

Public Comments and BLM Responses on the Draft SEIS Federal Agencies

Comment Number **FA-1-1-AL-1**

Comment

EPA is concerned about the range of alternatives analyzed in the Draft SEIS. In addition to the No Action Alternative, the Draft SEIS considered two similar action alternatives: both the Proposed Action and BLM's Preferred Alternative include development and production of up to 4,399 additional wells on approximately 12,275 acres by the year 2023. The Draft SEIS did identify a "Conservation Alternative" (page 2-38) and a "Reduced Pace of Development Alternative" (page 2-39) but did not analyze them in detail for various reasons. From EPA's perspective, the rationale presented in the Draft SEIS does not provide a sufficient basis for eliminating these from full analysis as reasonable alternatives. We, therefore, believe these alternatives warrant further consideration.

Response

In response to this and similar comments, the BLM has analyzed two additional alternatives in the Revised Draft SEIS.

Comment Number **FA-1-1-AL-2**

Comment

In addition, EPA recommends further refinement of the BLM's description and analysis of the "No Action" Alternative.

Response

Thank you for your comment.

Comment Number **FA-1-2-AL-3**

Comment

Given the magnitude of potential impacts to the environment, EPA recommends the BLM fully analyze at least one additional alternative that considers a development plan with the same number of total wells over a longer period of time.

Response

BLM created Alternative E in response to this comment.

Comment Number **FA-1-3-AQ-1****Comment**

In order to better understand these predicted ozone levels, the BLM may wish to consider conducting a more refined ozone modeling analysis prior to issuance of the Final SEIS.

Response

Thank you for your comment. The BLM believes that the data and analyses provided in the SDEIS and AQTSD are adequate for this impact assessment.

Comment Number **FA-1-4-W-1****Comment**

Given the abundant and unique wildlife populations within and around the PAPA, EPA recognized the significant challenge facing the BLM to proceed with the development of the project while protecting the indigenous and migratory wildlife species. Recognizing the wildlife management expertise of the U.S. Fish and Wildlife Service and the Wyoming Game and Fish Department, EPA encourages BLM to continue to coordinate with these agencies to identify and implement appropriate mitigation measures.

Response

BLM has continued to coordinate development with U.S. Fish and Wildlife Service and the Wyoming Game and Fish Department. Wyoming Game and Fish Department has coordinated with the Operators and BLM in development of Alternative D, the Alternative D Wildlife and Habitat Mitigation Plan (Appendix 9C in the Revised Draft SEIS), and Wildlife Monitoring and Mitigation Matrix (Appendix 10 in the Revised Draft SEIS).

Comment Number **FA-1-4-W-2****Comment**

EPA also recommends that BLM include and discuss any differences between the project's proposed mitigation measures and those recommended in the Wyoming Game and Fish Department's "Minimum Recommendations for Development of Oil and Gas Resources Within Crucial and Important Wildlife Habitats on BLM Lands", BLM's National Sage Grouse Habitat Conservation Strategy; and mitigation measures recommended by the U.S. Fish and Wildlife Service.

Response

BLM has set forth Standard Practices and Restrictions for the Pinedale Anticline Project Area in Appendix 4 of the revised Draft SEIS. The Operators have prepared a Wildlife and Habitat Mitigation Plan for Alternative B in Appendix 9A and prepared a Wildlife and Habitat Mitigation Plan for Alternative D in Appendix 9C. Criteria advanced by WGFD (Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats -

December 6, 2004) would categorize most of the current Pinedale Anticline Crest as an area of "Extreme Impact" with >16 well locations per square mile and >80 acres of well-field disturbance per square mile - whether in areas of crucial winter range (for pronghorn and mule deer) or areas of sage grouse leks, nesting and early brood-rearing habitats. As an area of "Extreme Impact", WGFD recognized that "habitat function is substantially impaired and cannot generally be recovered through management or habitat treatments." The WGFD recommends compensatory mitigation (including off-site or off-lease) to offset unavoidable impacts within the "Extreme" impact category. As noted in other responses to commenters, BLM can not legally require provisions for offsite mitigation. Mitigation measures developed by the Proponents applicable to Alternative D include an expected \$36 million for a mitigation and monitoring fund.

Comment Number **FA-1-6-AL-5**

Comment

The No Action Alternative for this project does not include the proposed additional natural gas development, nor does it provide information on impacts to all resources associated with the different rate of additional well development scenarios. Thus, the No Action Alternative is distinct from a Reduced Pace of Development Alternative and should not be considered equivalent.

Response

In response to this comment, BLM developed Alternative E.

Comment Number **FA-1-7-AL-6**

Comment

EPA believes, however, that a Conservation Alternative can be developed that incorporates some degree of flexibility to provide for these uncertainties as was done in the existing ROD (see discussion in Table 3 on well pad density and centralized production facilities (CPF) in the 2000 ROD.

Response

In response to this comment, BLM developed Alternative E.

Comment Number **FA-1-8-AL-7**

Comment

Considering the statements contained in the 2000 ROD about the substantive need for resource protection measures and considering the subsequent studies on wildlife impacts since the ROD, EPA recommends BLM consider full analysis of a Resource Protection Alternative or provide a sufficient and detailed explanation as to why such an alternative would be deemed unreasonable. This analysis would provide the BLM and the public with important information

regarding potential environmental impacts, including wildlife, and mitigation associated with this proposed action.

Response

In response to this comment, BLM developed Alternative E.

Comment Number **FA-1-9-AL-8**

Comment

Given the considerations detailed above, and the potential impacts to the environment and wildlife which may be mitigated with a Resource Protection Alternative and a Reduced Rate of Development Alternative, or some combination of the two, EPA recommends BLM broaden the alternatives selected for full analysis.

Response

In response to this comment, BLM developed Alternative E.

Comment Number **FA-1-10-AL-9**

Comment

EPA recommends the No Action Alternative and baseline analysis be revised to accurately reflect the 700 producing well scenario analyzed in the initial Pinedale Anticline EIS and implemented in the 2000 ROD

Response

BLM respectfully disagrees, the PAPA ROD allowed 700 producing pads.

Comment Number **FA-1-11-AQ-2**

Comment

We encourage BLM to use information from the Draft SEIS to craft a Record of Decision that mitigates the impact of emissions from the Pinedale Anticline and protects visibility in Class I and sensitive Class II areas.

Response

BLM is committed to mitigating impacts.

