Normally Pressured Lance Natural Gas Development Project

Scoping Report

June 2011

BLM

Wyoming Pinedale Field Office

The BLM manages more land – 253 million acres – than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western States, including Alaska. The Bureau, with a budget of about $1 billion, also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's multiple use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

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NORMALLY PRESSURED LANCE (NPL) NATURAL GAS DEVELOPMENT PROJECT

Scoping Report

U.S. Department of the Interior
Bureau of Land Management

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June 2011

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ACRONYMS AND ABBREVIATIONS

APD	Application for Permit to Drill
BLM	Bureau of Land Management
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FLPMA	Federal Land Policy and Management Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOI	Notice of Intent
NPL	Normally Pressured Lance
NRHP	National Register of Historic Places
ROD	Record of Decision
ROW	Right-of-way
SHPO	State Historic Preservation Office
U.S.	United States
U.S.C.	United States Code
WGFD	Wyoming Game and Fish Department

1.0 INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the United States (U.S.) Department of the Interior (DOI), Bureau of Land Management (BLM), is preparing an Environmental Impact Statement (EIS) to address potential effects of a project proposed by Encana Oil & Gas (USA) Inc. (Encana). The proposed natural gas development project is located within what is referred to as the Normally Pressured Lance (NPL) Project Area, adjacent to the Jonah Field, approximately 35 miles south of Pinedale, Wyoming and is referred to as the NPL Natural Gas Development Project (NPL Project). The Project Area comprises approximately 141,000 acres of BLM-administered lands in the Pinedale and Rock Springs Field Office areas as well as state and private lands. It is generally located within Townships 27 through 29 North, Ranges 107 through 110 West, 6th Principal Meridian in Sublette County, Wyoming (**Map 1**). In compliance with NEPA, preparation of the EIS and associated Record of Decision (ROD) will enable the BLM to make future decisions that approve, modify, or deny anticipated Applications for Permit to Drill (APDs) from Encana and associated rights-of-way in the Project Area.

Encana proposes to drill natural gas wells within the Project Area on an average of four multi-well pads per 640-acre section of land (approximately 3,500 wells). Each multi-well pad would average 18 acres per location. The wells, along with associated infrastructure, would be constructed over a 10-year period at a rate of up to 350 wells per year based on an average of 10 drill rigs working at any one time, or until the resource base is fully developed. Encana predicts an average life of 40 years per well. The extent of development will in part depend on the content of the EIS, ROD, and future permit decisions, including any environmental restrictions or limitations imposed by the BLM for operations proposed on BLM-administered lands.

The associated facilities proposed in the NPL Project include roads, gas pipelines, powerlines, and separation, dehydration, metering, and fluid storage facilities to the extent such facilities are not already constructed. Hydrocarbons and associated liquids would generally be transported via subsurface pipeline to consolidated or individual compression, processing, and treatment facilities. Produced water would be transported by truck or pipeline to produced water disposal wells, discharged on the surface under appropriate permits, or transported to onsite evaporation ponds. NPL Project development could result in the use of roads previously constructed and currently used in the Project Area as well as the construction of new roads. New roads are expected to consist primarily of access roads, using existing arterial roads for main access to the Project Area.

In compliance with NEPA, as amended, the BLM published a Notice of Intent (NOI) to prepare an EIS for the NPL Project in the *Federal Register* on April 12, 2011 (Appendix A). Publication of the NOI initiated a 30-day formal public and agency scoping period (end date of May 12, 2011), during which the BLM solicited comments regarding the NPL Project and its potential impacts. While the BLM accepts and considers public comments throughout the NEPA process, this scoping report summarizes scoping comments received through May 19, 2011 (15 days after the last scoping meeting). The EIS will disclose the potential impacts associated with the proponent's proposed action and other reasonable alternatives.

