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To <WYMail_PAPA_YRA@BLM.gov>
cc
bcc
Subject Comments: Anticline DSEIS

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

Re: Pinedale Anticline DSEIS

February 12, 2007

Dear Mr. Anderson,

I would like to comment on the Shell/Questar/Ultra proposal for Concentrated Development Areas, year-round drilling, and liquid gathering systems.

This proposal is being sold as a great way to extract gas and protect the Mesa at the same time, while benefiting the landscape and community with better environmental practices and a consistent population of workers throughout the year.

It appears to me that the industry has the technology and the capital to develop gas resources on the Mesa without making the BLM and the public dicker for proper mitigation and protection of the land. The workforce population issue is not really a community problem. The industry workforce in general has created a host of community problems, but not necessarily because it is seasonal. Having those workers around full time could in fact be worse. Seasonal workers are very expensive, though, for operators. I suspect the industry is trying to reduce its own costs and headaches, not ours.

In my opinion, all operators on the Anticline should be required to observe the same rules that other resource users observe. Therefore, I do not think year-round drilling is appropriate. 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. Perhaps this means CDAs, perhaps not. All of the measures to reduce impacts and emissions, such as liquid gathering systems, should not be a condition of year-round drilling, but should occur

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I am not convinced that more intensive and rapid development is really a win-win situation. It is obviously a win for the minerals industry, but what is the industry really offering Sublette County that it shouldn't be required to do anyway? And does the BLM have the manpower and enforcement capability to monitor hell-bent-for-leather gas development on the Anticline?

There is less risk and more gain for Sublette County with a slower, more controlled, and better policed pace of gas development. It is time for the public agencies to use their leverage on behalf of the public, and require the minerals industry to dance to our tune a little bit. They will ultimately have what they want. In the end, will we have asked a sufficient price for that privilege?

Thank you for the opportunity to comment.

Sue Sommers