Comment Number **FA-1-11-AQ-3**

Comment

EPA also encourages BLM to work with the Wyoming Department of Environmental Quality, Air Quality Division (WDEQ-AQD) to ensure that visibility monitoring in the region adequately represents impacts of the project, such as by further enhancing the aerosol monitoring being added by the WDEQ-AQD at South Pass.

Response

Thank you for your comment. The BLM agrees that the enhanced monitoring would be of great value, and BLM will certainly support and use the relevant monitoring data.

Comment Number **FA-1-12-AQ-4****Comment**

In order to better understand these predicted ozone levels, the BLM may wish to consider conducting a more refined ozone modeling analysis prior to issuance of the Final SEIS.

Response

Thank you for your comment.

Comment Number **FA-1-13-AQ-5****Comment**

EPA recommends that BLM acknowledge uncertainty exists regarding ozone formation in the area and the Wyoming Department of Environmental Quality, Air Quality Division (WDEQ-AQD) is studying the problem.

Response

Text has been changed in the Revised Draft SEIS.

Comment Number **FA-1-13-AQ-6****Comment**

The WDEQ-AQD is working on a field project to investigate the causes of high ozone concentrations near the project area. EPA believes that BLM should take into account that this study might shed light on the role of emissions from oil and gas development in ozone formation.

Response

Text has been changed in the Revised Draft SEIS.

Comment Number **FA-1-14-AQ-7****Comment**

EPA recommends that BLM include material in the Final SEIS and ROD to ensure that adaptive management will be implemented in the event that monitoring or modeling show emissions from the Pinedale Anticline contribute to high ozone concentrations in the area.

Response

BLM is committed to mitigating impacts.

Comment Number **FA-1-15-W-2****Comment**

Given the results of these and other wildlife studies in the area, EPA encourages BLM to continue to coordinate with the U.S. Fish and Wildlife Service and the Wyoming Game and Fish Department to identify and implement appropriate mitigation measures in the Final SEIS and ROD.

Response

BLM has continued to coordinate development with U.S. Fish and Wildlife Service and the Wyoming Game and Fish Department. Wyoming Game and Fish Department has coordinated with the Operators and BLM in development of Alternative D, the Alternative D Wildlife and Habitat Mitigation Plan (Appendix 9C in the Revised Draft SEIS), and Wildlife Monitoring and Mitigation Matrix (Appendix 10 in the Revised Draft SEIS).

Comment Number **FA-1-15-AL-10****Comment**

As discussed above, EPA also supports full analysis of a Resource Protection Alternative for this project.

Response

Thank you for your comment.

Comment Number **FA-1-15-W-3****Comment**

EPA also recommends that BLM include and discuss any differences between the project's proposed mitigation measures and those recommended in the Wyoming Game and Fish Department's "Minimum Recommendations for Development of Oil and Gas Resources Within Crucial and Important Wildlife Habitats on BLM Lands", BLM's National Sage Grouse Habitat

Conservation Strategy; and mitigation measures recommended by the U.S. Fish and Wildlife Service.

Response

Criteria advanced by WGFD (Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats -December 6, 2004) would categorize most of the current Pinedale Anticline Crest as an area of "Extreme Impact" with >16 well locations per square mile and >80 acres of well-field disturbance per square mile - whether in areas of crucial winter range (for pronghorn and mule deer) or areas of sage grouse leks, nesting and early brood-rearing habitats. As an area of "Extreme Impact", WGFD recognized that "the function of an important wildlife habitat is essentially lost even though some animals may still be present within the project area. Seasonal use restrictions and intensive implementation of standard management practices and/or habitat mitigation options are still useful, however the impact cannot be fully mitigated within the project area. Off-site mitigation is necessary to maintain properly functioning biotic communities and sustainable land uses by creating or enhancing replacement habitats Off-site mitigation should be located within the same landscape unit." There are no recommendations that allow for adherence except recommendations for mitigation. As noted in other responses to commenters, BLM can not legally require provisions for offsite mitigation.

Comment Number **FA-1-16-W-4**

Comment

The 2000 Pinedale Anticline ROD indicates that "No information is currently available to suggest that waiving or modifying the seasonal constraints in the project area would not be detrimental to the resources the seasonal restrictions are intended to protect." Since issuance of the ROD, BLM has granted several exceptions to the seasonal restrictions and allowed year round drilling. If BLM has analyzed the impact to wildlife from these exceptions, EPA recommends the analyses be included in the Final SEIS along with any additional information that has been developed since 2000 that would support year round drilling.

Response

BLM has not conducted studies specifically to address effects of exceptions to seasonal stipulations on wildlife. However, there was an exception granted to University of Wyoming researchers to allow drilling within 0.25 mile of a sage-grouse lek during breeding and research on mule deer distributions that coincided with year-round drilling on crucial mule deer winter range following the decision records for the Questar Year-Round Drilling Proposal and the ASU Year-Round Drilling Demonstration Project. Results of all research conducted relative to year-round drilling have been included in the revised Draft SEIS. The results do not support year-round drilling as implemented in the past as a more effective mitigative alternative to seasonal restrictions, per se. The results of the mule deer study, however, support reduced traffic during winter that follows from installation of liquids gathering systems which were components of year-round drilling proposals.

Comment Number **FA-1-17-SW-1**

Comment

EPA suggests the Final SEIS clarify how the projected increased sediment yields are translated into projected compliance with Wyoming's narrative water quality standard for settle able solids, which states: "In all Wyoming surface waters, substances attributable to or influenced by the activities of man that will settle to form sludge, bank or bottom deposits shall not be present in quantities which could result in significant aesthetic degradation, significant degradation of habitat for aquatic life or adversely affect public water supplies, agricultural or industrial water use, plant life or wildlife."

Response

The text has been revised.

Comment Number **FA-1-18-SW-2**

Comment

To ensure adverse effects to surface water quality are avoided, EPA recommends the Final SEIS identify: 1) the target and the threshold of change from the target being used to determine compliance with the designated uses assigned to these waters; and 2) the level of effectiveness for the applicable BMPs; 3) and the process that will be used to ensure effective implementation and maintenance of those BMPs (i.e., monitoring of effectiveness and implementation enforcement). EPA suggests this information be linked to the Performance-Based Objectives included in Appendix E of the Draft SEIS.

