

Public Comments and BLM Responses on the Draft SEIS Individuals

Comment Number **I-1-1-G-1**

Comment

Given industry's stance, it seems imperative that the BLM take a hard look at the direct, indirect, and cumulative consequences of the preferred alternative and impose strict conditions for the further development of the PAPA that will seriously address the threats to wildlife resources.

Response

This has been provided in the Draft SEIS and the Revised Draft SEIS.

Comment Number **I-1-2-W-1**

Comment

There is no mention in the draft of what will be done if these populations continue to decline - an apparent abandonment of the "adaptive management" concept which was the central theme of the 2000 PAPA ROD.

Response

See the Revised Draft SEIS, specifically Alternative D.

Comment Number **I-1-2-G-2**

Comment

There are no assurances that some level of development won't occur outside of the "core areas" and no mention of where "undeveloped blocks" will be or how large.

Response

See the Revised Draft SEIS, Alternatives D and E.

Comment Number **I-1-2-W-2**

Comment

There is no discussion of the precedent-setting implications of the removal of seasonal protections for breeding sage-grouse or wintering mule deer.

Response

Exceptions are allowed for in the Pinedale Resource Management Plan. The SEIS will be in conformance with the existing Pinedale Resource Management Plan.

Comment Number **I-1-3-M-1**

Comment

The mitigation of further significant and, quite probably, catastrophic impacts to mule deer and sage-grouse populations on the PAPA will require: (1) the periphery of the project are to be closed to new development until industry's core development areas have been fully developed and reclaimed; (2) the incorporation of specific mule deer and sage-grouse population thresholds that will trigger clearly defined adaptive management changes for the conservation of these species and their habitats near current levels on the project area; (3) maintenance of and strict compliance with seasonal stipulations for the protection of breeding sage-grouse and wintering mule deer.

Response

See the Revised Draft SEIS, Alternatives D and E.

Comment Number **I-1-4-W-3**

Comment

In light of the BLM's refusal to place any limits on the pace of development, it is vital that large undeveloped areas, population threshold limits and seasonal stipulations are explicitly incorporated into the proposed project.

Response

See the Revised Draft SEIS.

Comment Number **I-2-1-G-1**

Comment

Why is the supplemental impact statement adequate for a project with a 20 year drilling program and an extended production field life (60 years based on some charts in the SEIS)?

Response

See page 1-4 of the Revised Draft SEIS.

Comment Number **I-2-2-G-2****Comment**

How can a one-time document cover all direct and indirect effects and cumulative impacts from a prior development time frame?

Response

The SEIS provides an update on affected resources, change in development technologies and associated impacts.

Comment Number **I-2-3-G-3****Comment**

There should be a 10 year review period to see if plans need to be changed to meet other resource needs in the Pinedale Anticline Project Area in order to meet future standards and resource management.

Response

Adaptive management would be utilized to ensure that the appropriate data is available to make the appropriate review and support any changes needed in management actions.

Comment Number **I-2-4-G-4****Comment**

After a ROD is issued, what access is there for the public to comment on the project?

Response

It is anticipated that the PAWG would continue under all alternatives for this purpose.

Comment Number **I-2-5-G-5****Comment**

How does this plan change an area from wildlife habitat to industrial use only fit in the mission statement of the Bureau of Land Management?

Response

The various alternatives outline different methods for allowing for the productivity of the public lands to be utilized in the future while sustaining the health, diversity, and productivity of the lands.

Comment Number I-2-6-G-6**Comment**

There are citations in this document of previously required compliance documents that are not completed and allowed to expire; see cultural resource section.

Response

The commenter is correct.

Comment Number I-2-6-G-7**Comment**

Monitoring work designated in earlier working documents has not been carried out, resulting in no past data as a baseline and no reasonable penalty for non-compliance. It is stated that proposed funding did not come through; make it mandatory.

Response

Please see the Revised Draft SEIS.

Comment Number I-2-6-G-8**Comment**

Also, there are third parties delegated to do assessment work but it is not stated what the penalties are for non-compliance.

Response

Requirements in the Record of Decision become legally binding. Failure to comply with laws and regulations would result in enforcement actions as provided for by those laws and regulations which may be under the jurisdiction of another federal, state, or local governmental agency.

Comment Number I-2-6-G-9**Comment**

Who has actual oversight and enforcement powers to insure the best uses of the resources of the nation's property?

Response

Requirements in the Record of Decision become legally binding. Failure to comply with laws and regulations would result in enforcement actions as provided for by those laws and

regulations which may be under the jurisdiction of another federal, state, or local governmental agency.

Comment Number **I-2-7-G-10**

Comment

Granted that the federal government will receive revenues from a portion of the after-expenses profits, but what agency has fiduciary responsibility to ensure reasonable leaseholder costs and adequate payment to state and federal agencies?

Response

This comes under the purview of the WOGCC. The BLM has production and accountability technicians that track this information.

Comment Number **I-2-8-G-11**

Comment

What specific agencies can insure enforcement of regulations and require stricter regulations, if necessary, and what are the penalties for non-compliance by the leaseholders?

Response

Requirements in the Record of Decision become legally binding. Failure to comply with laws and regulations would result in enforcement actions as provided for by those laws and regulations which may be under the jurisdiction of another federal, state, or local governmental agency.

Comment Number **I-2-9-G-12**

Comment

What is the specified funding source to ensure that the legions of people working in federal and state agencies to complete required monitoring and reporting will be maintained over the life of the project?

Response

Please see the Revised Draft SEIS.

Comment Number I-2-9-G-13**Comment**

With the time table for exploration and development and the long production life of the field, who has the mandate to ensure compliance?

Response

Requirements in the Record of Decision become legally binding. Failure to comply with laws and regulations would result in enforcement actions as provided for by those laws and regulations which may be under the jurisdiction of another federal, state, or local governmental agency.

Comment Number I-2-10-MO-1**Comment**

Why not wait until the results of monitoring studies are in from these drilling projects before open the area to intensive drilling?

Response

Results of existing monitoring indicate that a change in the management of the PAPA is needed. To this end, five alternatives have been analyzed in the Revised Draft SEIS.

Comment Number I-2-11-G-14**Comment**

By what authority does BLM have the option to not follow its mission statement of BLM "to sustain the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations?" The alternatives B and C reduce the use of the surface area and habitat to just a base for supporting mineral extraction.

Response

The various alternatives outline different methods for allowing for the productivity of the public lands to be utilized in the future while sustaining the health, diversity, and productivity of the lands.

Comment Number I-2-12-WQ-1**Comment**

Given the plan to pull water from the Wasatch formation to supply drilling needs and the plan to reprocess water for reuse or disposal by in stream flow, the issue of water quality and availability needs to be tightly regulated and monitored.

Response

Discussion on the impacts has been disclosed in the Draft SEIS and the Revised Draft SEIS.

Comment Number **I-2-13-SW-1/WQ-2**

Comment

There needs to be a more rapid response or turn around time in water quality management than quarterly or yearly reviews. Surface waters need to be monitored to insure that production water by products do not seep from the buried liners and contaminate the subsurface soils and move into the water table used by humans, wildlife, livestock, and fisheries.

Response

Thank you for your comment. The BLM will continue to work cooperatively with the Operators and the State of Wyoming in monitoring of water resources.

Comment Number **I-2-14-GW-1**

Comment

What if the drought continues in western Wyoming and the recharge rate to subsurface flow is further reduced?

Response

If the drought continues, the rate of aquifer recharge decreases, and the outflow from the aquifers does not reduce accordingly, water tables will drop. Potentially the demand for fresh water should drop as more produced water is made available through desalinization. The BLM will continue to encourage the Operators to maximize the volume of water which is recycled and reused; thereby limiting the amount of new withdrawal.

Comment Number **I-2-15-GW-2**

Comment

There appears to be a conflict in the stated thousands of barrels of water required for each well exploration and development and the potential for ancient water in the gas producing geologic layers.

Response

The BLM is not aware of the apparent conflict contained in the comment.

Comment Number **I-2-16-GW-3/SW-2****Comment**

What if the Wasatch aquifer is not adequate and the secondary Fort Union Formation is also inadequate to provide water for drilling, would BLM allow an exemption for surface waters (streams, etc) to be diverted to meet needs or is there enforcement of the Colorado River Basin Water Resource requirements.

Response

This is outside the scope of the analysis. Surface water rights and use are not under the jurisdiction of the BLM.

Comment Number **I-2-17-AL-1****Comment**

Chapter 2 includes other alternatives that are not analyzed in detail but should be considered as valuable options.

Response

Please see the Revised Draft SEIS.

Comment Number **I-2-18-T-1****Comment**

The increased traffic on HWY 351 and HWY 191 have increased traffic accidents and made the road unsafe for driving at times of inclement weather or heavy truck traffic. Who will pay for repair and widening of the road as there are areas without safe shoulders at the current time?

Response

The impact of increased traffic has been disclosed so that the appropriate agencies can be informed and make take appropriate action to address these issues.

Comment Number **I-2-19-W-1****Comment**

I strongly suggest that surveys for black footed ferrets and suitable habitat be required before any leasing or work is done in the township and ranges cited in the SEIS.

Response

Thank you for your comment. Surveys will be conducted as required by the USFWS.

Comment Number **I-2-20-G-15****Comment**

How will BLM or any other supervising agency get reasonable and valid input by knowledgeable persons if it does not follow stated policy?

Response

The BLM does not consider the PAWG a waste of time. The input the PAWG provides to the BLM as well as the forum the PAWG provides for public discussion is valuable. The PAWG is expected to continue under all alternatives in the Revised Draft SEIS.

Comment Number **I-2-21-G-16****Comment**

What serious efforts will be made to develop public trust in stewardship of public lands for the best uses instead of just industry requests?

