

## Karen Rogers and Ted Porwoll

PO Box 513  
Pinedale, WY 82941

T 307 367-2038

krogers@wyoming.com

February 10, 2008

Caleb Hiner, Project Lead  
Planning and Environmental Coordinator  
Bureau of Land Management, Pinedale Field Office  
PO Box 768  
Pinedale, WY 82941

Dear Caleb,

Respectfully, we submit our comments for the Revised Draft Supplemental Environmental Impact Statement (RDSEIS) prepared for the area that used to be known as the Mesa. This area has served as a refuge to people and animals for thousands of years, as recent archaeological research is showing in the Pinedale Anitcline Project Area and adjacent Jonah Field. It has long been known to offer prime winter habitat for biggame species. It offers world class year-round habitat for the Greater Sage Grouse, which may be listed as Endangered by the end of the year. The air quality in the Upper Green River Valley has historically been among the best in the country, as has been shown by long term monitoring in the area. Locals speak of a time not too long ago when they could regularly see up to 150 - 200 miles to the south on a clear day. All this changed in the late 1990's as a result of land management decisions made by your agency.

Now the county's population has boomed in the double digits. Our schools are busting at the seams, and substance abuse is rampant in our small town. Sage grouse numbers have declined, mule deer populations are down almost 50%, and visibility is impaired almost daily for months in the winter and frequently in the hot summer. Surface disturbance in the PAPA is estimated at 2%, and activity is mostly limited in the winter months. Severe impacts have occurred in the project area already, and you continue the absurd position to support such constant and rapid development without the workforce necessary to support such activity, from permitting to field enforcement. We feel there are several outstanding issues pertinent to the SEIS and which alternative(s) should be chosen. If the BLM continues down its current path, effects will be grave for us, our children, this beautiful place we like to call home, and the qualities that make it so unique. We urge the decision makers to select a mixture of Alternatives D & E to best protect our natural resources for generations to come.

From day one, the operators proposing this project have boasted the benefits to wildlife. But if you look at the trends obvious in today's best available science, wildlife are struggling to cope with the development already permitted under the guise of 'no impacts'. There is NO scientific evidence that suggests winter drilling is a good idea. Big game takes it the hardest; crucial migration routes, staging areas, and crucial winter range for mule deer and antelope are seeing more traffic, creating more pressure on these stressed out animals. Research shows that the Mesa Mule Deer herd numbers are down by nearly half since intensive development began on the Mesa in 2000. This winter is shaping up to be the harshest for area wildlife since development on the Mesa took off. BLM should wait and see if we still have a viable herd next spring before decisions are made that may effect this world class resource for decades to come. We encourage BLM to consider a more phased approach to development on the Mesa and strict adherence to winter range closures there. The current trend towards unbridled development in the area is also disconcerting with regards to the amount of traffic that would accompany the preferred alternative. Even if operators can successfully reclaim ground disturbance in the patch and create habitat elsewhere with the mitigation dollars promised by industry, which we seriously doubt is possible anyway, wildlife are not likely to fair well with all the increased winter activity and traffic in the area. At a minimum mitigation monies should be used to completely re-fence the 20 mile stretch of US 191 from Boulder to Daniel to help reduce roadkill.

Sage grouse used to number the thousands in the Jonah Field; research paid for by the companies shows they have all been driven off or died. Sage grouse on the Mesa will share the same fate if more drilling is allowed, which is a shame given it's one of the last and best strongholds for the species. Research also shows that sage grouse abandon leks when activity gets too close. There is no way the Anticline can be drilled out as proposed with no impacts to sage grouse. This upon the heels of the announcement that the USFWS may decide by the end of the year about listing the species. Dense drilling activity anywhere on the Mesa is going to have severe impacts on the sage grouse population. Only one well should be allowed per section across the project area, with even larger buffers used around the leks (two miles at the least, while three miles is better). It's not rocket science that if the birds can't reproduce, they can't maintain their

