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I-4

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Mr. Caleb Hiner, Project Lead
Bureau of Land Management
Pinedale Field Office
1625 West Pine St.
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Pinedale, Wyoming 82941-0768

Re: PAPA SEIS

Dear Caleb:

Thank you for the opportunity to read so many more pdf's.

I would point out your alternatives are artificially crabbed, and you still haven't explored all the reasonable ones.

For instance, Alternative E only looks poor relative to the three Alternatives derived directly from the Operator's apparent proposal because it lacks a fluids collection system. This might be understandable given the economic realities in Alternative A, which doesn't allow for the fullest recovery of the resource, but Alternative E allows for the same level of production as Alternatives B, C and D.

Also, I have to question why only Alternative D offers the highest levels of protection to Wind River Range and other airsheds given that B, C, D and E could all offer the Operators a nearly complete recovery of the resource. I can see no rational justification or discussion in the document of the BLM's thinking re: why Alternatives B and C (never mind E) also would not reduce emissions to a level where they would be in compliance with the existing regulatory regime.

As I have pointed out before it seems the Operators are proffering compliance with their existing legal obligations as if these so-called concessions are legitimate. It is a basic tenet of the law of contracts that pre-existing obligations (i.e. Ted will not shoot Fred in cold blood or Company X won't pollute the Green River with arsenic) cannot suffice as adequate consideration to form a binding and enforceable contract. So why the fuss about the Operators using equipment that they should have been using all along given the admitted impacts (as well as impacts that will result from increased activity)?

There are numerous potential environmental impacts that I cannot find adequate discussion of—in fact discussion of some issues is not to be found at all—while I instead find numerous tables of tax revenue or jobs and socio-economic discussions. What discussion of environmental impacts is to be found in the preferred alternative seem to

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minimize the impacts and/or proffer that these impacts can always be eliminated or mitigated.

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Perhaps the biggest issue facing the physical environment in the Upper Green River Basin is the *pace of development*, and it is troubling that there is little variance between the alternatives, this despite numerous comments by local politicians and political entities that the de facto pace is already too much (as you know the SEIS would increase development past the current rate).

As for what the Anticline will look like in 70 years, what can I say except to point out that there is only one complete sentence in the first eight pages of the BLM's reclamation plans—Appendix 8.¹ That and your reclamation plans only seem to involve slinging seeds!

Sincerely,

Evangelos C. Germeles

P.S. It also appears you have not used the best available science re: sage grouse.

P.P.S. What about the hundreds of toxic waste disposal sites, a.k.a. well pads?

¹ True, you left one “intentionally blank.”