



"Dan & Jan Blair"  
 <danjanbee@eoni.com>  
 03/15/2007 03:49 PM

To "Matt Anderson" <WYMail\_PAPA\_YRA@blm.gov>  
 cc  
 bcc  
 Subject Comments to PAPA SEIS

TO: Matt Anderson, Project Lead  
 BLM Pinedale Field Office

FROM:

Dan & Janet W. Blair  
 P.O. Box 330  
 Joseph, OR 97846-0330  
 (541) 432-0605  
[danjanbee@eoni.com](mailto:danjanbee@eoni.com)

DATE: March 15, 2007

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Although we no longer live in Wyoming, we have been submitting comments on the Pinedale Anticline and Jonah projects each time they were solicited, and reviewed a draft of the PAPA SEIS recently. We are pleased to see that the BLM attempted to address some of the issues cited by concerned citizens, but the Draft SEIS certainly does not go far enough.

We were, for example, happy to note that a "core area" has been defined for focused drilling and development operations. However, there is nothing in the SEIS that precludes drilling outside of the core area. And a more careful reading reveals that actually, this SEIS has a virtual certainty of causing more damage than the present plan for the Anticline: a ninefold increase in development, virtually assuring air pollution for a portion of every year; a hugely expanded acreage resulting in a three-fold increase in direct land disturbance; no assurance that mule-deer and sage grouse would ever again be able to use the area (in fact, some pretty stark warnings that they may be completely out of luck under this plan). In other words, this SEIS certainly does not allow for multiple-use. It is strictly a plan for the energy industry, with one or two "sops" for environmental concerns (such as a clear effort to reduce truck traffic in the area via a system of liquids-gathering).

We place ourselves on record as being disappointed that the Draft SEIS fails to face up to these issues, and would like to see further changes as follows:

- W-1 | I-43-1 | • 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.
- W-2 | I-43-2 | • 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.
- G-1 | I-43-3 | • Making the performance-based objectives **enforceable standards** that hold industry accountable for its practices. As it reads now, it's pretty much a wink and a nod at the very real concerns of those who have submitted comments along the way of this process.
- AQ-1 | I-43-4 | • Requiring the best-available technology for **all** development, thus limiting emissions and protecting air quality and human health from gas-field air pollution. This is definitely a looming problem over quite a

G-2 M-1/RC-1  
I-43-6 I-43-5 I-43-4

wide area!

- Setting well-defined and **binding** mitigation requirements, including requirements for reclamation.
- Establishing requirements for phasing development over time and space to protect wildlife and air quality.

Thank you for allowing us to submit these comments.