companies "bit off more than it could chew" in the "rush to the bank", and resource values highly prized locally have been severely threatened if not permanently damaged as a result. To increase the risk by granting a nine-fold increase in drilling under the banner of less environmental impact and more efficiency flies in the face of reason given the performance to date.

G-2 | EG-8-3 | A new more conservative risk-adverse alternative is necessary to develop. We recommend that a reduced footprint and an environmentally improved set of options could become the first phase of a new ROD with increments added as production experience with pad sharing and other measures to reduce impacts evolves.

G-3 | EG-8-4 | We think this SDEIS is short on choice, management, oversight, and accountability. We do like the concept of performance standards, but that depends on what is being measured and who is doing the measuring. The BLM has not particularly excelled in this quarter. Federal monitors of benchmarks outlined in a set of new RODs may be an alternative approach worth considering.

According to the original ROD the number of installations is less than anticipated. As a performance contract the ROD failed. If the companies could not meet the 500-700 well target and they are now proposing 4,000 wells, the future might spell more impacts for less production thus violating the premise of "a full and fair return to the public for resources in the public domain" the basis of federal mineral extraction in the first place. And, the measurable public benefit has to be calculated in more than just revenue. So far while the treasury is full, the land has been decimated, the wildlife devastated, the ozone levels meet or exceed national standards in what was once the most pristine air-shed in the US, and the water quality benzene rich! This does not constitute a public benefit!

G-4 | EG-8-5 | We recommend a defined phased, stepped, sequential program that incorporates reclamation as a condition of subsequent well installation and the use of the temporary relaxation of certain restrictions as may become appropriate in time and as an incentive to better operations and staged field development.

AQ-1/GW-1 | EG-8-6 | The air, water and wildlife impacts are greater than forecast indicating a lack of competency in measurement and monitoring and the location of operating units. A more sophisticated and more comprehensive air quality monitoring, and

AQ-1/GW-1

EG-8-6

aquifer protection and water analysis program needs to be implemented before going forward to a subsequent stage of development.

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G-5

EG-8-7

Along these lines, we recommend that a real-time formal management arrangement with the Fish and Wildlife Service be established as a part of a "performance matrix" to make sure the program moves according to milestones that are prescriptive. We recommend a similar arrangement with EPA Region 8, Wyoming DEQ, and the USGS for air and water.

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EG-8-8

Use of individual dosimeters for workers as well as correctly placed field monitors with frequency measures suitable for the pollutants of interest including air toxics measures for public health and safety need to be planned and implemented.

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EG-8-9

Incentives to meet environmental thresholds need to be set. The temporary lifting of restrictions can selectively be used as a carrot toward these ends. We do not support the wholesale lifting of winter restrictions enabling year round activities, in every year, all the time. Whatever gains will be made by more efficient operations, year round operations for many decades forecast well beyond the 30 year traditional timetable for a well field like this, suggests unanticipated consequences, just as they were unanticipated since 1999.

Operations and production are reliant on workforce, rig availability, materials etc. and it is not clear that the estimates for well installation have taken the same encumbrances of the past several years into account.

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EG-8-10

The companies make the case that year round workers and year round drilling will attract a more stable and "community viable" work force thereby reducing the impediments to a more efficient schedule, however, no substantive information is available that analyzes workforce and equipment demand and supply commensurate with the target number of wells. This is a shortcoming that we recommend be corrected. As such shortages are likely to persist; it would suggest a realistic annually revised, staged, and sequential development plan.

Because of the original EIS work and the terms and conditions of the ROD have both been breached, it does not provide a level of confidence necessary to go forward with this industry proposal as it is proposed. The increase in the number of wells proposed and the length of time taken to conduct this work is too long lived. A shorter time frame may not necessarily be associated with the number of wells.

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PA-1 EG-8-11 The number of pads impacted by a consolidation of activities among the companies may be a more useful measure than the number of wells. We would suggest that "renovation of pads" to accommodate an increase in wells may present challenges unanticipated yet again.

GW-2 EG-8-12 Water supply relative to the targeted pads needs to be developed as well. Water requirements at existing well pad operations coupled with new drilling at the same pad means various and quite different water use patterns. Because Water is by far the more valuable resource, when compared to natural gas, water use and conservation must take precedence.

G-9 EG-8-13 Optimization of the use of well pads should decrease some negative effects but we recommend phased work and maintenance of seasonal restrictions that could be periodically relaxed as the progress of the work and the seasonal impacts coincide.

G-10 G-11 EG-8-14 We recommend that development "sprawl" be contained. If "the spine" of the Anticline is where the gas is, then sprawl out of this production zone is unnecessary. A new alternative should spell out how this would occur in terms of existing and new pads.

AQ-2 EG-8-15 Transport and generators are major sources of air pollutants. We recommend the use of bio-diesel and or other alternative fuels to optimize the reduction in pollutants released to the atmosphere.

The Supplemental Pinedale Anticline Environmental Impact Statement makes much of the need for energy security as a rationale for example for the dramatic nine-fold increase in the number of wells proposed for the Pinedale Anticline, we looked into the claim that the proposed escalation is tied to US energy security that would result from a reduction in foreign supplies of energy.

Several organizations produce annual energy forecasts and each are compared to one another. Thus it is not difficult to effectively understand if the effect that the dramatic escalation in activity in the Pinedale Anticline would indeed reduce the US reliance on imports as stated in the SDEIS.

