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These are my comments regarding the Supplemental Environmental Impact Statement on the Pinedale Anticline Project Area in Sublette County, Wyoming.

G-1 I-2-1

1. Why is a 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)?

G-2 I-2-2

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

G-3 I-2-3

3. 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.

G-4 I-2-4

4. Do not give away control over public lands with a one time SEIS which is not open for ongoing public and agency review. After a ROD is issued, what access is there for the public to comment on the project?

G-5 I-2-5

5. How does this plan to change an area from wildlife habitat to industrial use only fit in the mission statement of the Bureau of Land Management? The plan for intensive drilling right from the beginning does not allow for people and wildlife to acclimate and adjust to the profound changes due occurring not just to wildlife habitat but to the socio-economic impact on the community and county.

6. If the PAPA field development is considered important in meeting national energy and national security needs, the PAPA must be under congressional review and authority as in the Alyeska Pipeline in Alaska. The situations are similar in that leaseholders develop their fields in Prudhoe Bay yet delivery and land use is still open for public scrutiny.

7. This congressional oversight would insure that leaseholders and management agencies are in compliance with federal regulations and more responsive to the national interests than just leaving it in the domain of one agency, currently the Bureau of Land Management which has demonstrated that it is not funded adequately to be capable of doing currently required monitoring.

8. This oversight would make the field development and compliance more transparent and would help to ensure industry compliance to standards and build public confidence in the process.

I-2-6

9. The BLM is now not capable of meeting monitoring or enforcement requirements that are required of the leaseholders on public lands.

G-6 G-7 I-2-6 G-8 G-9

- There are citations in this document of previously required compliance documents that are not completed and allowed to expire; see cultural resource section.
- 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.
- Also there are third parties delegated to do assessment work but it is not stated what the penalties are for non-compliance.
- Who has actual oversight and enforcement powers to insure the best uses of the resources of the nation's property?

G-10 I-2-7

10. 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?
    - The Department of Interior is still embroiled in settling the accuracy of leasing revenues from oil and gas developments on Bureau of Indian Affairs lands over the past decades.
    - In the mitigation plan, the 3 for 1 exchange mentions the possibility of using conservation easements to meet some of the mitigation requirements. The surface rights may be protected but the mineral rights could still be developed resulting in the same effect as on the core development areas.

While I have read most of the SEIS in detail, page by page, my main concerns are encompassing these areas:

G-11 I-2-8

1. 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.

G-12 G-13 I-2-9

2. 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? With the time table for exploration and development and the long production life of the field, who has the mandate to ensure compliance? BLM is not adequate funded to even now do the monitoring required in earlier EISs or permitted work.

MO-1 I-2-10

3. The pace of development is too rapid to assess the impacts. Right now there is winter drilling allowed on the Mesa, why not wait until the results of monitoring studies are in from these drilling projects before open the area to intensive drilling.

G-14 I-2-11

4. 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

G-14 I-2-11

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.

5. I attended the scoping meeting held by BLM and they were stated as "open house meetings" with no real substantive information presented by the agency nor were the people attending these meetings given a chance to discuss in a public forum the basic questions and nuances of these alternatives.
6. Given the on-going leasing by BLM in areas adjacent to the PAPA and the concurrent USFS review of potential leasing in the Bridger-Teton Forest, the private citizen interested in the future of Sublette County is burdened with reviewing each proposal, submitting comments, and committing a lot of time to understand the various options just to try and maintain the current standard of living in the area. I think putting these demands on the concerned public all at once does not give us time to consider, understand, and thoughtfully comment on major impacts proposed by the rapid development of the oil and gas fields.
7. The surface disturbances will reduce useable land due to invasive weeds from poor reclamation. At existing well pads, it is possible now to see tumbleweed invading well pads and alkali rich soil eroding on to adjacent rangelands; the result is reduction in useable rangeland for wildlife and livestock.
8. There are water quality issues and impact of surface disturbances on water quality and quantity for the scale of this project
9. Wildlife populations and diversity need to be maintained and not sacrificed to industrial development.
10. In an effort to extract underground mineral wealth, there are two pages listed of surface resources that will be negatively impacted by these alternatives; see executive summary pages vi and vii.

The aim of the alternatives B and C is to change the land to an industrial site and forfeit the resources of landscape that support a combination of habitats that have provided unique wildlife resources compared to most areas of the United States.

1. Wildlife populations are endangered as it is not possible to do a three acre mitigation for each one acre of lost habitat if the lost area is crucial range for deer, antelope or sage grouse. The success of habitat mitigation is not measured on a square footage basis.
2. It is not clear in the document where this extra land would come from given the current leasing pattern of other BLM or Forest Service Managed lands in the area.
3. The program of drilling around Core Development Areas to define and probably increase the field side reduces more rangeland for wildlife; it can expand the CDAs without limit. Alternative B lifts the winter stipulations and that action is not

acceptable given the trend under the No Action Alternative already shows decreases in Mule Deer numbers, habitat fragmentation for Antelope and decreases in Sage Grouse habitat.