Response

Land use allocations are provided for in the Pinedale RMP. The BLM does not consider the PAWG a waste of time. The input the PAWG provides to the BLM as well as the forum the PAWG provides for public discussion is valuable. The PAWG is expected to continue under all alternatives in the Revised Draft SEIS.

Comment Number **I-2-22-G-17****Comment**

What if there are special measures need to be used in specific site situations that are not referenced in the Gold Book, which may be more applicable to usual situations.

Response

Please see the Revised Draft SEIS, Appendix E has been removed.

Comment Number **I-2-23-G-18****Comment**

What would be the enforcement policy and which agency has authority to require and monitor these unique situations?

Response

Please see the Revised Draft SEIS, Appendix E has been removed.

Comment Number **I-2-24-G-19****Comment**

There are other areas in the Rocky Mountain West that are undergoing oil and gas development, will there be specific regulations for the general area?

Response

This is outside of the scope of analysis of the SEIS.

Comment Number **I-2-25-G-20****Comment**

Are there plans for secondary and tertiary recovery techniques of the gas fields and how would those impacts be considered?

Response

Secondary and tertiary recovery is associated with oil production rather than natural gas production.

Comment Number **I-2-26-AL-2****Comment**

This SEIS for the Pinedale anticline oil and gas Exploration and Development Project is not adequate in that the 2 alternatives presented seriously impact the area in short and long term with direct and indirect impacts that are not well thought out or funded during the life of the project.

Response

Please see the Revised Draft SEIS.

Comment Number **I-2-27-G-21****Comment**

How does this project benefit the local community and national interest in public land management?

Response

Please see the Revised Draft SEIS.

Comment Number **I-3-1-SE-1****Comment**

We need to carefully reevaluate the EIS to include the protection of our educational environment.

Response

Impacts to the local communities have been disclosed in the Draft SEIS and the Revised Draft SEIS.

Comment Number **I-3-2-SE-2****Comment**

We are going through an evolutionary process here and in order for our standards of education to survive in fact, we need time to adapt to these changes. Please consider a phase development EIS to allow us to catch up to these escalating impacts.

Response

Please see the Revised Draft SEIS.

Comment Number **I-4-1-G-1****Comment**

What about the long-term impacts and why does the BLM proposal have to be such a massive increase in production?

Response

The proposal is a full-field development proposal based on the Operator's request and the number of pads needed to develop the PAPA.

Comment Number **I-5-1-G-1****Comment**

We all know extremely profitable gas extraction on the Jonah Field alone will last for more than 20 years, so why is the BLM even considering authorizing this drilling to extend up into our pristine mountains and to be allowed during the winter on the mesa?

Response

Please see the Revised Draft SEIS. Valid existing rights have been provided to the leaseholder to extract oil and gas resources. The Energy Policy Act of 2005 encourages production of domestic energy to meet our nation's energy needs.

Comment Number **I-5-1-W-1**

Comment

With so much at stake for our wildlife, and so little at stake for the gas companies, why rush this?

Response

Thank you for your comment.

Comment Number **I-5-1-AQ-1**

Comment

Why can't you force these companies to use 'green' engines that run on natural gas themselves? No fuel trucking would be needed, thus lessening the ecological footprint. And these engines run with much fewer emissions. We all see the new haze over our town, Mr. Anderson, and we all want something done about it.

Response

Impacts to air quality related values and mitigation has been developed for the Draft SEIS and the Revised Draft SEIS in cooperation with the State of Wyoming. The BLM recognizes the importance of the issue raised in your comment and will continue to work with the State of Wyoming in mitigating impacts.

Comment Number **I-6-1-GW-1/SW-1**

Comment

The text is littered with assumptions, many of them scientifically unsupported (e.g.: "no monitoring wells in the valley fill alluvium to provide accurate water quality information" p. 3-73; no "complete and verified list of wells in the PAPA and their construction and survey details" regarding quantity of groundwater used in drilling operations - p.3-73; no clear test for monitoring groundwater contaminations - p.3-76; no specific test for measuring total sediment loads for determining surface water quality - p.3-79; not enough samples collected to confirm stream health evaluations ranging from "fair to very good" p. 3-80; and fishery sample sizes which are "too small to allow population estimates" used, ironically, to produce fishery population estimates - p. 3-121).

Response

Groundwater and surface water monitoring programs will be redrafted after the issuance of the new ROD, by all participating regulatory agencies. This review will consider all comments received. In the interim, the number of wells monitored and the analyte suite have increased, and well survey data have been improved.

Comment Number **I-6-1-W-1/SW-2/RC-1**

Comment

Meanwhile, pertinent data that has been gathered seems to have been whitewashed or ignored when it substantiated the negative impacts caused from the current PAPA developments (e.g.: the 46% decline in deer populations; numbers of mule deer killed on US Hwy 191 and State Hwy 351 "do not appear to be related to traffic volume" {p. 3-111} when we just witnessed 22 pronghorn die in a single accident in mid January; declining population trends for greater sage grouse, moose, pronghorn antelope and mule deer, all of which utilize the PAPA for crucial range; the discrepancies in survival rates of pronghorn exposed to natural gas development, at 69.3%, versus those not exposed to development, at 95%, are deemed "not significant" p. 3-108; allocations that sedimentation and salinity have not been "significantly increased due to gas development to date", when 25% of the modeled sub-watershed prove to the contrary; and of course the infamous discrepancy between the projected and actual NO_x emissions levels).

Response

Information on the affected environment, including the impacts of the existing level of development has been disclosed in the DSEIS.

Comment Number **I-6-2-M-1/MO-1**

Comment

There needs to be clearly defined levels of what impacts will be tolerated (e.g.: air quality, water contamination, erosion, sedimentation of surface water, declines in game populations, etc.) and what penalties and mitigation measures will be imposed upon the Operators if these levels are exceeded.

Response

Please see the Revised Draft SEIS, which contains thresholds for air quality related values, and wildlife resources.

Comment Number **I-6-2-C-1/V-1**

Comment

The BLM needs to stick to its own guidelines as opposed to blatantly disregarding them (e.g.: an objective of MA-7 is protecting paleontological resources, and thus saw 590 acres of surface

disturbances p. 3-70; despite the County's prohibition of any structures in any floodway, the best the BLM can offer is "relatively little surface disturbance" p. 3-95; setting an objective for MA 1 to preserve the integrity of the Lander Trail and its Viewshed, then allowing 288 acres of disturbance thus far {p. 3-52} and another 1,304.4 acres of disturbances in store for the Viewshed p. 4-55).

Response

The amount of surface disturbance should not be equated with protection of resources. The BLM cannot prohibit surface disturbance on valid existing leases if the lease was issued with a No Surface Occupancy stipulation.

Comment Number **I-6-3-LS-1/RC-2/W-2**

Comment

Important changes I will expect to see made in the Final SEIS:
A temporary suspension of all leases held outside of the core development area until the core area has been completely drilled out and effectively reclaimed (this does not mean with noxious weeds).

Response

Please see the Revised Draft SEIS, specifically Alternatives D and E.

Comment Number **I-6-4-W-3**

Comment

An adherence to the Wyoming Game and Fish Department's "Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats" and subsequent establishment of thresholds for minimum game herds required for sustainability which, if reached, would trigger an immediate reduction in drilling until mitigation is achieved.

Response

Criteria advanced by the 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" - >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", the WGFD recognizes that "habitat function is substantially impaired and cannot generally be recovered through management or habitat treatments."

Comment Number **I-6-5-AQ-1/SW-3****Comment**

Clearly defined thresholds for air and water quality (adhering to WDEQ standards and those established in the Clean Air and Water Acts respectively) which, if reached would also trigger an immediate reduction in development levels until mitigation is achieved. An effective and comprehensive ongoing monitoring program must also be adapted to achieve these objectives.

Response

The BLM is required by law to adhere to State of Wyoming Air and Water standards. 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 BMPs. Until this process is complete, the BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

Comment Number **I-6-6-M-2****Comment**

A clear presentation of how off-site mitigation will actually occur, including such components as: source of financing; where the lands for the 3:1 mitigation proposal will actually come from and proof that these lands are of comparable value to the critical range lands which they are to be replacing; and the permanent protection from development of other areas key to wildlife sustainability such as sage grouse leks/nesting habitat and big game migration corridors.

Response

Please see the Revised Draft SEIS.

Comment Number **I-6-7-G-1****Comment**

Explicit requirements from the BLM for types of cleaner drilling techniques and deadlines for the utilization of these techniques.

Response

Please see the Revised Draft SEIS.

Comment Number **I-6-8-SE-1****Comment**

A slower pace of development to spread out economic benefits, allow for socioeconomic adaptations to, and responsible monitoring programs for drilling operations.

Response

Please see the Revised Draft SEIS.

Comment Number **I-6-9-M-3/RC-3**

Comment

A more extensive, more binding and more clearly defined approach to the performance standards described in Appendix C of the DSEIS must be created, with emphasis on emission mitigation measures and reclamation requirements.

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 predisturbed plant community.

Comment Number **I-6-10-SW-4/GW-2**

Comment

A clear account must be produced of the amount of surface and ground water used, and a limit set on what the allowable level of drawdown in the Wasatch Aquifer will be, with provisions to slow the level of development down if the recovery of the aquifer is not as rapid as predicted.

Response

Water quality and quantity are the purview of the State of Wyoming.

Comment Number **I-6-11-RC-4**

Comment

Proof of effective reclamation must exist for at least 75% of one MA before moving on to the next MA, and leaseholders must be bound to complete financial burden of reclamation costs, including the costs involved with thwarting the spread of noxious weeds which result from surface disturbances.

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 predisturbed plant community. These plans will be submitted to the BLM annually for BLM review and

concurrence. The BLM offers guidelines and leaves it up to the operators on how they accomplish the objectives.