Response

The BLM is currently addressing your comments through a cooperative process to more precisely define impacts to determine the proper application of mitigation, monitoring and BMP's. Until this process is complete, BLM will continue to engage Operators to improve operational procedures which are under BLM's jurisdiction.

Comment Number **FA-1-19-AH-1**

Comment

The Draft SEIS notes that a report by EcoAnalysts, Inc. (2005) concluded "... there has been no discernable change in ... invertebrate biology indices in 5 years up to the time," EPA recommends the Final SEIS provide more detail about this analysis as well as the general approach to and results of the monitoring conducted by the SCCD.

Response

This information has been made publicly available on the Pinedale Anticline Working Group website.

Comment Number **FA-1-19-AH-2**

Comment

At a minimum, EPA recommends the discussion should include information about the biological metrics or index used, the basis for their derivation and application, and level of precision by which these analyses are able to define thresholds that would avoid "significant degradation of habitat for aquatic life" under Wyoming's narrative standard.

Response

This information has been made publicly available on the Pinedale Anticline Working Group website.

Comment Number **FA-1-20-AH-3**

Comment

Once a target and threshold of change from the target have been identified, EPA recommends BLM implement a comprehensive water monitoring plan to ensure the BMPs and Performance-Based Objectives are successfully mitigating the impacts from increased sedimentation and the identified target is being met. At a minimum, we recommend that BLM establish a monitoring program in the most sensitive watersheds and the watersheds most likely to be impacted.

Response

BLM is working on the Regional Framework for Water Resources Monitoring Related to Energy Exploration and Development.

Comment Number **FA-1-21-SW-3**

Comment

EPA recommends BLM include a discussion of the surface monitoring program, any obstacles in implementing the program, and any monitored results in the Final SEIS.

Response

The text has been revised.

Comment Number **FA-1-22-PBO-1**

Comment

While BLM identifies a series of objectives and monitoring methods, EPA recommends this section be clarified in the Final SEIS to include: the intended outcome. The Performance-Based Objectives should be linked to a clear goal. When will the reclamation be considered a success and how will this be measured? BLM has identified the reclamation monitoring methods, but it appears unclear how success will be determined. A monitoring timeframe. EPA

recommends that the performance strategy identify a monitoring timeframe, including when the monitoring will occur, how often, and by whom. Funding - EPA believes that funding to implement the Performance-Based Objectives is also critical. EPA also recommends the Final SEIS describe consequences and action triggers should an objective fail to be met; and how BLM will document the progress and report to stakeholders.

Response

This section has been removed in the Revised Draft SEIS. Defined steps for air quality mitigation and wildlife mitigation should defined impacts be observed have been included in the Revised Draft SEIS. Reclamation success criteria varies with alternative. The Revised Draft SEIS and Alternative D also include a funding mechanism.

Comment Number **FA-1-23-AM-1**

Comment

In addition, the Final SEIS should report on the progress of the Adaptive Environmental Management program that was included in the 2000 Pinedale Anticline ROD. If BLM met obstacles in implementing the Adaptive Environmental Management program, EPA suggests the Final SEIS detail how these obstacles will be addressed and overcome with the future implementation of the Performance-Based Objectives.

Response

BLM has decided not to enumerate the obstacles it has faced in adopting Adaptive Management. The annual planning is designed to supplement and enhance the adaptive management process in cooperation with regulatory and land management agencies.

Comment Number **FA-1-24-WT-1**

Comment

EPA recommends the Final SEIS clearly describe and show the location, type and acreage of wetlands within the PAPA. This evaluation could be accomplished using aerial photography, soil surveys if available, and USFWS National Wetland Inventory mapping.

Response

It is not possible to accurately show the location, type and acreage of wetlands within the PAPA without wetland delineation surveys. Wetland surveys are conducted by the operators on a case-by-case basis if it is determined that wetlands may be impacted. To date, there are no impacts to wetlands in the PAPA other than those associated with linear facilities (i.e., pipeline and road crossings).

Comment Number **FA-1-24-WT-2**

Comment

In addition, EPA recommends this analysis include wetlands and riparian habitats occurring outside of the PAPA that may be impacted by activities undertaken within the PAPA during oil and gas development (e.g., sedimentation impacts, construction of supporting infrastructure and employee housing).

Response

Wetland policies fall under the purview of the U.S. Army Corps of Engineers. See Revised Draft SEIS.

Comment Number **FA-1-25-WT-3****Comment**

EPA recommends that the Final SEIS discuss BLM's approach to implementing federal wetland policies and legal requirements in the continued development of the PAPA.

Response

Federal wetland policies fall under the purview of the U.S. Army Corps of Engineers. Operators in the PAPA are required to deal directly with the Corps for disturbances in wetlands.

Comment Number **FA-1-25-WT-4****Comment**

In addition, EPA recommends the Final SEIS clearly explain how BLM will be mitigating the loss and disturbance of wetlands and streams within and adjacent to the PAPA.

Response

Wetland policies fall under the purview of the U.S. Army Corps of Engineers. See Revised Draft SEIS.

Comment Number **FA-1-26-WT-5****Comment**

To accurately address cumulative wetland impacts and the health of the New Fork and Green River watersheds, EPA recommends the Final SEIS identify approximately how many acres of wetlands were affected prior to 2000.

Response

Wetland policies fall under the purview of the U.S. Army Corps of Engineers. See Revised Draft SEIS.

Comment Number **FA-1-27-WT-6****Comment**

Table 3.20-1 identifies 13,482 acres of wetlands that occur within the PAPA. EPA is unclear if this acreage existed prior to oil and gas exploration in 2000 or is the estimate of wetlands that existed prior to any human disturbance within the PAPA. EPA suggests the Final SEIS provide clarification of this table.

Response

Wetland policies fall under the purview of the U.S. Army Corps of Engineers. See Revised Draft SEIS.

Comment Number **FA-1-28-WT-7****Comment**

The Final SEIS should state the percent of total wetland disturbance by 2023 in the PAPA. This could be done by using Table 4.18-2.

Response

Generally, except for linear facilities, the Operators avoid disturbance to wetlands in the PAPA. Surveys are conducted and if found, wetlands are avoided. It is not possible to predict the extent of future disturbances to wetlands in the PAPA.

Comment Number **FA-1-29-AQ-8****Comment**

We recommend that the Final SEIS encourage the project developers to participate in EPA's Natural Gas STAR.

Response

Thank you for your comment.

Comment Number **FA-1-30-PA-1****Comment**

Have the Operators identified the number and location of delineation wells that are necessary? If so, EPA suggests this information be included in the Final SEIS.