4. Crucial habitats have attributes that supply the requirements of wildlife at specific seasons, for example deer use the southwest facing slopes of the Anticline area (known as the Breaks) for winter range due to snow freer slopes, thermal protection, and access to more accessible new forage. Specific landscape elements make the land area crucial; it is not just a trade of square footage from one site to another for successful mitigation efforts.

5. Sage grouse require sagebrush in order to survive. They are an obligate species on this shrub. The population levels are also recognized as being threatened to the point of near future inclusion on the federal Endangered Species listing. Disregarding the habitat requirements and seasonal use patterns of this grouse will only further reduce their numbers. Avoid future environmental problems by developing plans that meet the multiple uses of resources.

The PAPA area is encompassed by the Green River and the New Fork River which are classified as high quality water sources and the headwaters for the Colorado River Basin Water Resource that is managed under federal, multi-state, and international treaty. Most of the surface disturbances cited in the SEIS such as erosion, and soil disturbances imply negative impacts that can affect water quality and quantity. These negative disturbances will affect down stream water rights and uses, fisheries, and wetlands.

WQ-1 I-2-12

1. 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.

SW-1/WQ-2 I-2-13

2. 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. There are enough examples of deteriorating or hazardous water quality problems surfacing years after an initial project was started; examples include Ft Greeley in Alaska where an early version nuclear power plant seems to be leaking Deuterium, heavy radioactive water, into the Jarvis Creek watershed of the Tanana River, the Tule Elk Refuge in Calif where agriculture pollutants affect the health of wildlife due to chemical poisoning, and reports of water quality in various cities in the US as cited in US Census Bureau Maps.

GW-1 I-2-14

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

GW-2 I-2-15

- 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.

GW-3/SW-2 I-2-16

- 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.

- The national oceanographic and Atmospheric Administration (NOAA) has issued a report citing drought in Wyoming as Severe to Extreme (Sublette Examiner Mar.22, 2007; page 2). The trend in early snowmelt patterns and the decreasing glaciers in the adjacent mountains that supply surface waters indicate a naturally occurring lowering water table in the future during the development phase as projected.

AL-1 I-2-17

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

- 2.4.3.1 (pg 2-38) The Conservation Alternative is a better way to meet the needs of energy development while keeping the land in sustainable wildlife use with the added seasonal restrictions and mitigation. The lease holders would still be allowed to develop the field, receive successful profits on development and the land would not be sacrificed to solely industrial use.

- 2.4.3.3 (Page 2-39) The Reduced Pace of Development Alternative would allow development at a reduced pace and kept the land useable. It is not in violation with the Energy Policy Act of 2005 in that it would prolong the life of a local field and thus provide a more consistent supply of lots of gas to the nation over a longer time. Currently there is an excess of gas due to limited delivery systems. Once pipelines and facilities are in place to move the gas, presumably lower costs and stable supply would benefit the nation.

Chapter 3 on the Affected Environment also describes the socio-economic impact of Sublette County.

T-1 I-2-18

- 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? The repair expenses of local roads should not be borne by the local taxpayers when the benefit goes to the leaseholders.

- There is already very low unemployment in Sublette County, based on monthly state statistics, and the current workforce cannot meet the local retailer needs. The Alternatives B and C would exacerbate the problem with fast pace development.

I-2-19

Section 3.21. On Threatened and Endangered Species and special status species lists the Black footed ferret. **Section 21.1.1 states that the USFWS has determined that 64 square miles of the PAPA are within the Big Piney prairie Dog Complex; see page 3-97. I saw an animal strongly resembling a black footed ferret and have filed a rare mammal sighting report with the Wyoming Game and Fish department**

W-1 I-2-19 **that handles non-game sightings. I filed the same report with Steve Lester at the Pinedale BLM office. Currently surveys are recommended in the area but based on additional anecdotal information I have received from residents in Sublette County, I strongly suggest that <u>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.</u> The required the surveys must be completed accurately so that if the animals are present, the resource can be managed effectively from the start and not in a reactive manner. A copy of my report is attached to this paper.**

Appendix A page A-5 cites the Pinedale Anticline Working Group (PAWG) as a reviewing committee that would evaluate arrangements and make recommendations to BLM. The past year has shown that BLM chooses not to include or even accept recommendations made by the PAWG; it has become a worthless group, tying up the time and expertise of knowledgeable citizens but denying them a voice in decisions.

G-15 I-2-20 1. How will BLM or any other supervising agency get reasonable and valid input by knowledgeable persons if it does not follow stated policy?

G-16 I-2-21 2. What serious efforts will be made to develop public trust in stewardship of public lands for the best uses instead of just to industry requests?