Comment Number **I-6-12-AQ-2**

Comment

Class I Airsheds must be preserved under the Clean Air Act, which does not allow for the 65 days which are predicted to exceed the 1.0 dv threshold in these combined areas.

Response

Mitigation to reduce impacts to visibility were included in the Draft SEIS.

Comment Number **I-6-13-SW-5**

Comment

A clear plan must be established for how wastewater will be safely disposed of, without compromising soil quality.

Response

This is a WDEQ issue.

Comment Number **I-7-1-AL-1**

Comment

I must point out that in depth analysis of only one alternative - that offered by the group which will create significant impacts - without adequate consideration of other alternatives (either in the first PAPA ROD or this Draft SEIS) does not meet the BLM's obligation under the laws. I want to see consideration of all alternatives to the fullest extent possible.

Response

See the Revised Draft SEIS which includes Alternative E.

Comment Number **I-8-1-G-1**

Comment

While attorneys might fight over whether these ancillary impacts are "reasonably foreseeable" as cumulative impacts, I would like to point out that to most normal folks it's about as obvious as the sun that the Jonah and PAPA projects will have far-reaching impacts to the physical environment of the entire basin-they drive everything that happens here. So why has the BLM adopted the pretense that the impacts are so narrowly confined?

Response

The impact analysis for direct, indirect, and cumulative analysis has been properly presented in the SEIS.

Comment Number **I-8-2-G-2**

Comment

The bottom line is that many of us feel that the county, Pinedale and particularly the environment are being severely and unnecessarily impacted simply because the scale and pace of drilling is so fast.

Response

Thank you for your comment. Based on scoping comments and public comments, the BLM understands the concerns.

Comment Number **I-8-3-W-1**

Comment

Why is there no consideration of the potential effect of wolves on mule deer or on the stresses to elk caused by growth? If wolves were enough of an influence to limit ungulate populations in a time where there was no development at all, what will happen in the future when the Basin is so much more heavily developed?

Response

As noted in the Revised Draft SEIS, there are elk seasonal ranges (Green River Herd Unit) that coincide with the PAPA but few if any elk occur there any longer, given the expansion and subdivision housing and businesses in the area. Wolves are highly unlikely to affect mule deer or elk in the PAPA or vicinity since they are now managed by the State of Wyoming as a predatory species in those areas and would likely be killed as allowed by state law (Title 11, Chapter 6 of Wyoming Statutes), administered by the Wyoming Department of Agriculture .

Comment Number **I-8-4-W-2**

Comment

One other question might be how the SEIS will directly affect both wolves and bears, and given that both have been listed under the ESA during the entire pendency of the EA and SEIS, it is a bit curious that the SEIS makes no meaningful discussion of the potential impacts, perhaps even just in terms of reduced carrying capacity, on either animal. Growth and a continued decline in the deer population may also increase the likelihood of livestock predation.

Response

Wolves and grizzly bears have been delisted.

Comment Number **I-8-5-AL-1**

Comment

So many of us wonder why it is that only the Operator's proposal (and its twin the BLM preferred alternative) is considered as an alternative when the impacts will fall in so many places and will be and already are felt by so many people? Why aren't there alternatives that reflect the needs of groups other than the Operators?

Response

Please see the Revised Draft SEIS.

Comment Number **I-8-6-PH-1**

Comment

So why does the SEIS focus so much on socio-economic impacts etc., when perhaps a bigger issue is public health and safety?

Response

Socioeconomic issues were identified during the scoping process.

Comment Number **I-8-7-AL-2**

Comment

The BLM has considered only one Real and Reasonable Alternative.

Response

The BLM has included two additional alternatives in the Revised Draft SEIS.

Comment Number **I-8-8-G-3**

Comment

These "significant new circumstances or information" alone compel the BLM to prepare an SEIS which contemplates impacts and alternatives that reflect these new significant circumstances and information - not just the "substantial changes in the proposed action" resulting from the Operator's proposal. See 40 C.F.R. 1502.9(c)(1)(i-ii).

Response

Significant new circumstances and new information is one reason to supplement an analysis which is not to be confused with the Purpose and Need of a Proposed Action.

Comment Number **I-8-9-AL-3**

Comment

The BLM has improperly attempted to restrict discussion of reasonable alternatives.

Response

The BLM has included two additional alternatives in the Revised Draft SEIS.

Comment Number **I-8-10-AL-4**

Comment

So, where does the BLM purport to consider a full range of alternatives?

Response

The BLM has included two additional alternatives in the Revised Draft SEIS.

Comment Number **I-8-11-AL-5**

Comment

So I must report that there appears to be no other NEPA documents, at least that remain valid in light of recent circumstances and information, which could be crabbed together with the SEIS to constitute a discussion of all reasonable alternatives "to the fullest extent possible. See 40 C.F.R. 1500.2.

Response

The BLM has included two additional alternatives in the Revised Draft SEIS.

Comment Number **I-8-12-G-4**

Comment

I would incorporate my earlier comments, which BLM has already accepted into the record.

Response

Noted.

Comment Number **I-9-1-GW-1****Comment**

Can BLM promise our underground H₂O won't be damaged?

Response

No. There is always a risk. At this point society has determined that the benefits of obtaining the hydrocarbon resource outweighs the risks of the potential negative consequences of extracting the hydrocarbon resource. All reasonable precautions will be taken to preserve the water resource but a 100 percent guarantee for total resource protection cannot be given. Water quality is the responsibility of the WDEQ. The goal of NEPA is to identify impacts and implement mitigation as necessary to maintain or exceed federal, state, and local standards, policies, and regulations.

Comment Number **I-10-1-LS-1/W-1****Comment**

Prohibit oil and gas leasing and development in environmentally sensitive areas. These include big-game migration corridors, bottlenecks, winter and transitional ranges, sage grouse nesting habitat, the Green and New Fork River corridors, and scenic Wind River and Wyoming Fronts and areas of critical environmental concern;

Response

This is beyond the scope of this analysis. Leasing decisions are made at the Resource Management Plan level.

Comment Number **I-10-1-G-1****Comment**

Delay the environmental analysis of new gas projects, such as the South Piney Gas/CBM Project until the RMP is complete.

Response

Thank you for your comment.

Comment Number **I-10-1-G-2****Comment**

Cluster oil and gas development in concentrated areas and fully reclaim them before developing any other gas fields such as new CBM wells in the foothills of the Wyoming Range;

Response

Valid existing rights have been issued allowing the leaseholder to develop oil and gas resources. The BLM cannot require the leaseholder to delay development once the lease has been issued. Leases must be developed within specified timeframes as outlined in the 43 CFR 3100.

Comment Number **I-10-1-AQ-1/WQ-1**

Comment

Protect the air and water quality of local communities and of adjacent mountain ranges.

Response

Mitigation to reduce impacts has been included in the Draft SEIS and the Revised Draft SEIS.

Comment Number **I-10-1-M-1/MO-1**

Comment

Adopt and strictly enforce meaningful mitigation and monitoring requirements.

Response

Please see the Revised Draft SEIS.

Comment Number **I-10-1-G-3**

Comment

Protect the rights of surface owners where the federal government owns the mineral rights underlying private lands.

Response

The minerals rights take precedent over other rights associated with the property including those associated with owning the surface; however, the mineral owner must show due regard for the interest of the surface estate owner and occupy only those portions of the surface that are reasonably necessary to develop the mineral estate. The surface owner is invited to attend and identify concerns at the on-site meeting. BLM requires a good faith effort that the Operator engages the surface owner in negotiations for obtaining a surface use agreement. That agreement includes surface owner agreement for access or waiver from surface owner agreement for access or agreement regarding compensation.

Comment Number **I-10-1-RC-1****Comment**

Require industry to reclaim all disturbed areas and provide sufficient bonds to protect taxpayers from cleanup and restoration costs.

Response

Please see the Revised Draft SEIS.

Comment Number **I-11-1-AQ-1****Comment**

The BLM must ensure that emissions and dust do not exceed federal limits, and, moreover, the state DEQ needs to do a better job of monitoring and control.

Response

Thank you for your comment. The WDEQ-AQD has jurisdiction over air quality.

Comment Number **I-11-2-W-1****Comment**

We are dismayed that the BLM has relaxed winter drilling restrictions in many areas. The Pinedale Anticline ought to have its winter drilling restrictions in place and enforced.

Response

Exceptions are allowed for in the Pinedale Resource Management Plan. The SEIS will be in conformance with the existing Pinedale Resource Management Plan.

Comment Number **I-11-3-MO-1/M-1****Comment**

It's time to slow down the pace of development in Sublette County, truly monitor and mitigate its impacts, and not simply allow industry to dictate the terms of development on public land.

Response

Thank you for your comment. Please see the Revised Draft SEIS.

Comment Number **I-12-1-AL-1****Comment**

The Pinedale Anticline SEIS does not contain adequate scoping alternatives to address the needs of the lands involved.

Response

Please see the Revised Draft SEIS.

Comment Number **I-12-2-T-1****Comment**

Surface disturbance needs to be minimized by requiring directional drilling, workforce bussing needs to be utilized to avoid the 5,000 white pickups driving back and forth all day as it is currently.

Response

Thank you for your comment. This is within the range of alternatives analyzed in the DSEIS.

Comment Number **I-12-2-RC-1****Comment**

The lower gas periphery needs to be explicitly closed to new development until the core development area has been fully developed and reclaimed.

Response

See the Revised Draft SEIS, specifically Alternatives D and E.

Comment Number **I-12-2-W-1****Comment**

Wildlife needs to be protected and accredited as an important of this ecosystem and abandonment of winter drilling stipulations ended. It was spelled out during the early stages of this project that winter restrictions would be enforced to protect wildlife.

Response

Exceptions are allowed for in the Pinedale Resource Management Plan. The SEIS will be in conformance with the existing Pinedale Resource Management Plan.