Response

This information has not been provided to the BLM and is generally not available. The Proponents commit to developing the field on less than 600 pads.

Comment Number **FA-1-31-PA-2**

Comment

Given the potential impacts to wildlife, EPA suggest the BLM consider advancement north (in DA-1) only after full site restoration and reclamation has been completed and is deemed adequate.

Response

Full site restoration could take many years to a decade to achieve. BLM has developed two additional alternatives to mitigate the impact to wildlife that would not be so restrictive.

Comment Number **FA-1-32-AQ-9**

Comment

EPA recommends BLM review the analysis that was contained in the DEIS to understand why the compression emissions were underestimated and to ensure that the NO_x will not be underestimated in this new analysis.

Response

BLM is committed to mitigating impacts.

Comment Number **FA-1-33-AQ-10**

Comment

EPA recommends the Final SEIS expand this section, incorporating at least a brief explanation of the likely effects of mitigation on near-field and in-field results for PM₁₀.

Response

The analysis shows that the NAAQS were not exceeded under any alternative without mitigation and mitigation would decrease any impact.

Comment Number **FA-1-34-AQ-11**

Comment

The footnote on modeled ambient concentrations of criteria pollutants is missing from Table 3.11-5. Please restore this footnote in the Final SEIS.

Response

Text has been corrected in the Revised Draft SEIS.

Comment Number **FA-1-35-AQ-12**

Comment

Please add the increments to Tables M-3 or M-4 or clarify whether BLM intentionally refers the reader only to the in-field and far-field results for SO₂ and PM₁₀ increments.

Response

This is due to the fact that in-field concentrations for these modeling scenarios are based on short-term construction activities only and do not reflect concentrations from all sources that would consume increment in the area.

Comment Number **FA-1-36-AQ-13**

Comment

Nevertheless, EPA recommends the Final SEIS disclose, at least qualitatively, what effect the mitigation in phases I and II might have on ambient concentrations of NO₂.

Response

Thank you for your comment.

Comment Number **FA-1-37-AQ-14**

Comment

EPA recommends BLM clarify how the data shown in tables M-4 and M-5 were selected.

Response

Text has been corrected in the Revised Draft SEIS.

Comment Number **FA-1-38-AQ-15**

Comment

EPA recommends BLM provide an interpretation of why, in the near field, the modeled annual concentrations of PM₁₀ never exceed the annual concentrations of PM_{2.5}.

Response

Short term concentration impacts were assumed to be highest for PM₁₀ and PM_{2.5} during well pad and access road construction which was the scenario modeled for the short term averaging periods. Annual average concentrations were assumed to be based on drilling activity rather than short term construction activity and therefore these runs were based solely on drilling activity and not construction activity, hence the same annual average concentrations for PM₁₀ and PM_{2.5} as all particulate in the drill rig diesel exhaust is assumed to be PM_{2.5}.

Comment Number **FA-1-39-AQ-16**

Comment

Please revise the reference concentration (FRS) for chronic inhalation of xylene from 430 to 100 µg/m³.

Response

Text has been corrected in the Revised Draft SEIS.

Comment Number **FA-1-40-AQ-17**

Comment

EPA suggest BLM make available to the public the annual air quality modeling developed by the Operators and include an annual report to stakeholders and the general public on their progress on the air quality mitigation.

Response

The BLM will consider making this report available to the general public and the PAWG.

Comment Number **FA-1-41-S-1**

Comment

To protect the sensitive soils in the Blue Rim Area, EPA recommends BLM consider aligning the pipeline corridor with existing roads as much as possible.

Response

The proposed pipeline corridors mostly follow existing pipeline corridors.

Comment Number **FA-1-42-G-1**

Comment

For each of the impacts analyzed, please clarify the cumulative impact analysis area. In particular does the cumulative impact analysis for wildlife include impacts from the adjacent Jonah Field Project Area?

Response

The cumulative impact assessment area is different for each resource. Activity in the adjacent Jonah Field Project Area was considered.

Comment Number **FA-1-43-T-1**

Comment

Please clarify the tables and traffic predictions in the Final SEIS.

Response

Table 4.4-2 has been revised in the Revised Draft SEIS.

Comment Number **FA-1-44-SW-1**

Comment

To reduce direct impacts to Colorado River endangered fish species as a result of surface water withdrawal, EPA suggests BLM explore using groundwater for pipeline testing and dust control rather than surface water.

Response

Thank you for your comment; however, the USFWS considers withdrawal of groundwater to also be depletion in the Colorado River system potentially affecting the Colorado River Endangered fish.

Comment Number **FA-1-45-W-5**

Comment

Given this proximity, EPA recommends the Final SEIS include discussion of sage grouse stipulations implemented in the Jonah Field.

Response

BLM's Preferred Alternative, Alternative D in the revised Draft SEIS, insures no surface disturbance within 0.25 mile of occupied sage-grouse leks, not within 3 miles of leks. Anticipated negative impacts to sage-grouse have been disclosed in the revised Draft SEIS.

Comment Number **FA-2-1-AQ-1**

Comment

The FS recommends the ROD specify and require mitigation measures at the onset of the project to prevent visibility impacts in the wilderness areas from all PAPA project emissions, such as phased development for this and future energy development projects.

Response

Both the Draft SEIS and the Revised Draft SEIS contain mitigation for visibility impacts.

Comment Number **FA-2-1-AQ-2**

Comment

The FS recommends the ROD specify that the performance goals and objectives include timeframes and mitigation milestones that demonstrate improved air quality and reduced cumulative impacts in wilderness areas in order to maintain clean visibility days and enhance quality of degraded days to: (1) comply with the Regional Haze Rule and (2) meet the PAPA SEIS mitigation goal of zero days of visibility impairment.

Response

Both the Draft SEIS and the Revised Draft SEIS contain mitigation for visibility impacts.

Comment Number **FA-2-1-AQ-3**

Comment

The FS recommends the final PAPA SEIS include the number of days equal to 1.0 deciview and add them to the number of days of impacts greater than 1.0 deciview as reported in the draft SEIS.

Response

The number of days greater than or equal to 1.0 deciviews has been reported in the DSEIS and will be reported in the FSEIS. A few maximum deciview values reported in the DSEIS were as 0.50 and 1.00 deciviews were incorrectly listed due to numerical rounding. This has been corrected for in the Revised Draft SEIS.

