March 14, 2007

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Pinedale RMP/EIS
ATTN: Kellie Roadifer
Bureau of Land Management, Pinedale Field Office
P.O. Box 768, 432 E. Mill St.
Pinedale, WY 82941

Dear BLM,

I am submitting my comments regarding the Supplemental Environmental Impact Statement regarding the Pinedale Anticline as a landowner living immediately adjacent to the Anticline. While I am also a member of the PAWG Water Task Group, my comments do not in any way reflect the consensus of the Task Group, they are solely my own.

The following is the BLM mission statement taken directly from BLM CD that was mailed to me.

> **Mission Statement**
> It is the mission of the Bureau of Land Management to sustain the health, diversity, and productivity of the public lands for the use and enjoyment of present and future generations.

If the BLM truly believes and practices the principles embraced in this mission statement, then the only Alternative listed in the proposed EIS Draft would have to be Alternative 3, and none of the others that are proposed. As you stated in your Draft EIS, Alternative 3 is designed to analyze the impacts of providing the maximum level of environmental protection for all competing resources while allowing for the production of oil and gas resources. If you have taken the time to drive up onto the Mesa during the summer drilling season, you will quickly notice that the area looks more like an industrial park rather than a prime Mule Deer and Antelope habitat. Drilling pads that have already been completed leave barren, exposed mounds of soil with no vegetation. Evaporation ponds left after the drilling are not covered with netting so that waterfowl can easily fly in. If you drive south on Highway 191 or 189 you can easily count numerous Deer carcasses next to the road do to the increased high speed traffic in the night hours from workers traveling to and from the work sites and Rock Springs and Evanston. If you hike up into the Wind River Mountains and look out across the valley towards the Wyoming Range, you now see a marked increase in haze that was not there 5 years ago, some of which, of course, is due to distant areas such as Salt Lake City. The above BLM Mission Statement is not being adhered to since the current development is causing declines in Deer populations, air quality, and the quality of life for those of us who enjoy the outdoors. What will future generations have? The pace of environmental destruction to this once

pristine area needs more sensitive management and stewardship, not increased unmitigated development.

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I-26-1

I-26-2

GW-1

I would like to see areas of concentrated development with reseeding and a thorough clean up before other areas are explored. While I oppose winter drilling due to disruption of wintering wildlife and the haze and inversions that diesel fumes create, if it is unavoidable, then drilling rigs and service trucks should run on clean burning natural gas instead of diesel. Careful attention to migration routes for deer and antelope should preclude development in those areas. I would also like to see more BLM and EPA inspectors hired to make sure that any environmental hazards are caught early before they can damage the aquifers, wildlife, or air quality. The efforts of Questar to use pipelines to remove condensate in order to decrease truck traffic should be commended and required by all operators. Stiff penalties for environmental spills or violation of agreed upon drilling practices should be instituted and enforced. Again, a much needed role for both BLM and EPA inspectors.

As a member of the PAWG Water Task Group and as a Board Certified Emergency Physician that deals with Toxicology issues on a regular basis, I am also concerned that the BLM and gas industry do everything possible to prevent contamination to the area's water supply. The fact that the operators are required to cement the well to a depth far below the upper aquifers is comforting. However, I am still uncertain that our current testing for TPH-GRO instead of the more expensive BTEX is a prudent practice. There were lengthy discussions in our meetings about the most appropriate testing and the consensus in the group was that TPH would be adequate. I was not entirely happy with this conclusion since my research on the issue led me to a Ministry for the Environment New Zealand web site that made the following comment regarding TPH testing: "TPH methods that do not use purge-and-trap or headspace analysis (eg, the New Zealand oil industry method) will not cover benzene or n-hexane, etc., because the extraction methods can involve loss of volatiles. The limitations of the analytical method should therefore be considered when interpreting the analytical results". My biggest concern is to make sure that Benzene, a potent carcinogen linked to leukemia, does not contaminate the drinking water of humans or livestock. The EPA in 40cfr141.32 have declared Benzene to pose a risk to humans at a level of only 0.005 parts per million. Ethyl benzene (at 0.7 ppm), Toluene (at 1 ppm), and Xylene (at 10 ppm) all pose a threat to Kidneys, Liver and the Nervous system of humans and animals. I would like to see at least a percentage of domestic wells tested for BTEX as the original BLM ROD so appropriately stated.

Sincerely,

Michael Kramer

Michael J. Kramer, MD, FACEP