Comment Number **I-12-2-AQ-1****Comment**

Air quality needs to be clearly addressed also as the degradation of air quality is visually noticeable to the naked eye in this area due to oilfield operations.

Response

Mitigation to reduce impacts to visibility were included in the Draft SEIS.

Comment Number **I-12-3-W-2****Comment**

Adhere to the Wyoming Game and Fish Department's Minimum Recommendations...maintain seasonal restrictions; adopt practices that lessen habitat disturbance, such as directional drilling, clustered development, piping liquid wastes and remote monitoring; requiring habitat-enhancement projects that mitigate direct and indirect habitat impacts; a reduced number of wells and drill pads approved annually; whenever possible, not allowing development in identified wildlife migration corridors, in crucial winter range or near sage grouse leks.

Response

See Revised Draft SEIS where the BLM has included the suggested mitigation measures for the level of development currently on the PAPA.

Comment Number **I-12-4-G-1/RC-2****Comment**

Confine development to Concentrated Development Area.

Response

Please see the Revised Draft SEIS.

Comment Number **I-12-5-AM-1****Comment**

Thresholds for Adaptive Management Changes
The original 2000 decision for the Pinedale Anticline Project included adaptive management provisions and it is clear from the air and wildlife monitoring results that unanticipated impacts have ensued since then.

Response

The Revised Draft SEIS includes mitigation thresholds for air quality and wildlife.

Comment Number **I-12-5-AQ-2/W-3/MO-1**

Comment

Since this proposal would authorize significantly expanded drilling over two decades, it must include clearly define thresholds for air and wildlife impacts that, if reached, would trigger immediate reduction in development levels/pace or other actions. A comprehensive and ongoing monitoring program must also be required to support this adaptive approach.

Response

Please see the Revised Draft SEIS, which contains thresholds for air quality related values, and wildlife resources.

Comment Number **I-12-6-G-2**

Comment

Development in new areas should not be permitted until development in previously-disturbed areas has been fully reclaimed and ongoing disturbances minimized.

Response

Please see the Revised Draft SEIS.

Comment Number **I-12-7-M-1/RC-3**

Comment

The performance based standards approach as it is now described in this proposal fails to provide needed certainty and accountability. The measures in Appendix C of the Draft SEIS need to be made more binding (i.e. without phrases like "where applicable" or "if needed"), more defined, and more extensive. Emission mitigation measures and reclamation requirements must be spelled out more clearly, with set dates for compliance and mandated actions if not met.

Response

Please see the Revised Draft SEIS.

Comment Number **I-12-8-M-2****Comment**

If off-site mitigation is to be included in the Anticline infill project (as it was for the adjacent Jonah Infill), BLM must go further to ensure that such off-site mitigation at least in part includes the acquisition or permanent protection of important habitat from future energy development.

Response

Thank you for your comment. The BLM will consider this when it issues a decision.

Comment Number **I-13-1-SE-1****Comment**

Non-resident workforce numbers are not adequately analyzed in the DEIS.

Response

Please see the Revised Draft SEIS.

Comment Number **I-13-2-SE-2****Comment**

The effects on the current workforce shortages and are not adequately described.

Response

Chapter 3 of the Revised Draft SEIS discusses the tight labor market in the project area, the proposed project's employment needs, and the likelihood that non-resident workers are likely to fill some of the project-related jobs.

Comment Number **I-13-3-SE-3****Comment**

There is no discussion on the short-term or long-term effects to economic stability and economic diversity.

Response

Thank you for your comment.

Comment Number **I-13-4-SE-4****Comment**

Your stated impacts to the "LOCAL DEMANDS" section on Table 1 of Appendix F (page F-1) are utterly inaccurate.

Response

Please see the Revised Draft SEIS.

Comment Number **I-13-5-SE-5****Comment**

I find it extremely hard to believe that the proposed/preferred alternative will have no impact on the area population.

Response

The Revised Draft SEIS provides a range of estimated population increases under each alternative by year.

Comment Number **I-14-1-SW-1****Comment**

Recently, an analysis of their macro invertebrate data noted the presence of a worm that thrives in degraded habitats with high sedimentation and poor water quality. As additional sites are disturbed in Sublette through production, can we expect the presence of these types of worms to be found throughout the county?

Response

The latest macroinvertebrate data shows a decrease in the number of worms. The best that can be said is that it is a complex system that will require further study. To date, BLM has no evidence that these worms are associated with poor water quality. In regard to the association with fine sediments, the best that BLM can do is limit the amount of fine sediments generated from construction projects through the application of specific mitigation measures and BMP's and conduct monitoring for compliance on BLM-authorized projects.

Comment Number **I-14-2-WQ-1****Comment**

What will oil and well production do to water quality?

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 BMPs. Until this process is complete, the BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction. Laws and standards exist to maintain, and in some cases, enhance water quality.

Comment Number **I-14-3-AQ-1**

Comment

We all know about the poor air quality of Salt Lake City with their alerts for people with asthma and asking folks not to be outdoors. Will this become a reality for Sublette County?

Response

Elevated emissions levels within Sublette county resulting from PAPA sources would not be expected to cause poor air quality conditions near the levels occurring in a large urban area such as Salt Lake City. There are far less source emissions and more favorable meteorological conditions for dispersion of air pollutants.

Comment Number **I-14-3-AQ-1**

Comment

We all know about the poor air quality of Salt Lake City with their alerts for people with asthma and asking folks not to be outdoors. Will this become a reality for Sublette County?

Response

Elevated emissions levels within Sublette county resulting from PAPA sources would not be expected to cause poor air quality conditions near the levels occurring in a large urban area such as Salt Lake City. There are far less source emissions and more favorable meteorological conditions for dispersion of air pollutants.

Comment Number **I-15-1-SW-1**

Comment

BLM should establish a program to detect/monitor/resolve erosion and siltation caused by surface disturbance and transportation impacts.

Response

Thank you for your comment.

Comment Number I-15-2-GW-1**Comment**

BLM should halt additional oil and gas production until such time as an aquifer characterization study can be completed and relied upon to preclude water contamination in the issuance of further drilling.

Response

The State of Wyoming and the BLM are working on developing an aquifer analysis. There are legal considerations that prevent the total cessation of drilling activities at this time.

Comment Number I-15-3-GW-2**Comment**

BLM should establish a tracking program for produced water similar to that for hazardous materials with manifests for a chain of custody and detection system to trace the millions of gallons of produced water yet to be brought to the surface.

Response

Water quality and quantity are the purview of the State of Wyoming - WDEQ. All produced water is handled in accordance with state and federal regulations.

Comment Number I-16-1-G-1**Comment**

Wording like on page 2-33, top paragraph, 2nd line, work "may" should be "will" or "shall"; same elsewhere in SEIS where usage needs to be positive/stronger; on same page (2-33), top paragraph, last sentence (as related to intent stated on page 2-30, "Alternative-C Includes...", 3rd sentence, "Once and operator..." etc.) that states "Outside of the seasonably restricted periods, operators..." etc. seems confusing and may cause interpretation problems - maybe intent can be better stated as "Inside seasonally restricted areas, operators....could return to the pad..." etc., "Whenever seasonal wildlife restrictions are not in effect." and similarly elsewhere for wording "outside... periods" (maybe just change "periods" to "areas" and "outside to "inside") for clarity of intent.

Response

The BLM will strive to clarify the text throughout the document. Since the alternatives are a proposal, the use of the words "would", "could", "should", and "may" are appropriate. The use of the words "will" and "shall" are reserved for the decision.

Comment Number I-16-2-G-2**Comment**

Regarding Article 2.4.2.4, pages 2-29 to 2-37, progression of development for BLM/USGS core areas DA-2 and DA-3 (within DA progression limits development/wildlife-disturbance to a restricted 2-mile wide (S to N) area successively moving N/NW-ward from southern boundary of DA-1), a buffer area could be developed between these DA's (maybe including DA-4 too) to minimize wildlife disturbance (and later, similarly, assist reclamation) during /after development, by limiting such progression in each DA-2 and DA-3 (maybe DA-4 too) in the same manner as in DA-1 to the 2-mile wide S/N area moving N/NW from each southern boundary, concurrently, with the same conditions as described for DA-1, which would also limit development to disturbance, only, on one side of Newfork River at beginning/end of such progression periods for DA-2 and DA-3. Furthermore, along river development could be restricted to one quarter section during one time period to minimize disturbance to wildlife seeking water (maybe giving a 2-mile (+/-) E/W buffer too).

Response

Thank you for your comment. The issue regarding the movement of development is within the range of alternatives presented in the DSEIS.

Comment Number I-16-3-AQ-1**Comment**

Any resultant development from past/present/future plan/proposal/alternative/ROD/etc. should require immediately, BACT emissions control compliance before allowing any such development activities.

Response

BACT emission control compliance is under the jurisdiction of the WDEQ-AQD. The BLM will continue to work cooperatively with the WDEQ-AQD to mitigate impacts.

Comment Number I-16-4-G-3**Comment**

Considering all the functioning development/operational "details" within sections of both SEIS volumes, required/agreed to be following (including any revisions thereto), the BLM must commit significant/considerable person-power-hours to supervise/inspect and ensure compliance with such details...

Response

The BLM agrees. Please see the Revised Draft SEIS Alternative D, which would provide a funding source for monitoring.

Comment Number I-17-1-P-1**Comment**

That no vertebrate fossils are currently known from the area is not a reason for dismissal of the area; it is an artifact of prior inaccessibility and therefore lack of exploration.

Response

Thank you for your comment.

Comment Number I-18-1-G-1**Comment**

Please demonstrate consideration and accountability for the following: blatant disregard, after a long public hearing process, including PAWG recommendations, for the agreed "limit to surface disturbance and human activity" that could displace wildlife, including the nation's largest migratory herds of deer and antelope, including "winter home", also the home of a sizable population of sage grouse.

