

April 5, 2006

Matt Anderson  
Bureau of Land Management  
P O. Box 768  
Pinedale, WY 82941

2007 APR -5 PM 3: 31

RE: Comments on the Pinedale Anticline  
Supplemental Environmental Impact Study

Dear Mr. Anderson:

I have been serving as the Pinedale Anticline Working Group Water Resources Task Group Scribe for the past four years. As a Sublette County citizen/resident and volunteer on this Task Group, I am not paid to attend meetings and in fact, have taken time off from work and lost pay in order to participate in this process. I have continued to attend because I am a full time Sublette County resident who owns a home, worships, shops and works in Sublette County. I am not a hired speaker for any company or organization, including the PAWG Water Resources Task Group. I do not represent any opinion or outlook except for my own - - as a person who has been and will be impacted by oil and gas development in Sublette County.

Having been involved in the research and discussion process for the past several years, I suggest that the Bureau of Land Management consider the following topics and include procedures to address these concerns:

(1) Complete the requirements stated in the US Dept. of Interior, BLM, Record of Decision (ROD), dated July 2000, pages 19 and 20, "... In addition to chemical components, the monitoring program should include channel conditions near culverts and long-term effects of surface disturbance on erosion in the PAPA." The ROD specifically required that the potential for run-off and/or migration of contaminants (e.g. hydrocarbons/ chemicals/dust/dirt/silt) and movements of water borne materials to streams be addressed – this has not been done. As required by the Clean Water Act and WYDEQ Stormwater Management Pollution Prevention, BLM should undertake a study to include calculation of the cumulative impact of run-off and sedimentation within the PAPA watershed and account for all impervious surfaces, e.g. well pads, office/housing units, tanks and miles of roadways. The study should also address if the Federal and State requirements are being adhered to and met and if the oil and gas producers adequately address and minimize movement of soil off site? As an example of the relevance of this concern, the most recent report submitted by EcoAnalysts, Inc. to the Sublette County Conservation District determined the presence of macroinvertebrates which flourish in degraded water habitats with high levels of sedimentation.

SW-1

I-15-1

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

(2) It is apparent that it is not known if the aquifers in the PAPA are or are not continuous and that no comprehensive study has ever been undertaken to characterize this complex hydrologic system. The potential for aquifer contamination, via well drilling/completion and other means, is

not accurately known. It is imperative that BLM establish and analyze existing databases to create a scientific picture of PAPA aquifers. BLM should require that an in-depth analysis of all known and existing data, including information from the Western WY Community College Water Lab data; Leopold/Emmett data; USGS National Well Information System (NWIS) data; BLM data; WY State Engineers Office data; WY Oil and Gas Commission data; WY Water Development Commission data; WY Game & Fish data; United States Fish and Wildlife Service data; Sublette County Conservation District data; United States Forest Service data; University of Wyoming Water Resources Data System (WRDS); along with information compiled in professional and academic studies conducted by GeoScience & Engineering, Inc.; Dynamac Corporation; Dinwiddie (1973); Welder (1968); Martin (1996)/Naftz (1996)/ Lowham, et al (1985)/ Chafin, D.T and Kimball, B.A. (1992)/ Zimmerman & Collier (1985) and others as well as data commissioned by individual land owners within the PAPA, be collected and synthesized into a technically accurate and scientifically plausible study.

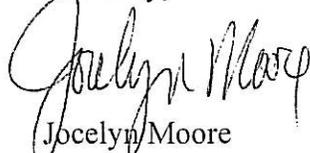
GW-1 I-15-2  
**BLM should halt additional oil and gas production until such time as an aquifer characterization study can be completed and relied upon to preclude water contamination in the issuance of further drilling.**

(3) During the production process, produced water containing salt from ancient seas which covered Sublette County, are discharged. Due to requirements of the Colorado River Compact, which limits the amount of salty water which Wyoming can pass to our southern neighbor, this produced water must be treated prior to discharge to water bodies or land within the PAPA. As noted by a sister Task Group, there is a 1.5 million gallon shortfall in treatment and disposal of produced water. Though a request to the PAWG to establish a Produced Water Sub Committee fell on deaf ears, it is imperative that the BLM establish a monitoring and reporting program to address produced water. The study should calculate the amount of produced water, the produced water treatment capacity, including reinjection, and establish a calculation of overage and the final resolution of the location of the salty water.

GW-2 I-15-3  
**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.**

I appreciate your attention to my comments and thank you for your time and attention.

Sincerely,



Jocelyn Moore  
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 Pinedale, WY 82901

cc: Governor Dave Freudenthal  
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 200 West 24<sup>th</sup> Street  
 Cheyenne, WY 82002