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Caleb Hiner
Bureau of Land Management
Pinedale Field Office
PAPA RDSEIS Project Manager
1625 West Pine Street
P.O. Box 768
Pinedale, WY 82941

VIA EMAIL WYMail_PAPA_YRA@blm.gov

RE: PINEDALE ANTICLINE SDEIS

Dear Mr. Hiner:

On behalf of Public Lands Advocacy (PLA), following are comments on the Pinedale Anticline Revised Supplemental Draft Environmental Impact Statement (RSDEIS). PLA is a nonprofit trade association whose members include independent and major oil and gas producers as well as nonprofit trade and professional organizations that have joined together to foster environmentally sound exploration and production on public lands. PLA strongly supports the operators' proposal for continued development of the Pinedale Anticline Project Area (PAPA). Even though the project proposal emphasizes consolidated and year-round development (construction, drilling, completion, and production), the project proponents have developed a precedent-setting mitigation plan that protects wildlife and air quality in the Pinedale Anticline Project Area (PAPA) for the life of the project.

GENERAL

Online review of the RDSEIS has been severely hampered by the manner in which BLM posted the document. The size of the first document is over 22 megabytes which takes a long time to download, even for a newer computer. In the future, we recommend the Pinedale FO post NEPA and other documents by individual chapter, as other BLM offices have done, to facilitate online public access and review.

MITIGATION ANALYSIS

The project proposal submitted to BLM by the operators of the Pinedale Anticline Field proffers extraordinary mitigation measures specifically designed to protect sensitive resource values in the area, such as wildlife, habitat and other environmental values in exchange for year-round drilling in specific areas deemed most important to the project proponents. In order to successfully recover a projected 20-25 TCF of natural gas, the project proponents identified very discrete activity areas carefully chosen to allow the efficient development of the recoverable mineral reserves while balancing the other resources in the PAPA, leaving the vast majority of the PAPA undisturbed for the benefit of land-dependent wildlife and other resource values. As such, the operators' year-round access request in these designated areas

with associated mitigation measure 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.

Benefits to wildlife and air quality provided by the proposed mitigation measures are contingent upon year-round access and cannot be achieved with partial access. Exceptions from seasonal stipulations for all species are an integral part of the mitigation proposal operators developed for the project. The Wildlife Matrix agreed upon between the project proponents and the Wyoming Game and Fish Department (WGFD) was designed to track and *"proactively react to emerging impact changes early enough to assure both effective mitigation responses and a fluid pace of development over the life of the project"* (RDSEIS p. 10-5) and applies to current sensitive raptor and mammal species and sensitive sagebrush associated bird species, as well as game species. To accomplish this, the project proponents have offered to provide through the mitigation and monitoring fund *"assurance that financial support is available for mitigation and monitoring for the life of the project"*. (4/5/07 comment letter, Appendix D, p. 2). The air quality mitigation commitments require long-term rig contracts that cannot be executed with uncertainty of anything less than the proposed year-round access in the defined activity areas. The 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.

It is critical that the innovative and costly on-site mitigation components of the Proposed Action and as carried over to Alternative D—such as the Liquids Gathering System (LGS), directional drilling, Wildlife Matrix, mitigation and monitoring fund, etc., be more clearly addressed in Chapter 2 even though they are contained in Appendices of the RDSEIS. The other major on-site mitigation measures, such as interim and real-time reclamation, leaving lateral and linear migration corridors available, Bald Eagle and Raptor Best Management Practices (accurately described), computer-assisted operations, etc., presented in Appendices must also more clearly presented in order to highlight the key elements of the project proposal for purposes of impact analysis and for the benefit of the reader. BLM's failure to incorporate this information into the effects analysis makes it impossible to understand both the negative and positive aspects of the proposed action.

The Proponents have offered a well-thought out and balanced long-term plan that will benefit the environment, wildlife species, communities and business that rely on the PAPA. Ultra, Shell and Questar's economic interests in this project are acknowledged; however, their substantial voluntary mitigation commitments clearly demonstrate that they are not only interested in developing natural gas, but also to conduct this development in a manner that address all other sensitive resource concerns. To maximize the benefits of development to all of the competing resources—wildlife, environment, air and community—the BLM must not allow for the interests of a single entity to override the many long-term benefits to many that can be realized with the balanced project management plan provided.

WILDLIFE MATRIX

On page 4-161 of the RDSEIS, BLM indicates it does not intend to adhere to the sequence outlined in the Proponent/State of Wyoming matrix agreement. This matrix tool was developed in concert with and agreed to by the WGFD, which has primary authority over wildlife management throughout the State. It is our understanding that WGFD in co-advancing this matrix agrees it is the best tool to mitigate impacts to wildlife. Therefore it is unclear why BLM intends to reject the project proponents' offer of the WGFD-approved Wildlife Matrix as a method of setting thresholds to allow for performance-based wildlife management. We recommend that BLM accept the matrix tool as finalized by industry and WGFD.

LONG-RANGE PLANNING

PLA supports the long-range planning tool proposed by Ultra, Shell and Questar to use annual meetings to define the proposed 10-year rolling plan provided to BLM. Ten-year forecasting at the annual meetings will allow participants to accurately assess the future community need for roads, schools and housing. The responsibility of the operators, governing agencies and the community is to find the best balance possible among energy, wildlife, air and community. To create this balance, both the short-term and long-term benefits need to be considered in planning meetings. Predictable year-round access provides the certainty needed for operators and officials to make effective long-term planning decisions at these meetings. The planned activity levels from these meetings will be shared with the communities so that they can plan for future infrastructure needs based on the steady long-term population associated with year-round access.

AP-1 BI-10-5 We recommend that the annual meeting be recognized in Chapter 2 as a decisional meeting rather than merely another planning step in the decision-making process. It would be inefficient for BLM to unnecessarily draw out the process; these meetings are the appropriate vehicle to make timely project decisions.

UNFOUNDED CLAIMS

G-5 BI-10-6 We reject claims that oil and gas activity throughout the year does will result in the PAPA will becoming an industrialized area. It must be acknowledged that year-round access allows for temporary development of the natural gas resource in an efficient manner so that operators can begin to remove equipment from the field sooner that current operations allow. While we acknowledge there will be temporary disturbances and construction from year-round access, it must also be recognized that the overall timeframe in which the PAPA is subjected to heavy equipment and construction will be reduced.

CONCLUSION

G-6 BI-10-7 We strongly support the year-round access definition provided by the project proponents as an assurance that BLM not apply seasonal wildlife restrictions when approving permits in the requested specified areas for simultaneous operations, including drilling, completions, construction, pipelines, etc. The intent is to minimize impacts to wildlife, habitat and environment by allowing continuous operations on pads without interruption, keeping movement and human activity to a minimum and providing safe, effective and efficient development of the resource. We support project proponents' request for year-round access in specified areas which includes simultaneous operations (drilling, completions, construction, pipelines, etc.). We urge BLM to clearly describe and insert this definition into the Final SEIS and Record of Decision (ROD) and revise its selection of a preferred alternative from the current preferred alternative to the Proposed Action.

Sincerely,



Claire M. Moseley