Response

Thank you for your comment. The BLM values to input and work of the PAWG. Please see Alternative E of the Revised Draft SEIS which contemplates limits on development densities as well as keeping seasonal restrictions.

Comment Number I-18-2-AQ-1/WQ-1**Comment**

Are there any health specialists on staff monitoring and evaluating air and water quality and producing needed full disclosures for the public?

Response

This is under the jurisdiction of the WDEQ-AQD.

Comment Number I-18-3-AQ-2**Comment**

Failure of stated commitments to monitor air quality, including nitrous oxides, BTEX, and other organic compounds.

Response

Monitoring is ongoing. Detections of hydrocarbons above MCL are under the jurisdiction of the WDEQ-WQD.

Comment Number **I-18-4-PH-1**

Comment

Concern regarding health problems linked to gas emissions.

Response

Thank you for your comment.

Comment Number **I-18-5-SW-1**

Comment

The disposal of toxic water from drilling being hauled and piped to where? Need full disclosure regarding "condensate" chemicals in pits and tanks.

Response

It is not possible to predict where produced water may be disposed, but such disposal is permitted by the WDEQ-WQD (private facility) or the WOGCC (disposal well) or sometimes in combination with the BLM.

Comment Number **I-19-1-T-1**

Comment

I am concerned that winter drilling activities on the Mesa will create a safety hazard on County Road 23-110. This road is too narrow....

Response

Thank you for your comment.

Comment Number **I-19-2-W-1**

Comment

I am concerned that actions which eliminate sage grouse stipulations from natural gas development, in the heart of the best sage grouse habitat in the world, may sway the USFWS to list the Greater Sage Grouse under the ESA the next time a petition to list is filed.

Response

Thank you for your comment. This is within the range of alternatives analyzed in the DSEIS.

Comment Number **I-19-3-GR-1**

Comment

I have three concerns over future development on the Anticline from a range resource and livestock grazing perspective. One, I support alternatives which reduce the amount of surface disturbance, because that is a direct loss of rangelands.

Response

Thank you for your comment. This is addressed in the Draft SEIS.

Comment Number **I-19-4-GR-2**

Comment

Second, I would ask that the BLM be more diligent in ensuring that cattle movement areas are not blocked off as a result of development activities.

Response

Based upon your comment, the BLM has developed management common to all to address the continued functionality of the drift.

Comment Number **I-19-5-GR-3**

Comment

I remain concerned that a rush of off-site mitigation efforts will pressure cattle use on the rest of the Mesa. I hope a great deal of thought and coordination will go into any off-site mitigation project.

Response

Please see the Revised Draft SEIS.

Comment Number **I-20-1-GR-1**

Comment

Page 2-2, section 2.2.2 Summary of Concerns: I do not believe this section summarizes the concerns that I brought forward in the scoping process. Specifically this section does not

address my comments as they relate to the grazing resource on the Mesa. My comments about the grazing resource were:

1. Reduce surface disturbance, because it results in direct loss of rangelands.
2. Restriction of cattle movement by gas development activities.
3. Mitigation measures could restrict cattle use on undeveloped areas of the Mesa.

Response

These concerns are captured in this and other resource sections. A complete listing of the scoping is provided in an appendix.

Comment Number **I-20-2-T-1/W-1**

Comment

Other comments not mentioned in the summary, but listed in my scoping letter:

1. Safety hazard on county road 21-110, due to increased winter use.
2. Elimination of sage grouse stipulations may force the USFWS to list the species under the Endangered Species Act, which has huge repercussions for all users of the public domain. I also could not find this comment in Appendix B, which leads me to believe that you have not addressed the consequences of a potential listing of sage grouse as a result of this project, or more specifically the precedent it will set.

Response

These concerns are captured in this and other resource sections. A complete listing of the scoping is provided in an appendix.

Comment Number **I-20-3-TE-1**

Comment

Page 2-23, section 2.4.2.3 Alternative B (The proposed Action), paragraph 4 states: "This would require temporary relaxation of stipulations where the CDA is active...during the seasonal restricted periods. This section should state what relaxation means. Webster says to make "less severe or stringent", but do you really mean elimination instead of relaxation. Be clear and truthful.

Response

Please see the Revised Draft SEIS.

Comment Number **I-20-4-GR-2**

Comment

Page 3-90, section 3.19.1: There is no mention of blockage of trailing corridors by pipelines still on blocks, but I have reported those instances to the BLM.

Response

Please see the Revised Draft SEIS.

Comment Number **I-20-5-GR-3**

Comment

Page 4-103, section 4.17.1 Scoping Issues. This section failed to capture my scoping comment on pipeline construction restricting cattle movement, but section 4.17.3.1 does discuss soft plugs for pipeline trenches.

Response

These concerns are captured in this and other resource sections. A complete listing of the scoping is provided in an appendix.

Comment Number **I-20-6-GR-4**

Comment

Page 4-106, section 4.17.3.3 states that there will be a significant impact to the grazing resource on the Mesa, which is where we have a grazing permit.

Response

Thank you for your comment.

Comment Number **I-20-7-CU-1**

Comment

Page 4-106, section 4.17.3.3 states that there will be a significant impact to the grazing resource on the Mesa, which is where we have a grazing permit.

Response

It is not possible to quantify the impact.

Comment Number **I-20-8-M-1/GR-5**

Comment

Page 4-108, section 4.17.5: This section lists the mitigation measures for the grazing resource impacts. Under the proposed action alternative mitigation measures provided by the operators in Attachments 1 through 4 in Appendix C would apply. Mitigation measures that apply to livestock operators (the grazing resource) are virtually non-existent. There should be a

mitigation section for the grazing resource...Since Attachment 4 was listed as mitigation for impacts to the grazing resource then the bullet points, on page c-34 Compensation for Impacts should apply to the grazing resource. Any mitigation fund which might be established by industry should have local ranchers on board, and with equal footing to the WGFD. Any mitigation fund should have an assigned percentage specifically for mitigating impacts to livestock producers in the PAPA.

Response

Please see the Revised Draft SEIS.

Comment Number **I-20-9-M-2/GR-6**

Comment

Components of a grazing resource mitigation section should include:

1. Annual coordination meetings (late march - early April) between industry and livestock operators
2. A mitigation fund which includes rancher involvement on the board, and monies set aside specifically for grazing mitigation.
3. On-site mitigation projects for the grazing resource.
4. Industry organized compensation program for livestock killed by traffic and development activities.

Response

1. The BLM will communicate with affected permittees, and encourages permittees to also coordinate with the Wyoming Department of Agriculture and Sublette County, as needed, regarding issues, concerns, needs, etc. associated with the PAPA.
2. Although the BLM supports such coordination, this is outside of the purview of the SEIS. Any such mitigation would need to be offered by the Operators.
3. On-site range mitigation projects are encouraged and planned for in the SEIS.
4. This is outside of the purview of the SEIS. Any such mitigation would need to be offered by the Operators.

Comment Number **I-20-10-TE-2**

Comment

Page 4-125, section 4.20: Scoping issues section does not include my scoping issues that eliminating sage grouse season stipulations could result in the USFWS listing the species under the Endangered Species Act. Further the SEIS did not evaluate the impacts that listing could have on all users of BLM lands in Sublette County and across the west.

Response

These concerns are captured in this and other resource sections. A complete listing of the scoping is provided in an appendix.

Comment Number **I-20-11-TE-3****Comment**

Page 4-139 and page 4-140, section 4.20.3.3: The SEIS states that sage grouse population declines are expected to be "more rapid and more extensive" than the under the no-action alternative. There is no analysis on what the projected extent of those declines is, or what those declines would mean to sage grouse in the Green River Valley.

Response

It is not possible to quantify the impact given the unique nature of the proposed development. A qualitative discussion is provided. Alternative E is provided in the Revised Draft SEIS to provide a comparison between the alternatives.

Comment Number **I-20-12-GR-7/M-4****Comment**

I believe the impacts to livestock operators have been under represented, and the mitigation measures to compensate for those impacts are non-existent. More emphasis needs to be placed into the document on the affects of mitigation projects to livestock permittees.

Response

Please see the Revised Draft SEIS.

Comment Number **I-20-13-M-5/SE-1****Comment**

I believe the BLM completely ignored the issue of mitigation for socio-economic impact to Sublette County from this project, including cumulative impacts from other gas projects....The stress on law enforcement, social programs, housing, day care, and other areas of the community need to be addressed by industry. Operators from other gas fields should be brought into this mitigation fund.

Response

Please see the Revised Draft SEIS.

Comment Number **I-20-14-TE-4****Comment**

The treatment of the sage grouse issue in the SEIS is inadequate, especially if actions in the SEIS threaten listing of the species.

Response

The BLM respectfully disagrees. The analysis of the impacts of the various alternatives is sufficient.

Comment Number **I-21-1-LS-1/RC-1/W-1**

Comment

A temporary suspension of all leases held outside of the core development area until the core area has been completely drilled out and effectively reclaimed (this does not mean with noxious weeds).

Response

Please see the Revised Draft SEIS, specifically Alternatives D and E.

Comment Number **I-21-2-W-2**

Comment

An adherence to the Wyoming Game and Fish Department's "Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats" and subsequent establishment of thresholds for minimum game herds required for sustainability which, if reached, would trigger an immediate reduction in drilling until mitigation is achieved.

Response

See response to comment I-6-4-W-3 and response to letter EG-9.

Comment Number **I-21-3-AQ-1/SW-1**

Comment

Clearly defined thresholds for air and water quality (adhering to WDEQ standards and those established in the Clean Air and Water Acts respectively) which, if reached would also trigger an immediate reduction in development levels until mitigation is achieved. An effective and comprehensive ongoing monitoring program must also be adapted to achieve these objectives.