Appendix E states that Performance Based Objectives will be used in mitigation for year round drilling sites. The Gold Book standards would be attached to APDs submitted.

G-17 I-2-22 1. What if there are special measures need to be used n specific site situations that are not referenced in the Gold Book, which may be more applicable to usual situations.

G-18 I-2-23 2. What would be the enforcement policy and which agency has authority to require and monitor these unique situations?

G-19 I-2-24 3. 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.

G-20 I-2-25 4. Are there plans for secondary and tertiary recovery techniques of the gas fields and how would those impacts be considered?

AL-2 I-2-26 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 production life of the project.

- The duration of this project will exceed most of our lifetimes. There needs to be a national entity with protection and funding powers, such as the US Congress to ensure oversight and responsible development and use of resources for the nation.

- Given other developments and needs for larger pipelines to move gas to consumers nationwide, Alternatives B and C put the cart before the horse. The Pace of Development needs to be slower to ensure successful implementation of the Best Practices and to allow for industrial technology to best use the resource. A few years ago the gas was not accessible, now new fracting technology has made it possible.
- The executive summary lists the following surface resources as negatively impacted by these alternatives;
    1. Land use will be changed to a predominately industrial landscape.
    2. Decreased recreational use within the PAPA
    3. Visual Resources will be impacted with VRM changes from Class II to Class III levels
    4. Cultural and Historic Resources will be negatively impacted by new surface disturbances. Increased disturbance is likely in areas with high archeological value.
    5. Air quality is an issue of growing importance with recognition of unexpected levels of ozone and pollutants.
    6. Noise levels will increase with disturbances up to ½ mile away from sites.
    7. Additional disturbances of soil surface will increase erosion and slope stability.
    8. Paleontological resource may/will probably be lost due to additional surface disturbances.
    9. Drilling of water supplies could lead to temporary drawdown of the Wasatch Aquifer and possibly alluvial water.
    10. Surface water quality may be negatively impacted in 6 watersheds due to increased erosion if management and reclamation is not timely.
    11. Surface disturbances would increase erosion of some soils, reduce revegetation capabilities, and increase sediment load into aquatic and riparian habitats.
    12. Noxious weeds can be expected on unreclaimed grounds and surface disturbance of native vegetation is expected.
    13. There will be a decrease in grazing resources with the land use change and increased presence of noxious weeds.
    14. Wetlands, riparian resources and flood plains will experience loss due to sedimentation, removal of native vegetation, and possible impact on flood plain function with river channeling.

15. Some impact on endangered species is likely, such as the bald eagle, and the potential impact on prairie dog communities and possible black footed ferrets is possible.
16. The negative impact on wildlife, migratory birds, fisheries and aquatic resources is significant due to habitat loss, fragmentation of connective landscapes, loss of critical seasonal ranges, fencing, human disturbance, traffic and other disturbances associated with intense field development.

G-21

I-2-27

With the 17 items mentioned above, how does this project benefit the local community and national interest in public lands management? Given the depth and breath of these negative disturbances on the Pinedale Anticline and on-going development in the Jonah Field, this document does not address fully the social and environmental costs of the alternatives proposed, nor even the existing development and should no be sufficient for a Record of Decision that will impact the long term future of the resources of Sublette County, Wyoming.

Please include my comments in your review of public inputs on this SEIS. Thank you for your consideration.

Sincerely,

Peggy Bryant

Peggy Bryant

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Here is some recent public information that supports my observation of a black-footed ferret.

The BLM draft supplemental EIS statement for the Pinedale Anticline Oil and Gas Exploration and Development project cites the Fish and Wild Life Service as determining that the area is within the Big Piney Prairie Dog Complex which has not been surveyed for Black-footed Ferrets. See Attached page 4-115 of the recent EIS draft (Dec 2006) and highlighted areas on the Sublette County general address map and Map 2000(available from the Sublette County Assessors Office).

Why does my observation matter?

When I have mentioned my observation to other residents in the county, they have offered supporting anecdotal observations of wild ferrets and prairie dogs within the localized area of Sublette County in western Wyoming. While black-footed ferrets are elusive and rare, the habitat and prey availability suggests they could be present in areas not yet surveyed and as yet undisturbed by gas field development.

These notes are of my observation of a black footed ferret, Mustela nigripes, running across Fed Hwy 189 (Mile Post 119-117) in August 2006.

I was driving south on Highway 189 and had just passed the Cottonwood Creek-Ryegrass Road, County Road 23-117 on an early afternoon in mid-August on a clear cloudless and calm day. I was driving about 65 mph and glanced in my rear view mirror to check on the location of a person who was following me to a meeting in Marbleton, Wyoming. When I glanced in my rear view mirror, I saw a ferret run across the road in long strides from east to west. I saw the entire animal in a lateral view and it was long and slender, about two feet in length, and dark on the head and tail areas, the general body was a grey-tan-beige color. I saw the entire animal and did not notice the legs in particular. Its body length was similar to its tail length. I got a clear view of it and it was a member of the Mustelid family. It just bounded flat out across the road and I saw it only as it crossed the pavement but had an unobstructed view of the animal.