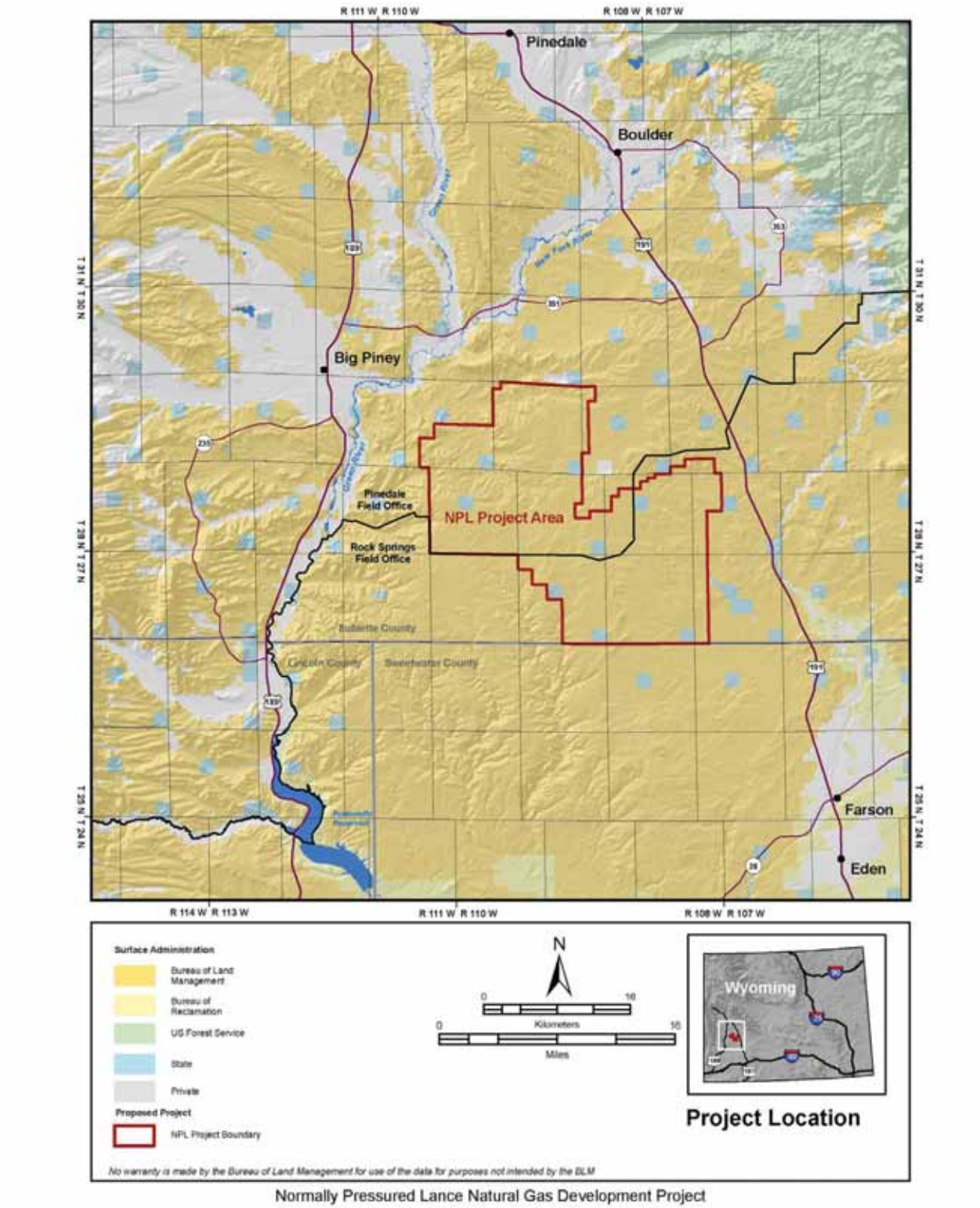
1.1 Purpose and Need for the NPL Natural Gas Development Project

The BLM's purpose is to respond to a proposal by Encana to develop and extract hydrocarbon resources underlying Encana's federal oil and gas leases within the Project Area. The need for the action, established by BLM's responsibility under applicable mineral leasing and development statutes,

regulations, and policies, is to recognize the right of federal oil and gas leaseholders, within the limits of lease terms and conditions, to drill for, extract, remove, and market federal hydrocarbon resources.

The BLM will decide whether to approve, approve with modification, or deny Encana's proposal and if approved, determine the conditions of approval associated with the action. Subsequent to a ROD, the BLM will require site-specific APDs and other necessary permits and authorizations, as required by applicable statutes and regulations, to develop hydrocarbon resources in the Project Area.

Map 1. NPL Natural Gas Development Project Location



Normally Pressured Lance Natural Gas Development Project

2.0 SCOPING PROCESS

Scoping is required under NEPA as defined in Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] 1500–1508). The BLM NEPA Handbook (H-1790-1) provides additional guidance and direction on scoping as part of the NEPA process.

2.1 Purpose of Public and Agency Scoping

Scoping provides an early and open process for determining the scope of issues an agency will address in an EIS. Scoping is the process used to solicit internal and external input and comments on the issues, impacts, and potential alternatives the agency will address in the EIS and the extent to which the agency will analyze those impacts.

2.2 Purpose of Scoping Report

This scoping report describes scoping activities for the NPL Project, summarizes public and agency comments received during scoping, describes the analysis of those comments, summarizes comments by issue category, and provides a preliminary list of issues, concerns, and opportunities for analysis in the EIS. During the EIS preparation, the BLM will consider all substantive issues raised by commenters that are within the scope of BLM decisions.