Response

The BLM is required by law to adhere to State of Wyoming Air and Water standards. 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 BMPs. Until this process is complete, the BLM will continue to engage Operators to improve operational procedures which are under the BLM's jurisdiction.

Comment Number **I-21-4-M-1****Comment**

A clear presentation of how off-site mitigation will actually occur, including such components as: source of financing; where the lands for the 3:1 mitigation proposal will actually come from and proof that these lands are of comparable value to the critical range lands which they are to be replacing; and the permanent protection from development of other areas key to wildlife sustainability such as sage grouse leks/nesting habitat and big game migration corridors.

Response

Please see the Revised Draft SEIS.

Comment Number **I-21-5-G-1****Comment**

Explicit requirements from the BLM for types of cleaner drilling techniques and deadlines for the utilization of these techniques.

Response

Mitigation for AQRVs has been identified.

Comment Number **I-21-6-SE-1****Comment**

A slower pace of development to spread out economic benefits, allow for socioeconomic adaptations to, and responsible monitoring programs for drilling operations.

Response

Please see the Revised Draft SEIS.

Comment Number **I-21-7-M-2/RC-2****Comment**

A more extensive, more binding and more clearly defined approach to the performance standards described in Appendix C of the DSEIS must be created, with emphasis on emission mitigation measures and reclamation requirements.

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 predisturbed plant community.

Comment Number **I-21-8-SW-2/GW-1**

Comment

A clear account must be produced of the amount of surface and ground water used, and a limit set on what the allowable level of drawdown in the Wasatch Aquifer will be, with provisions to slow the level of development down if the recovery of the aquifer is not as rapid as predicted.

Response

Water quality and quantity are the purview of the State of Wyoming.

Comment Number **I-21-9-RC-3**

Comment

Proof of effective reclamation must exist for at least 75% of one MA before moving on to the next MA, and leaseholders must be bound to complete financial burden of reclamation costs, including the costs involved with thwarting the spread of noxious weeds which result from surface disturbances.

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 predisturbed plant community. These plans will be submitted to the BLM annually for BLM review and concurrence. The BLM offers guidelines and leaves it up to the operators on how they accomplish the objectives.

Comment Number **I-21-10-AQ-2**

Comment

Class I Airsheds must be preserved under the Clean Air Act, which does not allow for the 65 days which are predicted to exceed the 1.0 dv threshold in these combined areas.

Response

Mitigation for AQRVs has been identified.

Comment Number **I-22-1-AQ-1**

Comment

BLM must impose more stringent pollution impact limits that will be more effective in protecting Sublette County and the seven Class I air sheds surrounding Sublette County.

Response

Thank you for your comment.

Comment Number **I-22-2-AQ-2**

Comment

State regulators and Federal regulators were slow to address growing Sublette County air quality and visibility impacts by gas development from 2000 through 2004. Therefore, 2005 impairment levels are currently being proposed as the baseline. These levels must not be used in their entirety; a more relevant level might be 20% of those impairment levels.

Response

Mitigation for AQRVs has been identified.

Comment Number **I-22-3-AQ-3**

Comment

State and Federal regulators and BLM must abandon further sole reliance upon industry financed computer modeling as justification for disproved positive-outcome-based assertions that air quality and visibility impairments will improve.

Response

The BLM and the WDEQ-AQD will be involved in modeled runs. Absent industry funding, a new funding source would need to be found.

Comment Number **I-22-4-AQ-4**

Comment

BLM must direct operators to require TRC to use meteorological data and wind history from the closest federally operated observation station, which is the Big Piney Airport AMOS facility; current reliance upon B.P. America MET data is inappropriate given the vested interest of operators in the outcome.

Response

The BLM respectfully disagrees. The BP data was used to disclose near-field impacts within the project area and these data are adequate to disclose the impacts.

Comment Number **I-22-5-AQ-5****Comment**

BLM must contract an independent third party, fluent with CALPUFF, to review all switch setting and inputs applied by TRC for the purpose of certifying that all output predictions are in fact legitimate and scientifically defensible.

Response

Thank you for your comment.

Comment Number **I-22-6-AQ-6****Comment**

State and Federal regulators and BLM must exert more direct enforcement oversight with regard to use of well completion flaring.

Response

Thank you for your comment.

Comment Number **I-22-7-AQ-7****Comment**

State and Federal regulators and BLM must levy a requirement upon operators to undertake a life-of-project, instrument-based measurement and reporting program designed to collect actual emissions measurements from exhaust stacks of drill rigs and other combustion devices.

Response

Thank you for your comment.

Comment Number **I-22-8-AQ-8****Comment**

State and Federal regulators and BLM must cease using arguments that current actual emission as well as modeled emission are legal because they do not breach "PSD increments" and "ambient air quality standards." Local citizens do not accept the premise that we must accept the "brown cloud" because it has not yet exceeded legal limits nor consumed PSD increments.

Response

All NEPA analysis comparisons to the PSD increments are intended to evaluate a threshold of concern and do not represent a regulatory PSD consumption analysis. If the proposed

mitigation is implemented, the project will represent a net air quality benefit in the Pinedale region.

Comment Number **I-22-9-AQ-9**

Comment

BLM must slow the rate of gas field development until emissions reduction technology can catch up. To date, industry has implemented only limited emissions reduction methods while pressing for accelerated rates of drilling.

Response

Thank you for your comment. The BLM will consider this when issuing a decision.

Comment Number **I-23-1-W-1**

Comment

The SEIS suggests that drilling be in a core development area and the peripheral areas remain as for wildlife habitat. I could find no language that indicated that this would be enforced. Hence, there is no guarantee that important wildlife will be range will be maintained.

Response

See the Revised Draft SEIS, specifically Alternatives D and E.

Comment Number **I-23-2-W-2/VG-1**

Comment

The impact of development on other species of wildlife as well as plant life needs to be thoroughly understood before extensive escalated drilling. What levels need to be maintained to ensure continuity of existing wildlife and plant life?

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. The BLM believes that the process defined in Section 2.4.2.1 is appropriate to address uncertainty such as that expressed in this comment.

Comment Number **I-23-3-SE-1****Comment**

The socioeconomic section of SEIS is lacking examining in depth and breadth the potential impact additional drilling will have on such infrastructures as our schools, medical system, law enforcement and "sense of community".

Response

The Revised Draft SEIS discusses each development alternative's impacts on social and community services. Data limitations impede the quantified estimation of these impacts.

Comment Number **I-23-4-AQ-1****Comment**

The SEIS does not specify controls and binding mitigation to deal with the significant impacts on air quality.

Response

Mitigation for AQRVs has been identified.

Comment Number **I-23-4-AQ-2****Comment**

Strict guidelines for reducing pollution emissions must be established and rigidly enforced.

Response

Mitigation for AQRVs has been identified.

Comment Number **I-24-1-G-1****Comment**

Did anyone ever consider the changes that will come with the boom and bust ending?

Response

Please see the Revised Draft SEIS.

Comment Number **I-25-1-AQ-1****Comment**

Did anyone ever consider the changes that will come with the boom and bust ending?

Response

Mitigation for AQRVs has been identified.

Comment Number **I-25-2-W-1****Comment**

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 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 affected neighboring areas, in order to protect the property of the mineral owners in the area that may be impacted by curtailed surface activity.

Response

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, the BLM can not legally require provisions for offsite mitigation. Thresholds have been established in Alternative D, but whether triggering an immediate reduction in drilling is a feasible option remains to be seen.

Comment Number **I-25-3-SE-1****Comment**

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.

Response

The Revised Draft SEIS includes socioeconomic mitigation measures.

Comment Number **I-26-1-RC-1****Comment**

I would like to see areas of concentrated development with reseeding and a thorough clean up before other areas are explored.

Response

Please see the reclamation plans in the Revised Draft SEIS.

Comment Number **I-26-1-AQ-1****Comment**

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.

Response

Thank you for your comment.

Comment Number **I-26-1-W-1****Comment**

Careful attention to migration routes for deer and antelope should preclude development in those areas.

Response

The BLM can not impose a no surface occupancy restriction once the lease has been issued. However, please see the Revised Draft SEIS.

Comment Number **I-26-1-G-1****Comment**

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.

Response

Thank you for your comment.

Comment Number **I-26-1-G-2**

Comment

The efforts of Questar to use pipelines to remove condensate in order to decrease truck traffic should be commended and required by all operators.

Response

Thank you for your comment.

Comment Number **I-26-1-G-3**

Comment

Stiff penalties for environmental spills or violation of agreed upon drilling practices should be instituted and enforced.

Response

Enforcement actions can be taken under existing laws and regulations.

Comment Number **I-26-2-GW-1**

Comment

I would like to see at least a percentage of domestic wells tested for BTEX as the original BLM ROD so appropriately stated.

Response

Please see Revised Draft SEIS.

Comment Number **I-27-1-G-1**

Comment

Language in the SEIS is too loose or vague...Remove such wording - "as necessary", "when practical", "here applicable", and "if needed".

Response

These words are included in Alternative B - which is the Proponent's Proposed Action.

Comment Number **I-27-2-W-1****Comment**

Lack of thresholds defined for prescribed adaptive management changes. There is a definite need for monitoring impacts to wildlife populations - including observed trends and habitat loss.

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 **I-27-3-W-2****Comment**

Not using WGFD's Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats"...It is a resource that should be used.

Response

Criteria advanced by the 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", the WGFD recognizes 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, the 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 **I-27-4-G-2****Comment**

I encourage you to pursue efforts to limit development to the concentrated development area.

Response

Please see the Revised Draft SEIS.

Comment Number **I-27-5-RC-1****Comment**

Reclamation should be done in an area immediately following full development and should occur before operators can move on to a new area.

Response

Thank you for your comment. This is within the range of alternatives analyzed in the Draft SEIS.