I was so surprised that I stopped my car and got out to note the general area, specific landmarks, and mileposts. It is the section of highway where the road goes through some low rolling hills before it flattens out on the way to Marbleton. I have marked the area on Map 2000 attached.

The general area (within 2-4 miles) is the rolling hills area, noted by a section of pink eroded outcrops of badlands on the west side of the road. It is an area of open scrub, grassland, sagebrush steppe with eroded water courses. I have attached photos of the area that I took in early December of the area between Mack Road and Dunham Road; see attached Sublette County maps.

Standing along the road after I saw the animal, I went through my mental list of all similar animals that I am familiar with in the Mustelidae family and it was too big to be an

ermine or weasel, wrong color and habitat for a marten, not broad or stripped as a badger. My initial gestalt (impression) of the animal is that it was a ferret, but I did not know what species of wild ferrets are in this area. I had a clear view of the animal as it crossed the road. I checked with Dr. Steven Buskirk, Professor at Univ. of Wyoming, whom I had known in Alaska while he completed his marten studies and he confirmed that the black footed ferret is the only wild ferret found in Wyoming. He encouraged me to submit a mammal observation sighting to your office.

As a follow-up, I asked Melanie Ball who is a rural mail carrier in the Cottonwood Creek area if she had ever seen black-footed ferrets while driving her route. Her family has lived in the area for years. She has not seen ferrets but has seen lots of prairie dogs in the general area. I have also seen prairie dogs along the roads in this area, but I do not know what specific species they are. I have ground squirrels in my area in Cora and can tell them apart from the prairie dogs.

I checked with Wyoming Game and Fish in Pinedale for a pamphlet on prairie dogs and their status. Since they are considered non-game, individuals and colonies are not protected and can be shot. I have been discrete in mentioning my sighting. I did not know there was a form to report rare mammal sightings until I mentioned my sighting to Bettina Sparrowe of Daniel who mentioned Susan Patla and that someone else had a similar sighting in the same general area. In November I mentioned my sighting to Linda Baker, Upper Green River Coalition, who also encouraged me to report it and mentioned that a skull of a black-footed ferret had been found on surveys in the Jonah field in the past; she has the news article in her records. Sally Swift of Boulder told me that her daughter Betsy had reported seeing a black-footed ferret in the past to the Fish and Wildlife Service. I have mentioned my sighting to only a few people and am surprised to hear of similar observations.

I have a Masters of Science in Wildlife Biology from the University of Alaska, Fairbanks and am familiar with faunal species of the northern forests. My husband and I have lived in the Cora area for the past four years and have hiked in various areas of Sublette County. I have done surveys for Threatened and Endangered Species in the boreal forest and have a good eye for spotting game.

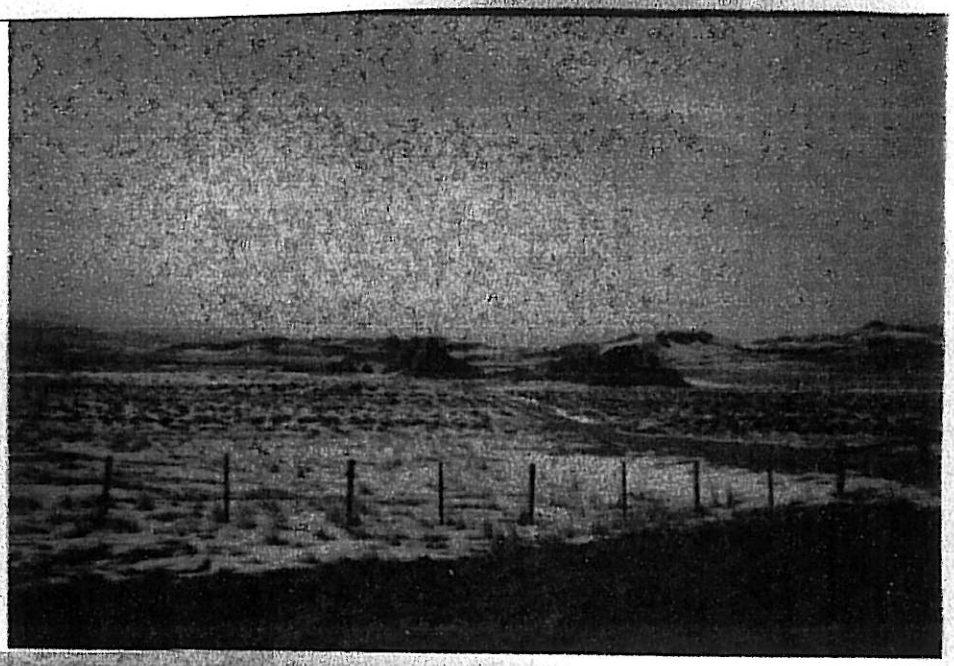
Please contact me if you need any follow up information. I have included my contact addresses in the letterhead. I would be willing to help with surveys for prairie dogs or black-footed ferrets in this area. Thank you for your interest in my observation.