2.3 Notification and Scoping Meeting Advertisements

The formal scoping process began with publication of the NOI in the *Federal Register* on April 12, 2011 (Appendix A). The NPL Project scoping period ran from April 12 to May 12, 2011, and the BLM accepted comments and included them in this scoping report if the comments were received within 15 days after the last scoping meeting (by May 19, 2011). The NOI notified the public of the BLM's intent to prepare an EIS for the NPL Project, provided information on the proposed action, described the purpose of the scoping process, and identified methods to provide comments (Appendix A).

As part of the scoping process the BLM hosted scoping meetings for the public and other interested parties to learn about and submit comments on the NPL Project (see Section 2.4, Scoping Meetings). The BLM advertised the scoping meetings using a variety of outreach materials (e.g., postcard, website). The outreach materials provided an overview of the proposed project; provided meeting locations, dates, and times; explained the purpose of the scoping meetings; identified methods for making comments; and provided contact information for questions regarding the NPL Project. The following paragraphs describe each of the outreach materials; Appendix A includes copies of these documents.

Notice of Intent

On April 12, 2011, the BLM published the NOI to prepare an EIS for the NPL Project in the *Federal Register* initiating the scoping process. The NOI provided a summary of the NPL Project, identified preliminary issues, provided information on submitting scoping comments, identified the NPL Project website, and provided contact information for further project details.

Postcard

The BLM compiled a mailing list of approximately 500 contacts relevant to the NPL Project including federal and state agencies, tribes, non-governmental organizations, potentially affected property owners, and other stakeholders. The BLM prepared postcards (Appendix A) that provided information

about the project, announced the public scoping meetings, and provided contact information. On April 19, 2011, the BLM mailed the postcards to the contacts on the mailing list.

Flyers

The BLM prepared flyers that provided information on the NPL Project, identified scoping meeting dates and locations, and provided contact information. The BLM hung flyers at various locations in local communities to advertise the scoping meetings.

Website

The BLM Wyoming Pinedale Field Office website includes a link to the site-specific website for the NPL Project. The website includes the NOI, a description of the NPL Project, a map of the Project Area, and an electronic copy of the scoping flyer including scoping meeting dates and locations. The NPL Project website located at http://www.blm.gov/wy/st/en/info/NEPA/pfodocs/npl.html is one method the BLM will use throughout the NEPA process to communicate project news and updates to the public and interested parties.

News Release

On April 12, 2011, the BLM issued a news release entitled "BLM Pinedale Field Office Seeks Public Input on Proposed NPL Project." The BLM posted the news release on the BLM Wyoming online newsroom (http://www.blm.gov/wy/st/en/info/news_room/2011/april/12pfo-npl.html). The news release provided an overview of the project, information on scoping meeting dates and locations, guidance for submitting scoping comments, and contact information.

Cooperating Agency Invitations

Prior to the start of the scoping period, the BLM mailed cooperating agency invitation letters to federal, state, and local agencies identified as having special expertise or jurisdiction by law applicable to the NPL Project EIS (Appendix B). The letters notified potential cooperating agencies of the NPL Project, provided an overview of the NPL Project, invited participation as a cooperating agency, and provided contact information to submit questions. To date, the following organizations have agreed to participate as cooperating agencies on the NPL Project EIS:

- U.S. Environmental Protection Agency
- State of Wyoming and State Agencies
- Sublette County
- Sublette County Conservation District
- Sweetwater County
- Sweetwater County Conservation District
- Lincoln County
- Town of Pinedale
- Lincoln Conservation District

Tribal Consultation

Prior to the scoping period, the BLM mailed tribal consultation letters to potentially affected tribes formally initiating government-to-government consultation regarding the NPL Project (Appendix C). The tribal consultation letters provided an overview of the NPL Project; requested consultation and invited input on the NPL Project; provided contact information to submit any questions, concerns, or comments on the NPL Project; and offered the opportunity for a project site visit. The letters indicated that if

formal consultation is desired, the tribes should respond with a formal response letter stating tribal requirements, stipulations, and any recommendations concerning consultation to the BLM Pinedale Field Office. Subsequent to mailing the tribal consultation letters, BLM cultural resource specialists followed up with tribes through phone calls to establish contact and to offer meetings with the BLM to discuss the NPL Project. The BLM contacted the following tribes through mailing consultation letters and subsequent phone calls:

- Eastern Shoshone Tribe
- Northern Arapaho Tribe
- Shoshone-Bannock Tribes of Fort Hall
- Ute Tribe of the Uinta and Ouray Reservation

2.4 Scoping Meetings

The BLM hosted three scoping meetings held May 2-4, 2011 (Table 1). The scoping meetings gave agencies, organizations, the public, and other interested parties an opportunity to learn and ask questions about the NPL Project and to share issues and concerns with the BLM. The BLM used an open house meeting format to encourage broader participation, allow attendees to learn about the NPL Project at their own pace, and enable attendees to ask BLM representatives questions in an informal one-on-one setting.

