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02/28/2007 08:05 PM

To WYMail_PAPA_YRA@blm.gov
cc
bcc
Subject Comments on Pinedale Anticline SEIS

To: Matt Anderson, Project Manager

From: Shasta Pistey-Lyhne
741 Slater St.
Santa Rosa, CA 95404

Re: Comments on Pinedale Anticline SEIS

Mr. Anderson:

G-1 I-42-1 As a former resident of Pinedale, and a former inter with the BLM working on the Pinedale Anticline Working Group, I am disappointed to find that this issue has not yet been resolved by the Pinedale community. The question of increased wintertime drilling must be addressed to the degree that the proposal either is negated, or ALL of the environmental impacts are mitigated to a degree that the Proposed Action would have less environmental impacts than the No Action Alternative in order for this proposal to legally be allowed to move forward.

G-2 I-42-2 The degree to which environmental impacts are Significant and Not Mitigated is too high for this project to move forward, either legally, or with good faith toward the surrounding communities of humans and wildlife. I ask that the BLM reject the proposed project unless the corporation can produce mitigations that IMPROVE the environmental impacts of the current No Action alternative.

I also ask that the BLM address the following questions and comments:

G-3 I-42-3 *Liquid gathering systems should be used to collect condensate regardless of the alternative adopted, in order to mitigate environmental impacts of the plan (including the No Action alternative)

CU-1 I-42-4 *Cumulative impacts must be addressed between the PAPA and the recently approved infill project at the neighboring Jonah Field, calling for 3,100 new wells. A full EIS analysis of these cumulative impacts must be done in order to adequately mitigate the environmental concerns, especially of air quality, traffic, noise, light pollution, and wildlife impacts.

G-4 I-42-5 * The final decision for this EIS must clearly confine for the life of the project all new drilling and road building to only the designated "concentrated development area" that runs north-south down the spine of the Anticline.

I-42-6 * Socioeconomic impacts of increased drilling have not been properly analyzed. The long-term

boom-bust cycle of drilling in the West, and particularly in western Wyoming, will only be exacerbated by increased drilling in this area. Please produce data that answers the following questions:
-What will the timespan for drilling be under the No Action Plan? Under the Proposed Action? I-42-6 SE-2 SE-1 G-5
-What will the economic output be for the No Action Plan? For the Proposed Action?
-What will the economic returns be for Sublette County over the lifespan of the project under the No Action Plan? Under the Proposed Action?
-How will the drilling corporation mitigate economic fall-out after the lifespan of the drilling, due to a sharper, faster decline in revenues based on a shorter lifespan for drilling in these field areas under the Proposed Action? SE-3

* Habitat damage from drilling has already contributed to a documented 46 percent decline in the number of wintering deer on northern portion of the Pinedale Anticline. The Proposed Action undoes former mitigations put into place by previous projects. These projects must be re-evaluated for environmental impacts and additional mitigations must be added to the Project in order to fully address concerns about wildlife habitat loss. I-42-7 G-6

* Seasonal drilling restrictions must be maintained to reduce impacts on big game and sage grouse during the most vulnerable time of year. I-42-8 W-1

* Projected emissions of air pollution are neither reliable nor acceptable. We need rock-solid guarantees that industry will use the cleanest drilling technology available at the outset of the project and a promise that BLM will curb activity when established thresholds are breached. I-42-9 AQ-1

* The potential loss of archaelogical resources due to breakage of frozen soils is unacceptably addressed by the EIS. Mitigations must be adopted in order to fully comply with federal standards, and to respect the local tribes whose remains are in these areas. I-42-10 C-1

* Increased aquifer depletion and erosion will substantially impair the ability for humans, livestock and wildlife to obtain fresh water in Sublette County. The drilling corporation must include mitigations for loss of wildlife due to lack of fresh water resources in the drilling area. They also must include adequate mitigations to offset the losses to residents who rely on these aquifers for human and livestock consumption. I-42-11 GW-1 GW-2

Please address these concerns in your Response to Comments, and notify me upon the issuance of your Response to Comments.

Sincerely,
Shasta Pistey-Lyhne