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Dear Sir(s):

Please withhold my address from Public review and from disclosure under the Freedom of Information Act.

I wish to thank you for the opportunity to express my concerns regarding the BLM's Preferred Action Plan C for the Pinedale Anticline Project Area. Thank you also for the extension on the deadline for the submissions. I appreciate the amount of work that has obviously gone into preparing the dSEIS, and also realize that the local BLM workers are in a difficult position, trying to satisfy conflicting pressures from Leaseholders, federal and local governments and affected citizens. "This is tough stuff," I overheard one employee say. I'm sure it is. Yet I truly believe that it will be a grave mistake to go ahead with this proposal, and thus am urging all of you in the local office to be vigilant in your efforts to amend the proposal and adopt a more moderate pace of development in the PAPA.

My concerns with the Preferred Action Plan begin with the fact that it seems to have almost no regard for the public concerns voiced during the scoping period, other than to list them in each section of Chapter 4 and again in Appendix B. The "plan" ceases to reflect a response to any of these issues, but conversely, nearly mimics the demands set forth by the Operators in their Proposed Alternative. Unfortunately, I found the whole document to read more like an elaborate sales pitch, touting the merits of Alternative C over Alternative B, and especially over the No Action Alternative, while trying to convince the reader that the massive increase of development will be of little consequence to the surrounding area.

Though full of countless facts and figures, and long enough to discourage the most hopeful of readers, the tedious nature of the document seemed to serve more as a function to distract the reader from the fact that the document is more like a slow-moving novel, full of vague and hopeful language and assumptions based on predictions, with very few concrete plans for how important topics (such as off-site mitigation) will

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ACTUALLY be achieved. The “Performance-Based Objectives” are used as a blanket plan to mitigate impacts for all affected areas, yet the only topic they appear to cover is that of on-site reclamation and “stabilization”.

Of equal importance is the fact that there are no provisions laid out for what will happen if things do NOT go “just as predicted.” It is clear to see how different the present conditions are from what the BLM and Operators “thought might happen” when the 1999 PAPA DEIS was created (most notably through the gross discrepancies in the NO_x threshold of 693.5 tpy set forth in the 2000 PAPA ROD, and the ACTUAL current level of 3,512.4 tpy of NO_x – a fact which, conveniently, received almost no attention in the 2006 SEIS).

The text is littered with assumptions, and many of them are not even backed by accurate tests (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 contamination – 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, to name just a few). Meanwhile, pertinent data that HAS been gathered was often whitewashed or even 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 slaughtered in one shot last month; 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-watersheds prove to the contrary; and, of course, the infamous discrepancy between the projected and actual NO_x emissions levels, to name a few). Despite its length, the text contains no provisions whatsoever to ensure that the actions set forth in the BLM’s Plan do not greatly diminish the quality of life for the residents of Sublette County through such impacts as compromised water and air quality, loss of big

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game herds, increased traffic, crime and transient populations who could care less about what is left of this county after they are gone. Truthfully, I would think that those of you who call Sublette County your home would also be concerned with some of these issues, and the legacy you will be leaving for future generations.

I do not wish to be a “NIMBY’er”, concerned with this development just because it happens to be in my backyard. Honestly, if I thought that the BLM’s proposal for developing this area (and all the other similar areas around the West which are also being developed and destroyed at breakneck speeds) were the answer to this country’s oil dependency, or if it would put an end to the never ending wars in the Middle East, I would say “go for it” – but I am convinced that this is not the solution. The truth is there is not enough of the finite supply of fossil fuel in the country (or even in the world) to satisfy our endless demand of energy for the future. So, why do we continue to put all of our energies into reaping this non-renewable resource? Why not instead pace the extraction of oil and gas to sustain our demand over the next 50 or 75 years, while we aggressively work towards developing technologies which will allow for a future of sustainable power sources through renewable energy?

Instead, we have a catastrophic, Government-endorsed, industrial scale, modern-day Gold Rush going on, as if the oil companies are in a mad frenzy to extract and burn as much oil and gas as possible before it goes out of vogue. As a result our most precious resources are being compromised, maybe beyond recovery. I believe that the BLM must create, and then mandate the Operator’s compliance with, strict guidelines for drilling operations which will ensure the quality of life and protect the resources of the Tri-County area affected by the PAPA development.

I have grown weary of headlines these past few years which demonstrate time and again the BLM’s apparent policy to meet nearly every demand the Operators come up with. We have seen how past restrictions on winter drilling have been waived despite the downward trend in game populations dependent on this critical winter rangeland. As previously mentioned, we have seen the discrepancies between what the BLM predicted would happen in 1999 and what is actually happening. We have been told that since drilling and exploration has begun, there is a much clearer picture of what the future of the PAPA will be. Yet increasing the number of wells by nearly nine times will create a situation for which the BLM will likewise be unable to predict the outcome. Once again, however, the BLM is continuing its trend of making assumptions in the dSEIS for what the future

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“might be like”. How can we believe that these assumptions will hold any more validity than did those in the 2000 PAPA DEIS??