Sincerely,

Peggy Bryant

Peggy Bryant

I sent this letter to Martin Grenier
Nongame Mammal Biologist
Wyoming Game and Fish Department
260 Buena Vista
Lander, WY 82520



These badlands are the most noticeable landmark to the north

21701-12A The most noticeable landmark is the area of Pink Butte badlands along Hwy 189 south of Daniel, Wyoming. I saw the black-footed ferret just south of this area around Mileposts 118 to 116.

← Hills are the area of interest

- I pulled off the road at the safest place to stop for a photo

21701- 11A General area along Highway 189 Mileposts 115 Dunham Road or MP 116 near Jensen Lane looking north and west.

Penny Bryant
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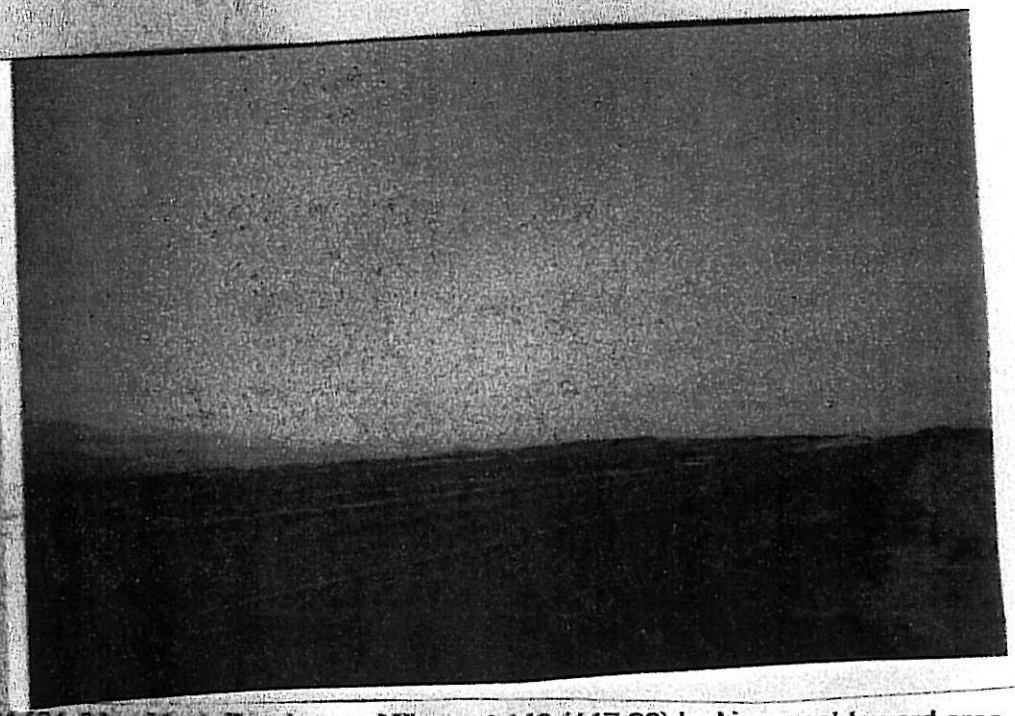
2007 APR -6 PM 2:54

Transition zone from low hills to flatlands

21401-7A – Looking north up highway 189 toward rolling hills area where I saw a ferret cross the road in August. I took the photo in Dec 2006, which has been a light snow year. The possible location is MP 116.5, Jensen Lane.