Comment Number **FA-2-1-AQ-4**

Comment

The FS recommends the ROD provide for the development of a long-term monitoring system and an action plan to meet or exceed the stated mitigation goals including incentives for exceeding the goals and consequences if the goals are not met. The ROD should be monitored

by periodically using the same air quality dispersion model, meteorological data, and input parameter used for the original analysis to ensure direct comparison of emission reductions.

Response

Thank you for your comment.

Comment Number **FA-2-1-AQ-5**

Comment

The FS recommends the ROD include provisions to annually track and report existing, approved, and project source emissions in the planning area.

Response

Although the emissions contribute to impacts, modeling and monitoring are contemplated in both the Draft and Revised Draft SEIS to determine effectiveness of mitigation.

Comment Number **FA-2-1-AQ-6**

Comment

To assess performance objectives, validate the model, and to help establish emission goals for protecting visibility the FS recommends the ROD provide for installation and long-term operation of an IMPROVE aerosol monitor near the Bridger Wilderness Area, where impacts from this project are most likely to occur.

Response

Thank you for your comment. The BLM agrees that the enhanced monitoring would be of great value, and BLM will certainly support and use the relevant monitoring data.

Comment Number **FA-2-2-AQ-7**

Comment

We urge continued work with partners to evaluate and consider implementation of other potential emission mitigation solutions such as electrification of the well field, slower paced development, voluntary emission offsets from existing sources (in-field or otherwise), and energy conservation and efficiency measures.

Response

Thank you for your comment.

Comment Number **FA-2-3-AQ-8**

Comment

The FS recommends a comparison of 2018 modeled ozone to monitored summer ozone for 2005 and 2006. From that comparison a factor should be developed to extrapolate winter monitored ozone to estimate future winter ozone levels. This comparison to monitored data should also be used to validate the CALGRID modeling results.

Response

Thank you for your comment. The BLM believes that the data and analyses provided in the SDEIS and AQTSD are adequate for this impact assessment. See the Revised Draft SEIS for additional ozone modeling analyses.

Comment Number **FA-2-3-AQ-9**

Comment

The FS recommends a smaller grid size (12 km MM5 is available) than the 36 km MM5 data used for the ozone modeling so that the highest predicted concentrations are accounted for in complex terrain.

Response

Please see the Revised Draft SEIS for additional ozone modeling analyses.

Comment Number **FA-2-3-AQ-10**

Comment

The FS recommends that the Final SEIS explain how deviations from the default settings used for the ozone modeling compare to results using the default settings.

Response

CALGRID model switch settings were determined based on the data sources used for this analysis. These settings are default values applicable for the Western Regional Air Partnership (WRAP) data files that were used. The use of the Carbon Bond IV (CB4) chemical mechanism, although not listed as the default in the CALGRID input file, is an approved chemical mechanism for this analysis.

Comment Number **FA-3-1-TE-1**

Comment

The Service believes that some water withdrawal plans may meet certain parameters and may no longer meet the definition of a depletion. However, the Bureau of Land Management (Bureau) must be prepared to demonstrate the timeframe, discharge point, and methods to

clearly show that there is no effect or a beneficial effect to Colorado River fishes. The Bureau should work with the Service to review the characteristics of this proposal in terms of the water usage and the Service will assist the Bureau in making a decision regarding whether a depletion exists.

Response

In the Revised Draft SEIS, there is no discussion of a beneficial effect due to produced water treatment and discharge. In the Biological Assessment, withdrawal of groundwater, produced water, and surface water is considered a depletion.

Comment Number **FA-3-2-AQ-1**

Comment

The Service recommends that the Bureau require that the Operators implement Tier 2 equivalent emission controls on 100 percent of the drilling rig engines as is required on the engines in the Jonah Infill Drilling Project (Jonah 2006).

Response

Impact mitigation is included in the Revised Draft SEIS.

Comment Number **FA-3-3-G-1**

Comment

Table 1.9-1 indicates that the Service's authority includes the Endangered Species Act. For clarification, the Service also provides recommendations for protective measures for migratory birds in accordance with the MBTA, BGEPA, Executive Orders 11990 and 11988, CWA, FWCA and the FWA.

Response

The table is not intended to be an exhaustive list.

Comment Number **FA-3-4-SW-1**

Comment

The Service recommends that the DEIS include the following additional information regarding the Anticline Disposal Facility: 1. The produced water handling capacity of the facility; 2. surfactants and other chemicals present in the wastewater stored at the facility; 3. concentrations of salts in the evaporation ponds; 4. measures implemented by the facility to prevent migratory bird mortality; and 5. if this facility will be capable of handling the additional volume of produced water generated during the development of up to 4,400 additional natural gas wells.

Response

The BLM does not have jurisdiction over the Anticline Disposal Facility. Methods for produced water disposal were contemplated in the Revised Draft SEIS.

Comment Number **FA-3-5-GW-1**

Comment

The DSEIS should provide data on metal, trace element and radionuclide concentrations in produced water if available from nearby existing natural gas wells to assess the probable water quality of produced water from the proposed wells.

Response

BLM has not collected this data to date because the produced water is disposed of at state-approved disposal facilities; however, BLM is working with other state and federal agencies to refine the monitoring program for water resources and any future data gathered may include this information if it is determine that it is needed.

Comment Number **FA-3-6-GW-2**

Comment

The Service recommends that the DSEIS provide information on the salinity of the water used for dust control and the potential or lack thereof for impacts to adjacent vegetation.

Response

Operators are required to gain approval from both the BLM and the WOGCC before using produced water for dust control on a lease basis. These requests are reviewed on a case-by-case basis and there are definite water quality standards, specific to vegetation, which must be met before approval is granted. Commercial operations engaged in produced water recycling and disposal operations are under the jurisdiction of the WDEQ. BLM has commented on those projects which occur on federal land where given the opportunity.

Comment Number **FA-3-7-SW-2**

Comment

The Service recommends that this section discuss the source of TDS in these drainages (i.e. natural, due to natural gas development, other causes, and or unknown).

Response

The BLM does not believe that determining the source of the TDS is necessary in describing the affected environment.