I strongly believe, therefore, that there needs to exist a new Action Plan, which allows for the “temporary relaxation” of drilling operations if things don’t go “just as planned”, and if human health, game populations and/or environmental degradation is at risk. It is time for the BLM to properly address the concerns of the People, on an equal level of importance as the demands of the oil producers. It is my sincerest hope that the state and local BLM offices will enable these concerns to be heard and included in the Final SEIS.

I am no scientist and no statistician, and thus found the SEIS extremely difficult to wade through, and I feel it is in err that the BLM does not give “opinions and preferences” a “formal response”. For example, just because a lay person cannot follow the tedious stats and tables in the SEIS, or offer scientific suggestions to amend methodology, does not invalidate their knowledge of, and concern for, the obvious compromised air quality and decreasing game populations which have resulted from current oil field activities, and which they have witnessed firsthand. Their “opinion” that an increase in the rate of production (before the degradation has been reversed) is not in their best interest should likewise receive valid recognition from the BLM. This stipulation sounds more like a convenient way for the agency to disregard the sentiments of the Public, who have the most to lose from the proposed development.

It is impractical to list every place the BLM has used vague, non-binding and open-ended language throughout the SEIS, but it is imperative that this kind of language be amended throughout the Final SEIS (e.g.: promises of zero LOP surface disturbances from the pipeline, while also admitting that much of the proposed corridor crosses droughty soils where reclamation would be difficult p. 3-86; “if at all possible, baseline data should be collected” App. p. E-6; “pad reclamation would proceed as soon as practical” and “operators would attempt to fully develop...before moving drilling rigs off pads” p. 2-23. etc.). 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. Then, 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

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“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 388 acres of disturbance thus far {p. 3-52} and another 1,304.4 acres of disturbances in store for the Viewshed p.4-55, to name a few). So, at the risk of not being scientific or specific enough, I am listing some of the most 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). This would allow for some non-fragmented habitat for the displaced game and birds, as well as binding the Operators to their proposal to consolidate operations within the core area.
- 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.
- 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.
- 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.
- Explicit requirements from the BLM for types of cleaner drilling techniques and deadlines for the utilization of these techniques. Other practices such as directional drilling, liquids gatherings systems, clustered development and

G-1
 M-1
 AQ-1/SW-1
 W-2
 LS-1/RC-1/W-1
 I-21-5
 I-21-4
 I-21-3
 I-21-2
 I-21-1

SW-3
I-21-11
AQ-2
I-21-10
RC-3
I-21-9
SW-2/GW-1
I-21-8
M-2/RC-2
I-21-7
SE-1
I-21-6
I-21-5

employee busing programs should not just come with massive increases in development levels, but should be mandatory components of any Action Plan. Judging by the revenues generated per well described in the dSEIS, there should be plenty of funds to upgrade ALL rigs to Tier 2 equivalent emissions (29 out of 48 rigs with this standard is not adequate). The use of Tier 2 rigs should be mandated for the near future, regardless of the number of rigs in operation.

- A slower pace of development to spread out economic benefits, allow for socioeconomic adaptations to, and responsible monitoring programs for drilling operations.
- A more extensive, more binding and more clearly defined approach to the performance based standards described in Appendix C of the dSEIS must be created, with emphasis on emission mitigation measures and reclamation requirements. Corresponding deadlines for compliance must be set and non-compliance consequences must be established and strictly enforced (e.g. the fact that the Operators were required by the 2000 PAPA ROD to test ground water within one mile of each well, and in six years, have only completed half of these test wells, is the kind of non-binding mitigation measures which must be amended and then adhered to).
- 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.
- 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 the complete financial burden of reclamation costs, including the costs involved with thwarting the spread of noxious weeds which result from surface disturbances.
- 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.
- A clear plan must be established for how wastewater will be safely disposed of, without compromising soil quality.

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I realize this has been a lengthy statement, but the dSEIS has left itself open to much scrutiny, and I have only scratched the surface. I am writing because I believe that our Public Lands possess more value than just the fossil fuels which may be exploited from them, and the riches that may be made from this exploitation. No one shall be immune from the negative repercussions that shall ensue if development such as that proposed by the BLM's Preferred Action Plan C is implemented. It is time to start setting a precedent on our Public Lands which displays a responsible management of all resources, while developing oil and gas reserves, thereby assuring the sustainability of these resources for future generations. Again, thank you for taking the time to read and consider my sentiments.

Sincerely,
Laurie Vigyikan

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