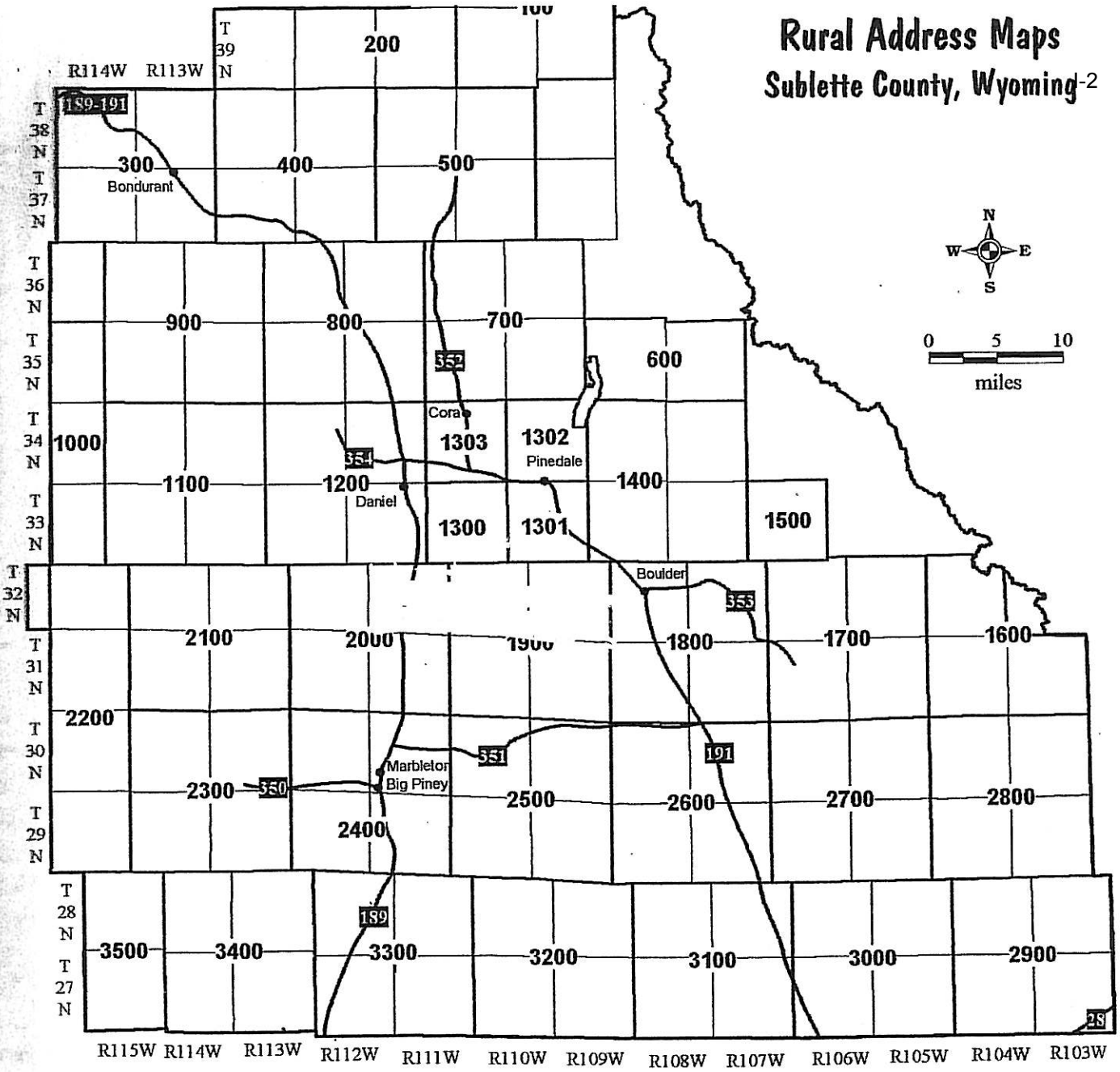
hills area of interest

21401-6A – Mack Road area, Mile post 118 (117.96) looking west toward area where I saw a ferret cross the road.

