

April 24, 2007

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

RE: Pinedale Anticline DEIS - Comment Letter

Dear Matt:

Thank you for the opportunity to submit comments on the Draft EIS for the Pinedale Anticline. Pursuant to the NEPA requirements to fully identify the range of possible impacts as well as mitigation alternatives, I respectfully request that the BLM perform additional analysis on the following three main areas:

### **Air Quality**

The predicted emission control strategy based on a gradual phase-in of Tier II technologies over the next 3-5 years still results in massive emission increases, locally and regionally. Operators have been aware of air emission issues for over a decade since the first Jonah Field ROD was issued in 1998. Additional time and notice is no longer necessary or appropriate to give operators time to consider new strategies. It is simply time to require the least emission strategies possible. I would request that the FEIS identify for the public the full range of emission control strategies that are technically available and feasible, regardless of cost, that would result in zero new emissions. It is appropriate to identify the cost to industry, but it is more important to acknowledge that zero emission strategies are available and implemented at other oil and gas developments. These strategies could be regional in nature and include offset trading and renewable energy substitutes for local electricity generation. The strategies should focus on zero emissions of greenhouse gases, as well as the emissions that contribute to the acid rain precursors that are now being identified in the high alpine lakes of the Wind River Mountains. I would then hope that the ROD would include a specific and enforceable time table to implement emission control.

### **Wildlife**

While the DEIS identifies a potential 3:1 acreage offset that might eventually be required some time in the future to mitigate impacts on wildlife, I would ask the BLM to include in its analysis the identification of specific areas that need to be protected in order to provide adequate substitute habitat for the wildlife, including but not exclusive to big game and sage grouse. Maps should identify equal or superior habitat types, especially for big game critical winter range and sage grouse brooding areas, with the intent that the ROD will require protection of these offset areas as conditions for future drilling permits. In order to facilitate this surface protection, the FEIS will need to identify and include a plan for unitization of the mineral interests on the Pinedale Anticline and

— AQ-1 —

I-25-1

— W-1 —

I-25-2

W-1 | I-25-2 | affected neighboring areas, in order to protect the property rights of the mineral owners in the area that may be impacted by curtailed surface activity.

**Socio-economic Impacts**

SE-1 | I-25-3 | The Wyoming Industrial Siting Act requires important socio-economic mitigation measures for similar impacts that are predicted in the Pinedale Anticline DEIS, but would be caused by a coal or trona mining operation, instead of an oil and gas operation. I would request that the BLM identify and include in the Pinedale Anticline FEIS these same mitigation requirements, even though it is an oil and gas operation. While BLM's enforcement, and the operator's adherence, would not be required under state law because of the industry's exemption from the act, the impacts are so severe as caused by the Anticline that a broader mitigation strategy is merited. It is unnecessary to reinvent the wheel because Wyoming's mining industry has shown that the Industrial Siting Act is quite sufficient in balancing the needs of impacted communities with industrial mineral development -- it is just necessary for BLM to identify and then enforce similar requirements for the oil industry -- especially for developments of the financial magnitude as the Anticline.

I hope that these suggestions are constructive and helpful to the BLM and operators as they face continued development of this valuable natural gas resource.

Sincerely,  
 Laurie D. Goodman  
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