- W-2 I-12-3 populations. Whether it's for mule deer, antelope, sage grouse, or raptors, seasonal restrictions **must** be followed to respect winter survival and reproduction rituals. We suggest a combination of Alternatives D & E to best protect our wildlife.
- AQ-1, AQ-2, AQ-3, AQ-4 and AQ-5 I-12-4 Air Quality in the Upper Green has already suffered greatly from energy development in the area. How can BLM permit a project, which modeling has shown would, cumulatively, along with other permitted projects and regional sources, impact visibility in the class I Bridger Wilderness between 60 and 90 days a year and also impact visibility in five other Wilderness Areas, two National Parks and Tribal Lands on the Wind River Reservation? The Clean Air Act does not provide for BLM to permit a project which threatens to severely impact Air Quality Related Values in a class I area. How does BLM propose to mitigate air quality impacts to the Bridger and other Wilderness Areas and National Parks? What are the impacts to human health as a result of high ozone levels, NOx and SOx levels? BLM needs to establish Best Management Practices (BMP's) which can ensure that no additional visibility impacts occur and that air quality is protected; these BMP's should be identified in the Final SEIS for the Anticline, and field development should be phased based on industry's ability to reduce emissions significantly and maintain, at least, no net degradation to visibility. A cap on emissions from all area sources should be considered to prevent violation of National Ambient Air Quality Standards in the area and to provide protection for Air Quality Related Values in our Wilderness Areas and National Parks. We believe alternative D would be best for protection of the area's air quality.
- WQ-1, WQ-2, WQ-3 and WQ-4 I-12-5 We do not believe any of the alternatives addresses water quality adequately. We do not agree with plans to drill new injection wells in the area to dispose of water already being produced by existing wells. No assurances have been made that water quality will be protected by drilling even more wells, up to 10 times as many, in the area. Water is proving that it will soon rival natural gas as a commodity down stream, how will BLM protect this valuable resource? Little is known about how these millions of gallons of produced water will effect local ground, and ultimately, surface waters. Does BLM have the resources to ensure that stipulations are being followed and that produced water and condensate are being handled and disposed of properly? BLM should identify clearly how they and their partners, Wyoming DEQ Water Quality Division, plan to monitor and regulate industry to ensure that water quality is being protected. Any degradation of water quality should not be allowed. We believe that the produced water issue has not been sufficiently analyzed and that this lack of planning threatens the water quality of those who live in the area as well as those downstream. BLM should consider stricter stipulations concerning reporting and handling of produced water and condensate. We would also like BLM to disclose how much drilling fluids and other materials will be left on sites in reserve pits when drilling is completed. How will BLM and industry ensure that monitoring of these reserve pits will continue to take place after production begins to taper off? Is there enough bond money required from industry to guarantee that our water resources are adequately protected in the future from activities that would be authorized by BLM in this SEIS? BLM should require that industry identify what materials are contained in the fracturing fluids used by operators so that the threats to water quality from these fluids can be sufficiently analyzed.
- LS-1 I-12-6 Prudent land management decisions must also be made regarding the lease status and availability for the small percentage of the project area that is not leased or up for lease expiration. Any leases not currently held by production should be allowed to expire or at the very least have the most current stipulations applied to them. No additional lands should be leased. There is plenty of activity already and plenty of money being made. We really do not have to throw out the baby with the bath water, do we?
- CU-1 I-12-7 Cumulative Impact analysis is short sighted. Impacts from the PAPA are evaluated in a vacuum from the grave impacts already seen in the Jonah Field. If you were to really acknowledge the impacts to the air, water, soil, wildlife, recreation, and community, there is no way you could continue to drill at the rate proposed. It's time the BLM comes clean about the impacts from all its bad decisions, not just this one.
- SE-1 I-12-8 Discussing the socio-economic impacts could take up a whole volume. Suffice to say that we have had all we can take and the community of Pinedale would like a break from the deluge of workers and traffic. Teachers struggle to keep up with new students and their disabilities, which are more common from transient families. Our law enforcement, emergency services, education, and social services are strained from the growth we have seen. To add fuel to this fire and permit more activity is ludicrous. In the current world of global warming, increasing fuel prices, and the end of the fossil fuel industry as we know it, we CAN afford to slow the pace of development.
- G-2 I-12-9 We insist the BLM must use the best available science in using a variety of approaches to ensure companies are using every mitigation tool possible, from directional drilling to seasonal restrictions to a liquids gathering system to remote monitoring, and then some. If it will help, it should be required. This should also be requested management of State of Wyoming lands within the project area. If the State and Governor truly care about the state's wildlife, they should require the companies to adhere to the same BMP's as the BLM does on its land, regardless of which alternative is chosen. We strongly urge the BLM to select the best of Alternatives D & E to protect what's important to us, the citizens of Sublette County.

Sincerely yours,

Karen Rogers & Ted Porwoll