P.O. Box 206
Cheyenne, WY 82003
113 East 20th Street

Wyoming Stock Growers Association
SGA

Phone: 307-638-3942
Fax: 307-634-1210
Email: info@wysga.org
www.wysga.org

**President**- Jon Kirkbride, *Cheyenne*
**Region I Vice President**- Ogden Driskill, *Devils Tower*
**Region III Vice President**- Garret Falkenburg, *Douglas*
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**Region IV Vice President**- Niels Hansen, *Rawlins*
**Executive Vice President**- Jim Magagna, *Cheyenne*

February 11, 2008

Bureau of Land Management
PAPA RDSEIS Project Manager
P. O. Box 768
Pinedale, WY 82941

Dear Project Manager:

The Wyoming Stock Growers Association (WSGA) appreciates the opportunity to provide comment on the Revised Draft SEIS for the Pinedale Anticline Oil and Gas Exploration and Development Project. WSGA has represented the interests of Wyoming's cattle industry for 135 years. Our roster of over 1000 members includes private landowners and BLM grazing permittees who are being directly affected by the development in the Pinedale Anticline Project Area (PAPA).

WSGA recognizes the critical importance of production of Wyoming's mineral wealth and the tremendous economic contribution, both public and private, that the oil and gas industry makes to our state. At the same time we are experiencing the significant impacts that such development is having on our industry. We believe that, through careful planning and coordination, the negative impacts can be minimized and positive long-term benefits can be realized. WSGA has made a commitment to the mineral industry to work cooperatively to achieve these results.

In particular, full development of the PAPA will affect area ranchers. Within some allotments, significant AUM's of livestock grazing will be temporarily lost. The potential for the introduction of noxious weeds will be enhanced. Some increases in erosion are likely. Displaced wildlife may have as yet unknown impacts on private lands. Livestock grazing patterns will change in some areas. Increased traffic, inadequate pit fencing and wanton destruction of private property are potential negative impacts. Each of these impacts can be mitigated to some extent.

WSGA believes that Ultra, shell and Questar have in good faith committed to an adaptive long-range planning tool that will provide the opportunity to both minimize and mitigate these impacts. Timely decision making that involves all affected parties including landowners and grazing permittees is critical to this process.

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In our earlier comments on the Draft SEIS, we supported the then Proposed Action as the alternative that we felt provided several advantages to livestock grazing in the area. Under the Revised Draft, we continue to support that alternative, Alternative D, which provides for year-round concentrated drilling. Our earlier comments regarding the need for careful coordination with grazing permittees, mitigation of impacts on livestock grazing, timely and effective reclamation and compensation for lost grazing opportunity remain applicable to this alternative.

Livestock use on the BLM lands within PAPA is seasonal. Therefore, winter drilling should reduce the level of overall activity during the grazing season. We anticipate less livestock disturbance, lower vehicular traffic, and less dust over the life of the project. The proposed Liquids Gathering System will play a significant role in further minimizing these impacts. In addition, less seasonality in the work force should enhance community stability and reduce the social problems associated with rapid growth. Hopefully, it will also assist in mitigating the current critical shortage of ranch labor in the area.

WSGA urges BLM to approve carefully planned and coordinated concentrated year-round drilling as the most appropriate approach to the development of the gas resources in the Pinedale Anticline area. Thank you for your consideration of our comments.

Sincerely,

Jim Magagna

Jim Magagna
Executive Vice President