2007 MAR -5 PM 2:54

Rural Address Maps

Sublette County, Wyoming



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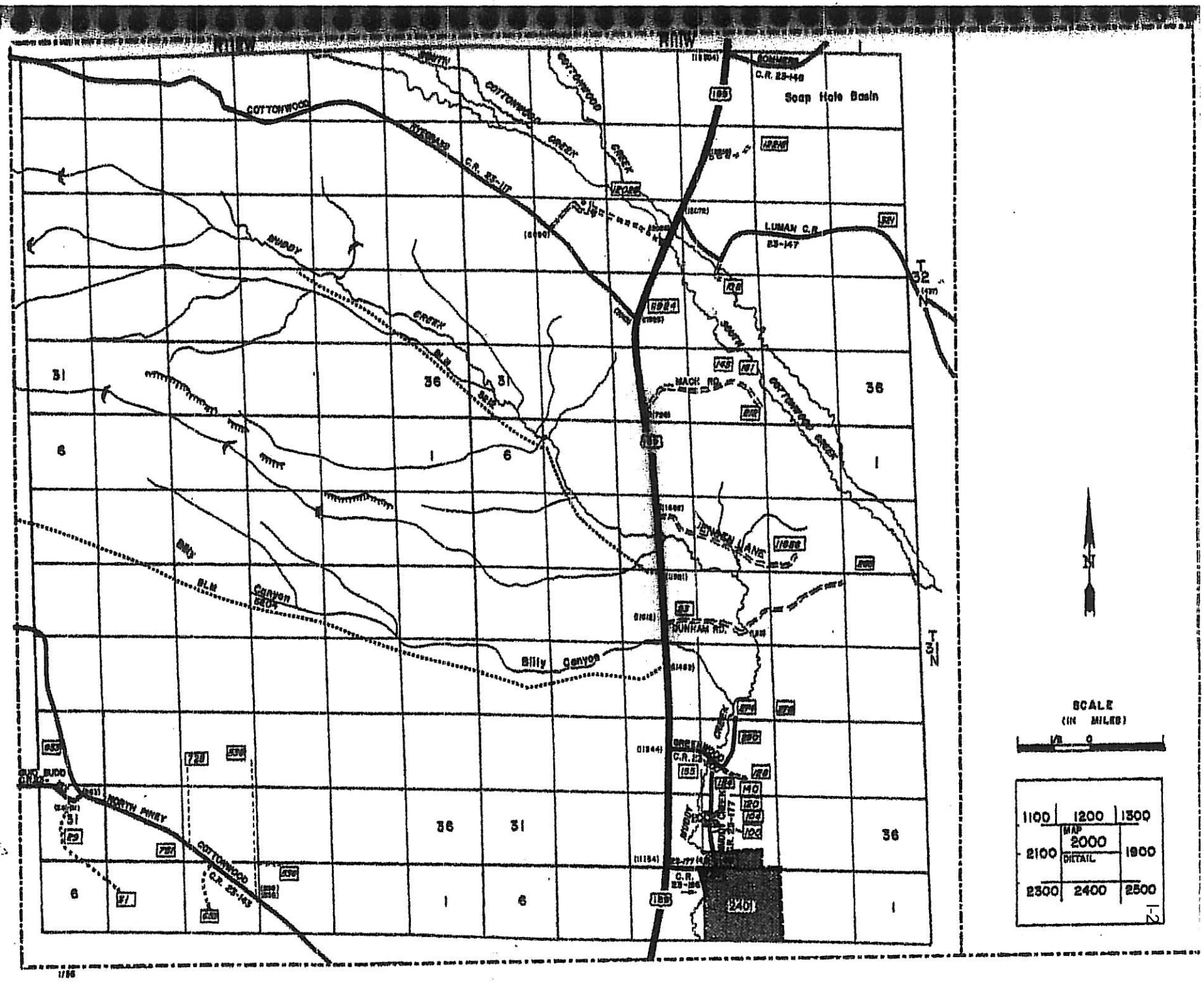

Soap Hole Basin
COTTONWOOD
SOUTH COTTONWOOD CREEK
C.R. 23-117
LUMAN C.R. 23-147
MACK RD.
JENSEN LANE
DUNHAM RD.
Billy Canyon
NORTH PINEY
C.R. 23-143
GREENWOOD
C.R. 23-146
SCALE
(IN MILES)
1100
1200
1300
MAP
2000
DETAIL
2100
1900
2300
2400
2500

emergent herbaceous vegetation consisting of sedges and rushes. This wetland vegetation type is present along the river banks of the Blacks Fork and Green rivers. Emergent wetlands are present within the flood plain of the New Fork River. The flood plain also supports forest-dominated riparian habitats with mostly willows and cottonwoods.

3.21 THREATENED AND ENDANGERED SPECIES AND SPECIAL STATUS SPECIES

3.21.1 Development Within the PAPA

3.21.1.1 Federally Listed, Proposed, and Candidate Species

At the time the PAPA DEIS (BLM, 1999a) was prepared, Ute ladies'-tresses orchid, black-footed ferrets, bald eagles, whooping cranes, and four species of Colorado River fish were species listed under the Endangered Species Act (ESA) that were considered potentially vulnerable to development in the PAPA. Canada lynx and mountain plover were species proposed for listing, and swift fox was a candidate species for listing under the ESA. Since 2000, Canada lynx have been listed as threatened (FWS, 2000) while the proposal to list mountain plovers as threatened was withdrawn (FWS, 2003b). Swift fox is no longer considered to occur in the region.

Recently, the FWS (2005b) in a written communication to the BLM identified the following species that could be affected by natural gas developments in the PAPA: black-footed ferret (endangered), Kendall Warm Springs dace (endangered), Colorado River fish (endangered), bald eagle (threatened), grizzly bear (threatened), Canada lynx (threatened), Ute ladies'-tresses orchid (threatened), and gray wolf (experimental population). Although they were addressed in the PAPA DEIS (BLM, 1999a), whooping cranes (endangered) are not included because the last surviving crane in the population died in 2002 (Whooping Crane Conservation Association, 2004). There are other species that are candidates for listing (yellow-billed cuckoos), and that FWS (2005b) identified as sensitive (greater sage-grouse and pygmy rabbit).

