



February 11, 2008

Caleb Hiner  
Project Lead  
Bureau of Land Management  
Pinedale Field Office  
1625 West Pine Street  
Pinedale, Wyoming 82941

**Re: Revised Draft Supplemental Environmental Impact Statement for the Pinedale Anticline Project Area**

Dear Mr. Hiner:

— G-1 —  
— BI-8-1 —

These comments are submitted on behalf of the Independent Petroleum Association of Mountain States and its 450 member companies regarding the Bureau of Land Management’s (BLM) Revised Draft Supplemental Environmental Impact Statement (RDSEIS) for the Pinedale Anticline Project Area (PAPA). IPAMS strongly supports conducting year-round drilling in the Pinedale Anticline Area as proposed by the Proponents. IPAMS incorporates and adopts by reference the comments of member companies Questar Exploration & Production, Shell Exploration & Production, Ultra Petroleum, and Newfield Exploration.

Natural gas is a vital source of energy and plays a crucial role in meeting the nation’s economic and environmental quality goals. The Pinedale Anticline is recognized as a vital natural gas resource, estimated to be the second largest in the United States, with enough natural gas to supply 10 million homes annually for the next thirty years. The development plan proposed by Ultra, Shell, and Questar would efficiently develop the estimated 20-25 TCF of recoverable mineral reserves while leaving the vast majority of the PAPA undisturbed for the benefit of wildlife and other resource values.

— G-2 —  
— BI-8-2 —  
— G-3 —  
— BI-8-3 —

Year-round access is the basis for the mitigation package offered by Ultra, Shell and Questar, the project Proponents. Many of these mitigation measures cannot be accomplished without the certainty of year-round access in the proposed development area. The Proponents must have the certainty of year-round access in exchange for providing the mitigation package. The final EIS must clearly articulate an alternative that provides for year-round access in specifically defined areas with the mitigation package offered by the Proponents.

The liquids gathering system (LGS) should be treated as a benefit rather than a negative impact. Recent studies on mule deer and sage grouse suggest that the LGS may be one of the largest benefits to wildlife. Seasonal stipulations do not seem to

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begin to make the difference for wildlife that the LGS does just by itself with year-round access in specific areas.

— G-4 —  
— BI-8-4 —  
In addition to addressing and discussing the many innovative and costly on-site mitigation efforts, the BLM needs to state in the final SEIS and the ROD that the application of directional drilling from pads and the LGS techniques clearly constitute avoidance, minimization and mitigation of development impacts because they reduce habitat fragmentation and human disturbance.

The benefits to wildlife and air quality which accrue from the mitigation measures offered by the Proponents are contingent upon year-round access and cannot be achieved with partial access. The Proponents have developed their monitoring and mitigation based on the premise that exceptions from seasonal stipulations for all species will be granted. The Wildlife Matrix agreed upon between the Proponents and the Wyoming Game and Fish Department (WGFD) will enable flexible management and mitigation response based on emerging impact changes over the life of the project. Through that agreement, the Proponents will provide financial support for mitigation and monitoring.

— W-1 —  
— BI-8-5 —  
On page 4-161 of the RDSEIS, BLM says that it does not intend to adhere to the sequence outlined in the Proponent/State of Wyoming matrix agreement and then proceeds to discuss the reasons in the next three paragraphs. This matrix tool was developed in concert with the WGFD which is the agency charged with managing the wildlife resources of the state. The WGFD holds not only the primacy over wildlife but is the expert in managing wildlife in this state. It is the opinion of the WGFD in co-advancing this matrix that it is the best tool to mitigate impacts to wildlife. We request that the three paragraphs be deleted or that the BLM explicitly reject Proponents' offer of the WGFD-approved Wildlife Matrix as a method of setting thresholds to allow for performance-based wildlife management.

— AQ-1 —  
— BI-8-6 —  
The Proponents' air quality mitigation commitments require long-term rig contracts that require the certainty of proposed year-round access. The Proponents' broad resource protection mitigation commitments were not offered to BLM in support of only specific species, specific situations, or partial access in the Development Areas (DA). These mitigations were purposefully developed to address air quality and protection for all species with seasonal stipulations and for year-round access within the specifically defined activity area in the DA.

— AQ-2 —  
— BI-8-7 —  
Alternative C in the RDSEIS requires that in addition to an 80% drill rig engine NOx emissions reduction, the Proponents will use "any and all available means" to ensure that visibility impacts will not exceed 1.0 deciview on any day (See Chapter 4, p. 4-82). This is not what was committed to by the Proponents with the Wyoming Department of Environmental Quality (WDEQ) concurrence. WDEQ has jurisdiction over air quality in the State of Wyoming and Proponents should not have to support ceding that authority through a NEPA process to any other entity – BLM or EPA. In addition, BLM has appointed EPA as one of the decision-makers throughout the air quality portion for Alternative D. Since WDEQ has jurisdiction, all such references should be deleted.

AQ-3  
BI-8-8  
Language on page 4-85 of the RDSEIS questions year-round access and would damage the Proponents' ability to make long-term commitments for emission reduction efforts. This language

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AC-3 BI-8-8  
could result in the Proponents having to reduce activity levels or take other drastic measures if there are no technologically and economically feasible or other reasonable means to further reduce drill rig engine emissions, despite the very significant investment in drill rig emissions reduction equipment and methods to achieve the 80% drill rig engine NOx reduction level.

IPAMS urges the BLM to approve the Proponents' year-round access request in designated areas with associated mitigation measure. The Proponents' proposal is an interwoven package that allows the components of each to work together effectively and economically providing for a balanced approach to energy development and protection of natural resources in the PAPA.

Thank you for the opportunity to comment.

Sincerely,



Kathleen Sgamma  
Manager of Government Affairs