Comment Number **FA-3-8-SW-3****Comment**

The Service recommends that this section provide the following information: 1. The quantity and quality of produced water generated by the increased number of natural gas wells; 2. an assessment of hazards to migratory birds from the disposal of produced water into large evaporation ponds; 3. an assessment of other disposal options, such as deep-well injection, for produced water; 4. the quantity of produced water disposed of by deep well injection versus the quantity of disposed of by evaporation ponds; and 5. the number of additional produced water wastewater disposal facilities (with evaporation ponds) needed in the future to dispose of produced water.

Response

This information is provided in the Revised Draft SEIS.

Comment Number **FA-3-8-SW-4****Comment**

The DSEIS should assess the long-term salt concentrations in the evaporation ponds and whether the increased concentrations will pose a risk to migratory birds landing on these ponds.

Response

The BLM does not have jurisdiction over the Anticline Disposal Facility. Methods for produced water disposal were contemplated in the Revised Draft SEIS.

Comment Number **FA-3-8-SW-5****Comment**

Concentrations of surfactants in the produced water should also be assessed.

Response

Produced water is generally only exposed where birds may have access at WDEQ-permitted facilities. Produced water may also be accessed at reserve pits. Produced water may not be held in reserve pits for more than 90 days and measures are taken to prevent access to the reserve pits.

Comment Number **FA-3-9-TE-2****Comment**

The Service recommends that the Bureau consider how these goals will be met for sensitive species, such as greater sage-grouse with the amount of oil and gas development in the PAPA and a DSEIS that states "continued loss of habitat function is likely...under all alternatives."

Response

Continued loss of habitat function for greater sage-grouse and other sensitive species will continue with the additional alternatives in the Revised Draft SEIS though BLM expects that the following stated goals in their Sensitive Species Policy will be met statewide (under any alternative, wildlife habitats on the PAPA will not be functional), the goals follow:

- maintain vulnerable species and habitat components in functional BLM ecosystems;
- ensure sensitive species are considered in land management decisions;
- prevent a need for species listing under the ESA; and
- prioritize needed conservation work with an emphasis on habitat.

Comment Number **FA-3-10-TE-3**

Comment

The Service understands that although the BMP's are an important component of ensuring the continued recovery of the bald eagle, the Service reminds the Bureau of their obligation to analyze effects to bald eagles from actions on private land where those actions are interrelated and interdependent to actions on Federal lands. The Bureau may include the private land owner and/or the operator in their section 7 consultation under the Act but at a minimum the Bureau is obligated to inform the private land owner and the operator of their obligation to comply with the Endangered Species Act.

Response

At the time the comment was submitted, bald eagles were listed under ESA, though the species has been delisted (see discussion in the Revised Draft SEIS) since then and remains protected under the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act. USFWS recommended BMPs on private lands that are not within the BLM's jurisdiction and would be used voluntarily by the Operators. The BMPs apply to other raptor species as well as bald eagles and were designed to minimize adverse effects during development and would be continued even though bald eagles are no longer listed.

Comment Number **FA-3-11-TE-4**

Comment

To ensure that surveys are conducted only in areas where the likelihood of finding a black-footed ferret is high (e.g. those towns or portions of towns where densities of prairie dogs are moderate to high), the Service recommends that the Bureau and/or their designated representative contact the Service if prairie dog towns will be impacted to discuss survey needs.

Response

As noted in Chapter 3, 64 square miles in the PAPA are part of the Big Piney Prairie Dog Complex that would require surveys for black-footed ferrets. BLM has drafted a Biological Assessment that addresses conservation measures applicable to black-footed ferrets, including surveys for the species.

Comment Number **FA-3-12-TE-5**

Comment

The DSEIS states that the orchid has not been detected in the PAPA and there are no known occurrences in southwest Wyoming. Because there are known occurrences in northeast Utah as well as eastern Wyoming the Service recommends that the Bureau evaluate suitable habitat (i.e. seasonally moist soils and wet meadows of drainages below 7000 feet elevation) for possible occurrence of the orchid.

Response

BLM has drafted a Biological Assessment that addresses conservation measures applicable to Ute Ladies'-tresses orchid. Surveys for the species have and will continue to be conducted in suitable habitats.

Comment Number **FA-3-13-W-1**

Comment

The Service reminds the Bureau of the 2000 Memorandum of Understanding (MOU) it signed on to with the U.S. Forest Service and the U.S. Fish and Wildlife Service with the Western Association of Fish and Wildlife Agencies (WAFWA) to conserve the greater sage-grouse and its habitat.

Response

The Objectives of the 2000 MOU, to which BLM and WGFD were signatories, were: 1) to maintain, and increase, where possible, the present distribution of sage grouse, 2) to maintain, and increase, where possible, the present abundance of sage grouse, 3) to identify the impacts of major lands uses and hunting on sage grouse, and determine the primary causes for declines in sage grouse populations, 4) to develop a rangewide conservation frame work to provide for cooperation and integration in the development of Conservation Plans to address conservation needs across geographic scales as appropriate, and 5) to develop partnerships with agencies, organizations, tribes, communities, individuals and private landowners to cooperatively accomplish the preceding objectives. BLM does not believe that habitats on the PAPA with the existing level of development can meet Objectives 1 and 2 of the MOU.

Comment Number **FA-3-13-W-2**

Comment

This MOU outlined the participation of Federal and State wildlife agencies, including the Wyoming Game and Fish Department, in greater sage-grouse conservation, and these commitments should be considered in project planning in sage-grouse habitat.

Response

See response to Comment FA-3-13-W-1.

Comment Number **FA-3-13-W-3****Comment**

Additionally, unless site-specific information is available, greater sage-grouse habitat should be managed following the guidelines by Connelly et al. 2000 (also known as the WAFWA guidelines).

Response

BLM's Preferred Alternative, Alternative D in the Revised Draft SEIS, insures no surface disturbance within 0.25 mile of occupied sage-grouse leks. Anticipated negative impacts to sage-grouse have been disclosed in the Revised Draft SEIS.

Comment Number **FA-3-13-W-4****Comment**

The Service strongly encourages the Bureau to not authorize actions that may exacerbate greater sage-grouse declines on either a local or range-wide level.

Response

See response to Comment FA-3-13-W-3.

Comment Number **FA-3-14-W-5****Comment**

The Service recommends that flagging be excluded from consideration as a protective measure as it is ineffective at deterring birds from oil production skim pits and reserve pits.

Response

Included in Appendix 4 of the Revised Draft SEIS, any pits with harmful fluids in them would be maintained in a manner that would prevent migratory bird mortality.