Energy production and consumption are regularly forecast by the US Department of Energy. A review of the 2007 Annual Forecast of the US

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Department of Energy (DOE) Energy Information Administration (EIA) and comparisons of these forecasts to others, show that the rationale for increasing the rate of development in the jurisdiction of the Pinedale Field Office and in the particulars of the SDEIS is neither warranted by projected demand for natural gas, nor production.

While other organizations may project slightly higher or lower levels than that of the USDOE, EIA, the trend is the same for each. (Largely the differences lie in the estimate of economic growth. Factors that effect the projections from year to year include prices and economic growth (Gross Domestic Product or GDP and energy intensity of the economy i.e. how much energy is used per dollar of GDP).

The data below is a "snap-shot" from the US Department of Energy 2007 reference case upon which they project from 2007 to 2010, 2020 and 2030. These time frames are important because they can be associated with gas field development timetables and the Pinedale Resource Management Plan duration.

According to US DOE data, energy use per dollar of GDP or energy intensity is expected to decline at a rate of 1.8 percent while GDP growth is at 3 percent from 2005-2030. This reduction in energy intensity is attributable to increased energy efficiency in the economy. This trend has been in place since the 1970s as the US moved away from an industrial economy and toward a service economy. That transition is complete now.

Total consumption of natural gas in 2007 is projected as 22 trillion cubic ft (TCF) and in 2030, 26 TCF. (From 2020-2030 consumption is predicted to be flat).

In fact in 2007 natural gas production data from 1980-2030 is documented and projected to be flat.

The United States is also involved in the cross-border trade of natural gas with Mexico. U.S. is a net exporter of natural gas to Mexico. In 2002, the U.S. exported 0.26 Tiff of natural gas to Mexico, and is expected to remain a net exporter into the future. Export levels to Mexico are expected to reach 0.12 Tiff per year by 2025.

Natural Gas (Quadrillion Btus)	2010	2020	2030
US DOE, EIA 2007 Annual Review of Energy Consumption	24.73	27.04	26.09
Production	19.42	20.86	20.61
Net imports*	4.55	5.35	5.45

Imports include gas imported from Canada and Mexico our two largest foreign pipeline suppliers and LNG.

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Thus we draw the conclusion that the US DOE EIA domestic production from Wyoming does not change the forecast and thus the case that Wyoming natural gas production contributes to energy independence or security is not evident. In fact the effect of what is produced in Wyoming has little to no special effect and thus the important message regarding both the Draft Resource Management Plan issued by the BLM Pinedale Field Office, and the anticline SDEIS is that most of the impacts necessary to consider are local. Patriotism, to think that Wyoming is part of the solution to the US energy security problem, is noble, but does not apply in this case.

Each of these BLM plans and proposals for an excessive and far reaching development preferences stretching from the Jonah Field south of the Anticline north to nearly the boundary of Sublette County and if these two plans when coupled with the Bridger-Teton National Forest Resource Management Plan revision, the land available for exploration and production would stretch from the Jonah Filed nearly to Grand Teton National Park! We do not support this intensive push in the larger frame and are critical of the specifics of what has been proposed for the Anticline.

The expansion of the Pinedale Anticline to include approximately 4000 new wells to "prove the resource" while valuable to the companies will produce increased deleterious impacts than even those already acknowledged in the Draft. We assume that same level of error will occur as is acknowledged when comparisons to the original anticline ROD are made. While past is not necessarily prologue, in this case the margin of admitted error on the part of the BLM and the companies is so large, that one can only assume the worse case.

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Domestic Natural Gas Production (excerpts from the DOE EIA website)

According to the EIA, 19.05 Trillion cubic feet of dry natural gas was produced in the United States in 2002. This represents over 84 percent of total domestic consumption. This compares to crude oil, where only about 39 percent of consumption is met by domestic production. The United States is much less reliant on other countries for its natural gas supply than it is for its supplies of crude oil.

Domestic natural gas production comes primarily from 5 states: Louisiana, New Mexico, Oklahoma, Texas, and Wyoming. In fact, according to the EIA, these 5 states were responsible for just under 80 percent of total marketed natural gas production in 2001.

Dry Natural Gas Imports and Exports

According to the Energy Information Administration (EIA), net imports of natural gas accounted for 15 percent of natural gas use in the United States in 2002. About 95 percent of U.S. natural gas imports are from Canada. According to the EIA, net imports from Canada equaled 3.49 Tiff, and this level is expected to decrease at an annual rate of 1.4 percent to a level of 2.56 Tiff per year in 2025.

Under the terms of the North American Free Trade Agreement (NAFTA), producing companies operate freely across the U.S./Canada border, moving gas from Canada's major producing regions in Alberta and British Columbia as well as offshore from Nova Scotia to U.S. markets in the West, Upper Midwest, and Northeast. The natural gas pipeline transmission systems of the United States and Canada are highly integrated. Canada's vast gas reserves, coupled with its relatively small population, provide the United States with a reliable source of natural gas imports to help meet rising demand.

Linda J Cooper is an energy and environmental policy and technology expert who has served in government, held an appointment at Princeton University, an executive position at a Chicago based research and development firm, and most recently chairman and principal of a Wyoming based consulting corporation she founded. She serves as spokesperson for and President of SDSBT a citizens group.