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PINEDALE BLM
February 9, 2008
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Caleb Hiner, Project Lead
Bureau of Land Management
Pinedale Field Office
P.O. Box 768
Pinedale, Wyoming 82925

Dear Sir;

Please include my comments on the revised draft of the Pinedale Anticline SEIS.

While the document is extensive, I still have concerns as to how BLM will allow:

- 1. transparency of the planned development to demonstrate to the public that mitigation plans are effective, and how
- 2. BLM will be able to insure the enforcement of requirements on lease holders in developing the resource to best meet required standards that reduce impacts on other resources.

I am glad to see the BLM acknowledging that this field development still requires the agency to meet the mission statement and statutory responsibilities; I do not think that Alternative D is the most effective plan to prevent degradation of wildlife resources.

A key issue is that the crucial wildlife ranges and seasonal access be maintained which are now best controlled by seasonal drilling as maintained in Alternative E. Current studies as cited in this draft detail the on-going decline in the Mule deer herd numbers and that animals are currently increasing their distances from different sources of development and human disturbance (Sec 4.20.3.1, pages 4-150-151). Where are the animals suppose to go to find the suitable cover and forage resources to support individual deer and the herd as a sustainable unit?

There are cumulative indirect effects of adjacent leased surrounding the Anticline area that will reduce available area for mitigation. There were leases sold this past year along the Green River Drainage, Horse Creek, and Beaver Creek areas which will reduce undisturbed areas for wildlife use. Where in this draft are these impacts discussed?

The design of reserve pits for holding and evaporating contaminated waters need to be enclosed to prevent birds, wildlife and domestic animals from becoming trapped and poisoned by the fluids. While it is stated in the draft that no negligible effects have been noted, anecdotal information and personal testimony at public meetings have stated the opposite results. Eric Stinson stated at a public meeting on the Pinedale RMP that he had first hand knowledge of persons slicing holes in the liners resulting in increased drainage rate of toxic fluids into the ground surface. Cattle and deer have also be poisoned and died after drinking the fluids from the reserve pits. In a dry desert area, the current setup is an attractant to thirsty animals. The flagging is inadequate way of preventing wildlife from using the pollutants and this system needs to be changed.

The annual meetings as described on pg 4-85 of leaseholders and agencies need to have a component for pubic information and input. We all have a vested interest in the best use of the

MO-1 M-1 I-2-1

W-1

CU-1 I-2-3

G-1 I-2-4

I-2-5

AP-1 | Anticline Area, not just those benefiting from its development as an industrial site. *There*
I-2-5 | *should be public input into these annual meetings to ensure transparency and that best*
I-2-6 | *practices are being implemented in a timely manner.*

M-2 | *The alternative that best approaches the resource development is Alternative E but the*
I-2-6 | *concerned public should have the assurance that mitigation measures are in place and*
I-2-6 | *effective.*

Sincerely,
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