Comment Number **FA-3-14-W-6**

Comment

The DSEIS should state that the pit would be covered with netting to prevent bird and other wildlife access if oil or sheens are present in the reserve pit.

Response

See response to Comment FA-3-14-W-5.

Comment number **FA-3-14-W-7**

Comment

The specific WOGCC regulation should be included in this section: "Reserve pits shall be completely fenced and, if oil or other harmful substances are present, netted or otherwise secured at the time the rig substructure has been moved from the location in a manner that avoids the loss of wildlife, domestic animals, or migratory birds."

Response

Included in Appendix 4 of the Revised Draft SEIS, any pits with harmful fluids in them would be maintained in a manner that would prevent migratory bird mortality. The following WOGCC Rules will be included in Appendix 4: WOGCC Rule Chapter 4, Section 4 a(vi) states that, at a minimum, the owner or operator must unless otherwise approved by the Supervisor: "Provide fencing or other reasonable means to prevent access to all pumps, pits, wellheads, production facilities which is reasonably adequate to secure the site in such a manner as to protect public health and safety concerns, wildlife, and livestock at the well location". Chapter 4 Section 1 (bb) states: "Reserve pits shall be completely fenced and, if oil or other harmful substances are present, netted or otherwise secured at the time the rig substructure has been moved from the location in a manner that avoids the loss of wildlife, domestic animals, or migratory birds. Because of the same concerns, produced water pits must be fenced and, if oil or other harmful substances are present, netted or secured in such a manner as to provide protection to wildlife, domestic animals, or migratory birds. The Commission recommends netting as the preferred means of securing pits. See Appendix A for information relative to the Migratory Bird Treaty Act. Owners or operators shall provide for devices on hydrogen sulfide flare stacks to discourage birds from perching. The Supervisor may make additional requests for security when operations are conducted in close proximity to residences, schools, hospitals, or other structures or locations where people are known to congregate. "

Comment Number **FA-3-15-W-8**

Comment

The DSEIS should assess whether if the storage of fracture fluid additives in pits or open tanks would pose a hazard to migratory birds or other wildlife.

Response

The Revised Draft SEIS has addressed the potential for impact by fluid storage in open pits.

Comment Number **FA-3-16-W-9****Comment**

This section should specify that fluids containing oil or oil-based products will be removed as soon as possible from the reserve pits after well completion to prevent migratory bird mortality or the reserve pit will be closed.

Response

Included in Appendix 4 of the Revised Draft SEIS, any pits with harmful fluids in them would be maintained in a manner that would prevent migratory bird mortality. Also see response to FA-3-14-W-7.

Comment Number **FA-3-16-W-10****Comment**

The DSEIS should state that if fluids containing oil or sheens cannot be removed from the reserve pit, then the pit will be covered with netting to prevent bird and other wildlife access.

Response

See response to Comment FA-3-14-W-5.

Comment Number **FA-3-17-W-11****Comment**

This section states as produced water production declines smaller tanks may be used to accommodate the reduced storage requirements. This should be reworded to state that smaller closed-top tanks will be used to store the produced water.

Response

Under Alternatives B, C and D, the liquids gathering system that has already been installed within Questar's leases would be continued. A liquids gathering system would be installed in the central and southern portions of the PAPA eliminating the need for high profile storage tanks at each well pad. In addition to condensate, the liquids gathering system would also remove produced water, eliminating a need for storage tanks at each well pad.

Comment Number **FA-3-18-W-12****Comment**

We recommend that the Bureau consider the direct and indirect impacts of intense and perhaps year-round development over the entire PAPA especially areas of importance to wildlife.

Response

The Revised Draft SEIS provided direct and indirect impact analysis.

Comment Number **FA-3-19- W-13**

Comment

The Service is concerned that sagebrush habitats will not be restored at or near pre-disturbance quality.

Response

In the PAPA EIS of 2000, BLM recognized the difficulties in re-establishing sagebrush. In Section 4.16.3.1 of the Revised Draft SEIS, BLM stated that the continued direct impact to sagebrush and other native vegetation types is expected under each Alternative due to removal of vegetative cover and the long re-growth timeframe of shrubs. BLM shares the concern raised by the comment and realized that restoration of sagebrush habitat will take some time.

Comment Number **FA-3-20-PA-1**

Comment

The Service recommends that the SEIS clarify why each well will require daily visits when remote monitoring is in place.

Response

This is required to maintain operational safety.

Comment Number **FA-3-21-RC-1**

Comment

Because oil and gas development is a temporary use of public lands, the Service recommends that the Bureau conduct some portion of the reclamation monitoring to ensure that it meets with the Bureau's objectives for fish and wildlife resource needs and multiple use needs.

Response

There will be a reclamation plan including monitoring to meet BLM objectives. The objectives will be based upon criteria reflecting the plant community in undisturbed areas adjacent to the actual disturbance. The criteria will reflect the diversity and cover of the pre-disturbed plant community. These plans will be submitted to the BLM annually for BLM review and concurrence.

Comment Number **FA-4-1-C-1****Comment**

We appreciate BLM's straightforward and comprehensive discussion of the effect that the various alternatives would have on National Historic Trails. However, we strongly disagree with BLM's position that mitigation measures have been or will be identified that would downgrade that "significant degradation" to the level of "no significant impacts."

Response

BLM agrees with you that the National Historic Trail affected by the SEIS would suffer diminished integrity and character. BLM will continue to mitigate impacts to the Trail, its setting and associated resources and look forward to working with your offices in this joint effort.

Comment Number **FA-4-1-C-2****Comment**

While mitigation would reduce the degree of impact, it would not eliminate them to that level, and the impacts, in our judgment, would still diminish the historic integrity and character of the National Historic Trails.

Response

See response to Comment C-1, above

Comment Number **FA-4-2-C-3****Comment**

We are particularly concerned about project impacts within the quarter-mile buffer zone on either side of the trail.

Response

The figures describing impacts within the ¼ mile NSO for the Lander Trail as they appeared in the Draft SEIS were prepared in error and more accurate figures will be provided in the Final SEIS and ROD.

Comment Number **FA-4-3-C-4****Comment**

Specifics are not provided, but one public education measure commonly employed as mitigation is that of developing and installing wayside exhibits and trail markers. Where the impact on

historic trail seems slight or moderate, that measure might be satisfactory, due to the lack of better options.

