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Pinedale Anticline Supplemental EIS
Bureau of Land Management
Pinedale Field Office
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Pinedale, WY 82941

Dear BLM:

I do support the BLM's decision to write a supplemental EIS for the Pinedale Anticline. Current natural gas development activities and their associated impacts have far exceeded what was expected in the Pinedale Anticline EIS and ROD of 2000. For this reason alone I believe current development activities should be reconsidered in a new EIS. The number of wells being drilled at one time has exceeded projections. The socio-economic, air quality and wildlife impacts resulting from this increased activity have also exceeded projections in the 2000 EIS. I am also concerned whether the acres of surface disturbance and its associated impacts to the range resource have exceeded projections, due to the increased size of well pads and lack of reclamation.

Shell, Ultra, Anschutz, and Questar are proposing an additional 6891 down-hole wells on the Anticline to drill-out their leases. The Pinedale Anticline ROD only analyzed 700 producing well pads. The operators are proposing to consolidate wells on fewer pads, with the use of directional drilling. Obviously, multiple wells would have to be drilled off of a single well pad, or the ROD would be completely gutted.

The operators are also proposing to use a pipeline system to gather produce water and condensate. This concept will greatly reduce truck traffic, which benefits both county residents and wildlife. However, with diesel at $3 per gallon and help hard to find this proposal is simply good business sense and public relations.

The operators have suggested that the reason for utilizing directional drilling and developing produced water/condensate pipelines is to mitigate impacts created by their true proposal, which is the elimination of wildlife stipulations. I believe the operators' proposals regarding well pads and pipelines make economic sense, and that is the reason they are suggesting them.

I do not support the elimination of seasonal restrictions on the Mesa, or the elimination of wildlife stipulations on the Pinedale Anticline.

T-1 I-19-1 I am concerned that winter drilling activities on the Mesa will create a safety hazard on County Road 23-110. This road in too narrow, and during the summer I was forced off of the road several times. In the winter, hitting the barrow ditch is not such a good

option. A few semi drivers and rig hands drive that road at break-neck speeds, and with icy winter conditions that could become a fatal problem.

The deer, antelope, and sage grouse should be given a break during the winter, when they are facing weather conditions which deplete their reserves. I know for a fact the more deer have to move in late Feb. and March the higher their mortality. The Sawyer Mule Deer study should be a good indication that winter drilling displaces deer, and quite possibly reduces mule deer productivity. I was amazed that Questar attempted to put a positive spin on the Sawyer study.

The elimination of sage grouse strutting and nesting stipulations will have a huge impact on the Mesa's sage grouse population. A sage grouse study was conducted by Matt Holloran concerning the impacts of natural gas development on sage grouse. One aspect of this study was lek use in disturbed and undisturbed areas. Natural gas exploration activities were allowed to continue during the strut, in the area surrounding the 3 – Lovatt Draw Reservoir Lek. In 1999, prior to extensive natural gas development, a maximum of 68 males and 71 females were observed on the lek. In 2004, after extensive development, no males or females were observed on the lek. The years 2004 and 2005 were very productive sage grouse years, but in 2005 only 1 male and no females were observed on the lek. This suggests that natural gas exploration and sage grouse strutting are not compatible uses of an area, when they occur simultaneously.

W-1 I-19-2

Wyoming has the most abundant sage grouse habitat and populations in the West, the Upper Green River Basin has possibly the best habitat in Wyoming, and the Pinedale Anticline is the center of the Upper Green River Basin. The United States Fish and Wildlife Service (USFWS) recently refused a petition to list the Greater Sage Grouse under the Endangered Species Act (ESA), but they continue to monitor actions occurring in sage grouse habitat. I am concerned that actions which eliminate sage grouse stipulations for natural gas development, in the heart of the best sage grouse habitat in the world, may sway the USFWS to list the Greater Sage Grouse under the ESA the next time a petition to list is filed. Environmental groups continue to look for opportunities to petition the sage grouse, and this will give them large ammo for their hired guns. Listing of the Greater Sage Grouse under the ESA would have catastrophic consequences for those of us who utilize BLM lands in Sublette County.

The operators propose more wildlife studies as a means to mitigate impacts resulting from elimination of wildlife stipulations. Wildlife studies may enhance our knowledge of species, but I haven't seen the reams of paper generated by these studies ever replace the habitat lost to development. Wildlife studies generally create more questions than they answer, and definitive interpretations are few, primarily due to the unlimited number of variables in nature. However, these wildlife studies do provide great public relations for the operators, and although these studies never feed any wildlife they do feed a few wildlife biologists.

GR-1 I-19-3 I have three concerns over future development on the Anticline from a range resource and livestock grazing perspective. One, I support alternatives which reduce the amount of surface disturbance, because that is direct loss of rangelands.

GR-2 I-19-4 Second, I would ask that the BLM be more diligent in ensuring that cattle movement areas are not blocked off as a result of development activities. Last summer, when the Mesa Common users were ready to move their cows off of the Mesa a pipeline was mounted on blocks, and effectively eliminated cattle movement. However, I noticed the pipeline the day before we were to begin our gather, and the pipeline company was very good about moving enough pipe to allow cattle movement. We have been assured in the past that these cattle movement areas would not be blocked, but nobody seems to coordinate anything with the livestock producers who graze the Mesa.

GR-3 I-19-5 Third, I remain concerned that a rush of off-site mitigation efforts will pressure cattle use on the rest of the Mesa. I hope a great deal of thought and coordination will go into any off-site mitigation project.

I support an alternative which respects the winter restrictions and wildlife stipulations currently in place on the Pinedale Anticline. I believe, increased directional drilling and piping of produced water/condensate should be a requirement of operators, due to the impacts created by development to wildlife and the range resource which are and will remain above those projected in the 2000 PAPA ROD.

My family has lived and worked on the Mesa for 100 years, and I am financially dependent upon the range resource which exists there. I believe, the impact projections in the 2000 PAPA ROD have been exceeded and will continue to be exceeded, based upon the drilling forecast presented to the public. I believe it is time the BLM made a readjustment.

We should not forget ALL the qualities which make the Upper Green River Basin so remarkable, by only focusing on the remarkable gas fields which occur in this area.

Respectfully submitted,

Albert Sommers