Comment Number **I-27-6-LS-1****Comment**

NSO leasing and non-leasing for unleased areas should be listed as off-sight mitigation options for operators.

Response

Please see the Revised Draft SEIS.

Comment Number **I-27-7-W-3****Comment**

Lack of detailed baseline inventory of habitats. This is important if there is a true desire to have successful reclamation and off-mitigation efforts. Without this baseline data, how will we know what the area should look like after development?

Response

Habitats were inventoried prior to the 2000 PAPA ROD and provide the environmental baseline used in the analyses within the revised Draft SEIS.

Comment Number **I-28-1-G-1****Comment**

Wouldn't it be a better management practice to keep drilling at a reasonable rate so that our other resources aren't so heavily damaged?

Response

Thank you for your comment.

Comment Number **I-28-2- W-1****Comment**

I appreciate the attempts of Alternative C to mitigate some of the drilling impacts, but it is not strict enough. It needs to keep seasonal drilling restrictions in place to protect what's left of our crucial winter wildlife range.

Response

Seasonal drilling restrictions are components of Alternative A (No Action) and Alternative E, both of which have been analyzed in the Revised Draft SEIS along with alternatives that allow year-round drilling and completions. The Revised Draft SEIS discloses impact but is not a decision-implementing document.

Comment Number **I-28-2- AQ-1****Comment**

Air quality guidelines must be strictly enforced with clearly defined consequences for violations.

Response

Enforcement actions can be taken under existing laws and regulations.

Comment Number **I-28-2- G-2****Comment**

Also, new wells and roads should be limited to areas in or immediately adjacent to the concentrated development area on the Anticline Crest.

Response

Thank you for your comment.

Comment Number **I-29-1-W-1****Comment**

The proposed SEIS does not have enough seasonal wildlife protection, nor does it set aside specific areas where wildlife will have protection from year-round drilling during migration, breeding and nesting seasons.

Response

The 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.

Comment Number **I-29-2-W-2**

Comment

Careful monitoring using the best available science and the professional opinion of wildlife biologists must be used to determine the amount of development to prevent further decline of mule deer herds, sage grouse and pronghorn.

Response

Monitoring has been established in the Operator's proposed Wildlife Monitoring and Mitigation Matrix (Appendix 10 in the Revised Draft SEIS).

Comment Number **I-29-3-G-1**

Comment

Air and water quality must be protected as well as protection of cultural resources that may be in the area.

Response

Thank you for your comment.

Comment Number **I-30-1-W-1**

Comment

I recommend that under all Alternatives, (A, B, and C) an analysis of night time lighting of development/developed areas (well pads, roadways and ancillary facilities) be examined to determine the impacts on wildlife, including but not limited to birth rates and migration patterns.

Response

Effects of night time lighting on wildlife have not been specifically included in any studies conducted on the PAPA. It would be very difficult to separate such effects from other human-related activities associated with wellfield development which, as an all-inclusive impact source, has been addressed in the revised Draft SEIS.

Comment Number **I-30-1-M-1****Comment**

Additionally, evaluation and consideration of mitigate efforts including specific mandatory lightly restricting or development curtailment be imposed on operators to mitigate found impacts of night-time lighting of the developed areas on wildlife.

Response

Please see the Revised Draft SEIS.

Comment Number **I-31-1-AQ-1****Comment**

The BLM must put a cap on emissions to preserve the striking views we now and love and cherish and want to hand down to future generations.

Response

BACT emission control compliance is under the jurisdiction of the WDEQ-AQD. The BLM will continue to work cooperatively with the WDEQ-AQD to mitigate impacts.

Comment Number **I-31-1-AQ-2****Comment**

The BLM must act responsibly to protect the people who live and recreate in these areas. They can being by requiring that the industry act in good faith and use cleaner low emission rigs, quantum leap dehydrators and flareless completions.

Response

Mitigation for AQRVs has been identified. The BLM lacks the authority to impose an emissions cap, but is working cooperatively with WDEQ-AQD to mitigate impacts.

Comment Number **I-32-1-G-1****Comment**

On Public lands the best available technology should always be required.

Response

BACT emission control compliance is under the jurisdiction of the WDEQ-AQD. The BLM will continue to work cooperatively with the WDEQ-AQD to mitigate impacts.

Comment Number I-32-1-W-1**Comment**

Existing winter habitat closure rules should be enforced. No more exemptions simply to make it more profitable for the extractive industries.

Response

Please see the Revised Draft SEIS.

Comment Number I-32-1-G-2**Comment**

Some areas are just too special or sensitive to be used for industrial development, at least at this time. Technology for extraction will only improve over time, so the impacts will decrease. These special areas need to be identified and preserved for future generations.

Response

The issue presented in your comment is within the range of alternatives analyzed in the Revised Draft SEIS.

Comment Number I-33-1-W-1**Comment**

Preclude development outside the core areas to provide wildlife with somewhere to go as drilling pushes them off their traditional range on the Anticline.

Response

Alternative D was developed in part by the Proponents and State (Wyoming Game and Fish Department and Department of Environmental Quality). Mitigation measures developed by the Proponents applicable to Alternative D include suspending surface activity on certain leases outside of the Alternative D core area and Potential Development Area (the flanks) for at least 5 years.

Comment Number I-33-1-G-1**Comment**

Make the performance-based objectives of your plan enforceable standards that will hold industry accountable for its practices.

Response

Thank you for your comment.

Comment Number **I-33-1-AQ-1**

Comment

Require the best-available technology for all development to limit emissions and protect air quality and human health from gas-field air pollution.

Response

BACT emission control compliance is under the jurisdiction of the WDEQ-AQD. The BLM will continue to work cooperatively with the WDEQ-AQD to mitigate impacts.

Comment Number **I-33-1-M-1/RC-1**

Comment

Set well-defined and binding mitigation requirements, including for reclamation.

Response

Thank you for your comment.

Comment Number **I-33-1-W-2**

Comment

Adopt all the components of the Wyoming Game and Fish Department's Minimum Recommendations report, which establishes practices that allow for oil and gas development while protecting wildlife.

Response

See Revised Draft SEIS where the BLM has included the suggested mitigation measures for the level of development currently on the PAPA.

Comment Number **I-33-1-G-2**

Comment

Establish requirements for phasing development over time and space to protect wildlife and air quality.

Response

The issue presented in your comment is within the range of alternatives analyzed in the Revised Draft SEIS.

Comment Number **I-34-1-W-1**

Comment

Seasonal wildlife protections must not be lifted on nearby areas since habitat fragmentation proposed for core areas would be more severe than it already is.

Response

Exceptions are allowed for in the Pinedale Resource Management Plan. The SEIS will be in conformance with the existing Pinedale Resource Management Plan.

Comment Number **I-34-1-W-2**

Comment

The flanks of the Pinedale Anticline where there is relatively little development or potential must be protected to allow wildlife access to migratory routes as well as to substitute winter, breeding and nesting ranges that have already been lost in the core areas.

Response

Alternative D was developed in part by the Proponents and State (Wyoming Game and Fish Department and Department of Environmental Quality). Mitigation measures developed by the Proponents applicable to Alternative D include suspending surface activity on certain leases outside of the Alternative D core area and Potential Development Area (the flanks) for at least 5 years.

Comment Number **I-34-1-G-1**

Comment

Mitigation may have to include some restrictions on human recreation use of these areas in order to keep from displacing wildlife further.

Response

The BLM understands the issue of OHV use presented in your comment. Seasonal closures are in the existing RMP and seasonal closures will be managed in compliance with these restrictions.

Comment Number **I-34-1-W-3****Comment**

Those areas in the upper Green River basin that have become increasingly important to wildlife because of displacement from the gas fields should be identified and measures planned to protect them.

Response

The comment includes areas in the Upper Green River Basin that are not on the PAPA (off-site). As noted in other responses to commenters, the BLM can not legally require provisions for off-site mitigation.

Comment Number **I-34-1-W-4****Comment**

The SEIS should state that such provisions for wildlife are part of the proposed action-not just shunted off into some vaguely stated mitigation plan.

Response

The 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.

Comment Number **I-35-1-W-1****Comment**

Any resource planning in this area should also include at least the minimum measures to protect the core survival areas for the species occurring in the area and distinct, concrete mitigation measures should be required.

Response

Thank you for your comment. Please see the Revised Draft SEIS.

Comment Number **I-36-1-G-1****Comment**

In my opinion all operators on the Anticline should be required to observe the same rules that other resource users observe...Operators should be required to use directional drilling and the least number of well pads necessary to perform their work, with the smallest appropriate footprint on the ground.

Response

Thank you for your comment. These measures are within the range of alternatives considered.

Comment Number **I-36-1-G-2**

Comment

I ask that the BLM reject the proposed project unless the corporation can produce mitigations that improve the environmental impacts of the current No Action Alternative.

Response

Thank you for your comment.

Comment Number **I-37-1-G-1**

Comment

Does the state BLM ever look at the combined impacts of development in their various districts when doing an EIS?

Response

Yes.

Comment Number **I-38-1-G-1**

Comment

I am asking the BLM to revise it's SEIS and keep the winter restrictions in place.

Response

Please see the Revised Draft SEIS.

Comment Number **I-38-2-AQ-1**

Comment

The harmful effects must receive greater consideration in determining the advisability of allowing increased drilling.

Response

NAAQS and WAAQS are developed for the protection of human health. The analysis demonstrates compliance with NAAQS and WAAQS.

Comment Number **I-38-3-G-2**

Comment

I am asking the BLM to reject proposals for new wells in this area and enact stronger environmental protections for habitat and environment, protecting wildlife and reducing air pollution.

Response

Thank you for your comment.

Comment Number **I-39-1-G-1**

Comment

Until there has been an independent review of current social, cultural and environmental impacts on existing drilling and activity on both the Jonah and the Anticline, all further development must be curtailed.