Response

BLM agrees that only a limited number of wayside exhibits and signs can be employed for mitigation of impacts along the Lander Trail. BLM will continue to work with your office, the OCTA and other interested parties to identify and implement more innovative mitigative projects. Such projects might include a Lander Trail website, the Lander Trail streaming video monitoring system, or historic archaeological excavations of Lander Trail associated campsites, to suggest a few.

Comment Number **FA-4-3-C-5**

Comment

In the Pinedale area, installation of more wayside exhibits will not compensate for the increased number of wells, expansion of the size of well pads and resulting disturbed acreage, and disturbance within the trail corridor, which will significantly degrade important segments of National Historic Trails and their setting.

Response

See response to Comment C-4, above

Comment Number **FA-4-4-C-6**

Comment

The SEIS suggests that other mitigation measures yet to be developed will help to diminish the adverse effects of the proposed alternative on National Historic Trail. It seems unlikely that truly satisfactory new measures will be identified. Trail managers and administrators have struggled with these issues for decades, and have yet to identify widely accepted solutions other than avoidance and locating development out of view.

Response

See response to Comment C-5, above. Another alternative is to absorb Adverse Effect determinations along the Lander Trail; however BLM is committed to identifying and implementing innovative Lander Trail mitigation projects.

Comment Number **FA-5-1-W-1**

Comment

Recent research has documented declines in mule deer populations and impacts to pronghorn habitat use from gas field activities. Despite these negative trends the Draft SEIS calls for further development, but provides no assurances that certain population levels of these species will be maintained throughout the development process.

Response

In Section 4.20.3.1 of the revised Draft SEIS, recent research on impacts to mule deer and pronghorn has been disclosed but effects have been generally confined to local populations inhabiting the PAPA, not to populations at the herd unit level. Nevertheless, the revised Draft SEIS acknowledges that "lost habitat and diminishing habitat function may eventually lead to population declines (pronghorn) but such demographic response to impact would probably occur after some time has elapsed." Also, "there is potential for a declining population (mule deer), given a time lag between lost habitat effectiveness and function and a population-level response." Population declines at the herd unit level are possible and should be detected during monitoring proposed in the Wildlife Monitoring and Mitigation Matrix (Appendix 10 in the Revised Draft SEIS).

Comment Number **FA-5-1-W-2**

Comment

The proposal does not identify population or habitat thresholds or trigger points for pronghorn and mule deer that would signal a need for change in well field development (either temporally or spatially).

Response

Thresholds have been established in Alternative D and in the Wildlife Monitoring and Mitigation Matrix (Appendix 10 in the Revised Draft SEIS), but whether triggering an immediate reduction in drilling is a feasible option remains to be seen.

Comment Number **FA-5-1-W-3**

Comment

We are concerned that additional impacts could initiate further declines that could lead to the eventual loss of pronghorn and mule deer from GTNP and the surrounding area.

Response

Cumulative Impact Analysis Areas (CIAA) applicable to wildlife vary by species and are described in Section 4.20.4 of the revised Draft SEIS. The CIAA for pronghorn includes the northern portion of the Sublette Herd Unit while the CIAA for moose and mule deer are the respective species' herd units in their entirety. BLM recognizes that cumulative impacts have occurred to the pronghorn and mule deer populations (sub-populations) that inhabit the PAPA and acknowledges in the revised Draft EIS that implementation of all Alternatives would impact pronghorn and mule deer.

Comment Number **FA-5-2-W-4**

Comment

The benefit of staged development to wildlife hinges on the success of reclamation and revegetation efforts. It is not clear in the proposal if reclaimed areas would need to meet certain habitat objectives before development of new areas could occur or if intact core areas of crucial ranges would remain available to wildlife throughout the development process.

Response

Reclamation plans for all Alternatives are provided in Appendices 8A through 8D in the revised Draft SEIS while Wildlife and Habitat Mitigation Plans for the various alternatives are provided in Appendix 9A through Appendix 9C. No decisions have been made about which plan(s) will be implemented.

Comment Number **FA-5-2-W-5****Comment**

We support continued research and monitoring to identify critical trigger points and evaluate the success of reclamation efforts and effectiveness of mitigation measures intended to benefit wildlife. We strongly encourage that data and information from these studies be used to adapt development plans in space and time to ensure that resource impacts are minimized.

Response

In Section 2.4.2.1 of the revised Draft SEIS, the BLM has defined Adaptive Management that would be implemented by the BLM Authorized Officer. Only Alternative D includes a Wildlife Monitoring and Mitigation Matrix that would trigger specific Adaptive Management responses based on monitoring information.

Comment Number **FA-5-3-AQ-1****Comment**

While the BLM examined the impacts of atmospheric deposition on sensitive lakes within the wilderness areas, it did not look at national park areas for this analysis. Nitrogen and sulfur deposition are causes of concern for sensitive lakes in the national parks in northwest Wyoming. In Grand Teton National Park several lakes, particularly Delta, Surprise, Amphitheater, Mica and Lake Solitude have all been identified as being acid sensitive and should have been included in the analysis.

Response

The lakes identified for inclusion in the modeling analyses were determined during stakeholder protocol reviews, which included representation for the BLM, WDEQ, EPA, NPS, and USFS. The lakes were not identified during the protocol development or at anytime during the analyses, and subsequently were not included.

Comment Number **FA-5-3-AQ-2**

Comment

Visibility monitoring should be required, especially at Grand Teton National Park. An IMPROVE monitor should be funded and installed at Grand Teton National Park to track visibility impacts. The recommended location for the monitor is in the southern part of GTNP, where air masses from the project area might impact park views.

Response

Thank you for your comment. The BLM agrees that the enhanced monitoring would be of great value, and BLM will certainly support and use the relevant monitoring data.

Comment Number **FA-5-4-AQ-3**

Comment

Modeled cumulative NO_x emissions suggest that it would also be advisable to monitor nitrogen inputs to the GTNP, particularly at high elevations. Recommended monitoring would include: NADP/NTN wet deposition to be located near Moose, WY, with access to line power - monitoring of total deposition at high elevation stations in the alpine using resin exchange columns.

Response

Thank you for your comment. The BLM agrees that the enhanced monitoring would be of great value, and BLM will certainly support and use the relevant monitoring data.

Comment Number **FA-5-5-R-1**

Comment

We recommend you consult directly with the official who administers the L&WCF program in the State of Wyoming to determine any potential conflicts with section 6(f)(3) of the L&WCF Act (Public Law 88-578, as amended).

Response

Thank you for your comment.