Black-footed Ferret. Historical evidence suggests that black-footed ferrets occurred in the Green River Basin. Ferrets are closely associated with prairie dog colonies, like those in sagebrush-grasslands (Cerovski et al., 2004). The FWS (2004a) evaluated the potential for prairie dog colonies in Wyoming to support black-footed ferrets. As a result, the FWS has determined there are many areas in the state not likely to be inhabited by the species, based on habitat quality and likelihood that ferrets, if ever they were present, are now extirpated. The FWS (2004a) determined that approximately 64 square miles of the PAPA (all or portions of Townships 29 through 31 North, and Ranges 109 through 111 West) are within the Big Piney Prairie Dog Complex, in which surveys for black-footed ferrets are recommended. The remainder of the PAPA has been cleared for further need to conduct surveys for the species (FWS, 2004a).

Reg

Kendall Warm Springs Dace. This species is restricted to Kendall Warm Springs, an aggregation of thermal seeps and springs that eventually flow into the Green River. The population is limited to approximately 980 feet of pools and stream segment, all within the Bridger-Teton National Forest (FWS, 1982), approximately 30 miles north of Pinedale.

Colorado River Fish. The FWS (2005b) has indicated that the bonytail, Colorado pikeminnow, humpback chub, and razorback sucker may inhabit the Colorado River System downstream from the PAPA in the Green River. Prior to construction of Flaming Gorge Reservoir, populations of pikeminnows and bonytails may have been viable in the Green River, although they are now extirpated (Baxter and Stone, 1995).

Bald Eagle. The FWS proposed to remove the bald eagle from the list of threatened and endangered species in 1999 (FWS, 1999); but delisting has not occurred and they remain a

well pads. Nest abandonment due to wellfield development by less tolerant individuals would be a direct impact to raptors.

Special Status Plant Species. Suitable habitat for BLM sensitive plant species would be identified prior to construction of new wellfield components. Surveys would be conducted to locate sensitive plant populations, and they would be avoided during construction or otherwise conserved. Special status plant species include meadow pussytoes, Trelease's racemose milkvetch, Cedar Rim thistle, large-fruited bladderpod, Beaver Rim phlox, and tufted twinpod. Of these species, large-fruited bladderpod has been documented in the Ross Butte and Blue Rim areas of the PAPA (Fertig, 1998), within portions of the Sensitive Soils SRMZ and desert shrub vegetation. In 1998, OHV use and surface disturbing activities (road construction) were judged to be the main threats to local sensitive plant populations. Within the Blue Rim Area of sensitive soils, 590 acres potentially will have been disturbed by wellfield development by the end of 2006, though effects by those disturbances to large-fruited bladderpod are unknown.

Pipeline Corridors and Gas Sales Pipelines

Federally Listed Species. Potential impacts to threatened and endangered species from pipeline construction would be similar to impacts from wellfield development within the PAPA.

Bald Eagle. Suitable habitats for bald eagle are present along the proposed pipeline corridors. Known nesting locations and potential roost sites are present near the BFGC and OPC pipeline corridors in forest-dominated riparian vegetation habitats along the Green River. Bald eagle surveys would be conducted prior to commencement of construction activities within suitable habitats. Increased traffic along the pipeline corridors during construction activities has the potential to cause direct mortality from vehicle collisions although pipeline construction is not expected to impact bald eagles.

Black-footed Ferret. Potentially suitable habitat for black-footed ferrets is present within and adjacent to the proposed pipeline corridors. Short-term disturbance to prairie dog colonies in the Moxa Prairie Dog Complex would likely occur as a result of pipeline construction activities. Direct loss of prairie dogs, the principal prey of black-footed ferrets, would likely result from blading, grading, and trenching activities. Despite potential impacts to prairie dogs and suitable habitats for black-footed ferrets, impacts to black-footed ferrets are not expected because recent surveys in the project area failed to locate black-footed ferrets. Furthermore, additional black-footed ferret surveys would be conducted in suitable habitats prior to construction activities. If black-footed ferrets are located within 0.5 mile of proposed activities, BLM would consult with FWS to determine necessary conservation measures. These measures would ensure that pipeline construction would not adversely affect black-footed ferrets.

Kendall Warm Springs Dace. This species is limited to habitat in the Bridger-Teton National Forest, approximately 30 miles north of Pinedale, and would not be affected by construction of the pipelines.

Grizzly Bear. Grizzly bears are not likely to occur in the area of the proposed corridors. Pipeline construction would not affect grizzly bears.

Canada Lynx. Absence of montane, forested habitat precludes Canada lynx from occurring within the pipeline corridors. Canada lynx would not be affected by construction of the pipelines.

Ute Ladies'-tresses Orchid. This species has not been detected within the proposed pipeline corridors or within southwest Wyoming. Impacts to wetland habitats would be mostly avoided because rivers would be crossed by HDD construction techniques. Ute ladies'-tresses orchid are not expected to be impacted by pipeline construction.