Response

Thank you for your comment.

Comment Number **I-40-1-G-1**

Comment

In the subject area, there are cumulative effects both ongoing and on the near horizon that have not been adequately analyzed and address; thus we should halt any escalation of activity in order to prevent any commitment of irreplaceable resources while we still can.

Response

Thank you for your comment.

Comment Number **I-41-1-W-1**

Comment

I write to urge you to take every action necessary to preserve the Greater Sage Grouse and its habitat. Please adopt the stipulations developed by Audubon Wyoming for this purpose.

Response

Thank you for your comment.

Comment Number I-42-1-G-1**Comment**

The question of increased wintertime drilling must be addressed to the degree that the proposal either is negated, or all of the environmental impacts are mitigated to a degree that the Proposed Action would have less environmental impacts than the No Action Alternative in order for this proposal to legally be allowed to move forward.

Response

Please compare Alternative E with Alternatives B, C and D in the Revised Draft SEIS.

Comment Number I-42-2-G-2**Comment**

I ask that the BLM reject the proposed project unless the corporation can produce mitigations that improve the environmental impacts of the current No Action Alternative.

Response

Thank you for your comment.

Comment Number I-42-3-G-3**Comment**

I also ask the BLM address the following questions and comments:
Liquid gathering systems should be used to collect condensate regardless of the alternative adopted, in order to mitigate environmental impacts of the plan (including the No Action alternative).

Response

Thank you for your comment. Please see additional mitigation opportunities in the Revised Draft SEIS.

Comment Number I-42-4-CU-1**Comment**

Cumulative impacts must be addressed between the PAPA and the recently approved infill project at the neighboring Jonah Field, calling for 3,100 new wells. A full EIS analysis of these cumulative impacts must be done in order to adequately mitigate the environmental concerns, especially of air quality, traffic, noise, light pollution, and wildlife impacts.

Response

Cumulative impacts have been properly analyzed in the SEIS.

Comment Number **I-42-5-G-4**

Comment

The final decision for this EIS must clearly confine for the life of the project all new drilling and road building to only the designated "concentrated development area" that runs north-south down the spine of the Anticline.

Response

Thank you for your comment. The BLM will consider your input in making a decision.

Comment Number **I-42-6-G-5**

Comment

What will the timespan for drilling be under the No Action Plan? Under the Proposed Action?

Response

See the Revised Draft SEIS, Chapter 2.

Comment Number **I-42-6-SE-1**

Comment

What will the economic output be for the No Action Plan? For the Proposed Action?

Response

Please see the Draft SEIS, Chapter 4.

Comment Number **I-42-6-SE-2**

Comment

What will the economic returns be for Sublette County over the lifespan of the project under the No Action Plan? Under the Proposed Action?

Response

Please see the Draft SEIS, Chapter 4.

Comment Number I-42-6-SE-3**Comment**

How will the drilling corporation mitigate economic fall-out after the lifespan of the drilling, due to a sharper, faster decline in revenues based on a shorter lifespan for drilling in these field areas under the Proposed Action?

Response

Thank you for your comments. Impacts are disclosed in the DSEIS so that the appropriate agencies may take actions as needed to prepare for and mitigate impacts.

Comment Number I-42-7-G-6**Comment**

How will the drilling corporation mitigate economic fall-out after the lifespan of the drilling, due to a sharper, faster decline in revenues based on a shorter lifespan for drilling in these field areas under the Proposed Action?

Response

Please see the Revised Draft SEIS.

Comment Number I-42-8-W-1**Comment**

Seasonal drilling restrictions must be maintained to reduce impacts on big game and sage grouse during the most vulnerable time of year.

Response

Please compare Alternative E with Alternatives B, C and D in the Revised DSEIS.

Comment Number I-42-9-AQ-1**Comment**

We need rock-solid guarantees that industry will use the cleanest drilling technology available at the outset of the project and a promise that BLM will curb activity when established thresholds are breached.

Response

Please see the Revised Draft SEIS, which contains thresholds for air quality related values, and wildlife resources.

Comment Number **I-42-10-C-1****Comment**

Mitigations must be adopted in order to fully comply with federal standards, and to respect the local tribes whose remains are in these areas.

Response

Compliance with all applicable laws and regulations is a part of each alternative.

Comment Number **I-42-11-GW-1****Comment**

The drilling corporation must include mitigations for loss of wildlife due to lack of fresh water resources in the drilling area.

Response

Please see the Revised Draft SEIS.

Comment Number **I-42-11-GW-2****Comment**

They also must include adequate mitigations to offset the losses to residents who rely on these aquifers for human and livestock consumption.

Response

Appropriate mitigation measures have been identified in the RDSEIS. The BLM will work cooperatively with the DEQ to monitor and mitigate impacts.

Comment Number **I-43-1-W-1****Comment**

Precluding development outside the core area, so that wildlife would have somewhere to go as drilling pushes them off their traditional range on the Anticline.

Response

Please see the Revised Draft SEIS.

Comment Number **I-43-2-W-2****Comment**

Adopting all the components of the Wyoming Game and Fish Department's Minimum Recommendations report, which establishes practices that allow for oil and gas development while protecting wildlife.

Response

See Revised Draft SEIS where the BLM has included the suggested mitigation measures for the level of development currently on the PAPA.

Comment Number **I-43-3-G-1****Comment**

Making the performance-based objectives enforceable standards that hold industry accountable for its practices.

Response

Please see the Revised Draft SEIS.

Comment Number **I-43-4-AQ-1****Comment**

Requiring the best-available technology for all development, thus limiting emissions and protecting air quality and human health from gas-field air pollution.

Response

BACT emission control compliance is under the jurisdiction of the WDEQ-AQD. The BLM will continue to work cooperatively with the WDEQ-AQD to mitigate impacts.

Comment Number **I-43-5-M-1/RC-1****Comment**

Setting well-defined and binding mitigation requirements, including requirements for reclamation.

Response

Please see the Revised Draft SEIS.

Comment Number **I-43-6-G-2****Comment**

Establishing requirements for phasing development over time and space to protect wildlife and air quality.

Response

Please see the Revised Draft SEIS.

Comment Number **I-44-1-W-1/AQ-1****Comment**

We would like to suggest that development outside of the core area be precluded to provide wildlife a haven, that you hold industry accountable for its practices, that you enforce a limit to emissions and protect air quality and human health from gas-field pollution.

Response

Thank you for your comment.

Comment Number **I-44-2-M-1/RC-1****Comment**

We would also like to see well-defined and binding mitigation requirements, including reclamation.

Response

Please see the Revised Draft SEIS.

Comment Number **I-44-3-W-2****Comment**

In addition, we feel you should adopt all the components of the Wyoming Game and Fish Department's Minimum Recommendations report, establishing practices allowing for oil and gas development while protecting wildlife.

Response

See Revised Draft SEIS where the BLM has included the suggested mitigation measures for the level of development currently on the PAPA.

Comment Number **I-45-1-AQ-1****Comment**

Tier II drills which are less harmful to the environment should be mandated.

Response

BACT emission control compliance is under the jurisdiction of the WDEQ-AQD. The BLM will continue to work cooperatively with the WDEQ-AQD to mitigate impacts.

Comment Number **I-45-1-G-1****Comment**

Drilling for oil and gas should be conducted in an environmentally responsible manner to avoid further degradation of water and air quality.

Response

The BLM agrees. Thank you for your comment.

Comment Number **I-46-1-G-1****Comment**

I urge you to consider an alternative that balances multiple uses, protects our quality of life and stabilizes our chaotic socioeconomic environment.

Response

Please see the Revised Draft SEIS.

Comment Number **I-47-1-G-1****Comment**

We, therefore, urge you to seek measures to slow down the drilling, carefully analyze its impacts and take an honest look at the present pressures on our wildlife and air quality not to mention the impact for future generations.

Response

Please see the Revised Draft SEIS.

Comment Number **I-48-1-AQ-1****Comment**

The current level of nitrous oxide emissions per year already exceeds what was predicted in 2000 by a multiple of 4x. Even in the face of this existing and growing threat to air quality, the draft SEIS offers no credible protection for the air.

Response

The BLM lacks the authority to impose a cap on emissions, but is working cooperatively with the State of Wyoming to mitigate impacts, as outlined in the various alternatives of the Revised Draft SEIS.

Comment Number **I-49-1-AQ-1****Comment**

Since the proposed sources of acid precursors are so near the Class I areas, the deposition will be not only concentrated but will shift with the wind making it hard to monitor. Some parts of the wilderness will suffer worse than others, with some lakes undergoing a season acidification. I recall hundred-mile views from the peaks of the Wind River Range. Yet with the current overload of drilling and development, visibility in these Class I area has deteriorated not only measurable but significantly. I suspect that a conscientious monitoring program would find both chemical and visibility impairment that exceed the allowable increments under the Clean Air Act.

Response

Thank you for your comment.

Comment Number **I-49-2-G-1****Comment**

Please withdraw this fatally-flawed SEIS and come up with a plan that serves the public interest.

Response

Please see the Revised Draft SEIS.

Comment Number **I-50-1-G-1****Comment**

I therefore strongly urge the Bureau of Land management to deny increased development of oil and gas extraction in the Pinedale Anticline Project Area (PAPA) described within Alternative B (Proposed Action Alternative).

Response

Thank you for your comment.

Comment Number **I-50-2-G-2**

Comment

I therefore urge the BLM to adopt Alternative A (the No Action Alternative), which would require additional environmental review when development within the PAPA reaches beyond levels specified in the PAPA Record of Decision.

Response

Thank you for your comment.

Comment Number **I-50-2-W-1/VG-1**

Comment

We obviously need more study to understand how energy development affects sagebrush ecosystems, and how those impacts can be managed to minimize and mitigate their damaging effects.

Response

Thank you for your comment.