BLM and Encana representatives were available at the meetings to answer questions and provide further information on the scoping materials presented at the meetings. Representatives from the BLM included the BLM project manager and members of the BLM interdisciplinary team from the Pinedale and Rock Springs field offices. Representatives from Encana included Encana project managers and technical staff.

Table 1. Scoping Meeting Locations

Date and Time	Location
Monday, May 2, 2011 5:30 p.m. – 7:30 p.m.	BLM Pinedale Field Office 1625 W. Pine Street Pinedale, Wyoming 82941
Tuesday, May 3, 2011 5:30 p.m. – 7:30 p.m.	Southwest Sublette County Senior Center 429 E. First Street Marbleton, Wyoming 83113
Wednesday, May 4, 2011 5:30 p.m. – 7:30 p.m.	BLM High Desert District Office 280 Highway 191 North Rock Springs, Wyoming 82901

BLM Bureau of Land Management

2.4.1 Scoping Meeting Materials

The BLM and Encana provided a variety of informational materials at the scoping meetings describing the NPL Project and the scoping process. Meeting attendees filled out registration cards (Appendix D) at the scoping meetings to document attendance and to be added to the mailing list if they so desired.

The BLM provided a fact sheet with information on NEPA, the scoping process, a guide to making effective comments, and the various methods to submit scoping comments. The BLM also provided six informational scoping boards for review during the open house meetings (Appendix D). The boards, posted on two large tri-fold displays, presented information on:

1. The National Environmental Policy Act
2. The scoping process
3. Making effective comments
4. Social and economic aspects of the proposed action (e.g., how many jobs would be created)
5. Biological aspects of the proposed action (e.g., descriptions of wildlife and vegetation in the Project Area)
6. Other resources potentially affected by the proposed action (e.g., water resources)

BLM displayed two large maps at the scoping meetings, depicting the project location and the Project Area.

Encana provided a fact sheet describing the proposed action, the location and components of the proposed action, and a project location map. Encana also provided three informational scoping boards at the meetings (Appendix D) that included the following information:

1. A description of the proposed project
2. A map showing the Project Area location and other relevant features (roads, topography, land ownership, proximate towns)
3. A description of the components associated with the proposed project (e.g., multi-well pads, pipelines, powerlines, access roads)
4. A graphic illustration of directional drilling depicting a subsurface cross-section
5. A description of job-creation associated with the NPL Project
6. An overview of Encana design features and project elements that are responsive to environmental concerns

Encana also provided a large 3-dimensional topographic-relief model of the proposed project depicting the Project Area.

2.4.2 Scoping Meeting Attendance

A total of 48 individuals (not including Encana, BLM, or consultants working on the NPL Project) filled out registration cards at the public scoping meetings. Table 2 summarizes the affiliations of scoping meeting attendees.

Table 2. Scoping Meeting Attendance by Affiliation

Affiliation	Pinedale Meeting	Marbleton Meeting	Rock Springs Meeting
No Affiliation Identified	9	5	1
Interest Group	2	2	-
Business	5	5	5
Federal Agency	1	-	-
State Agency	1	-	1
County or City Government	1	2	3
Elected Official (or representative)	1	-	3
Other[1]	1	-	-
Total	**21**	**14**	**13**

[1]Includes school districts, educational institutions, and other affiliations that do not fit into other groups (e.g., Pinedale Anticline Working Group)

3.0 SCOPING COMMENTS

3.1 Comment Document Collection

Although the formal scoping period ended on May 12, 2011, this scoping report includes comments submitted up to 15 days after the final scoping meeting. The BLM will continue to accept and consider all comments received during the NEPA process, to the extent feasible.

The BLM received 150 comment documents (scoping meeting comment forms, written comments, and email transmittals) as of May 19, 2011 (15 days after the last scoping meeting). Of the 150 submitted comment documents, 5 scoping-meeting comment forms were submitted at the scoping meetings, 1 scoping meeting form was submitted via mail after the scoping meeting, 22 comment documents were received via standard mail, and 122 comment documents were submitted to the NPL Project email address at NPL_EIS_WY@blm.gov (Table 3).

Table 3. Submission Method of Comment Documents

Submission Method	Number of Comment Documents
Email	122
Scoping Meeting Form	6
Standard Mail	22
Total Comment Documents Received During Scoping	**150**

3.2 Comment Document Submissions by Affiliation

Most comment documents came from commenters with no identified affiliation, including local property owners, grazing lease holders, and other members of the public (Table 4). Businesses submitted the second greatest number of comments followed by interest groups.

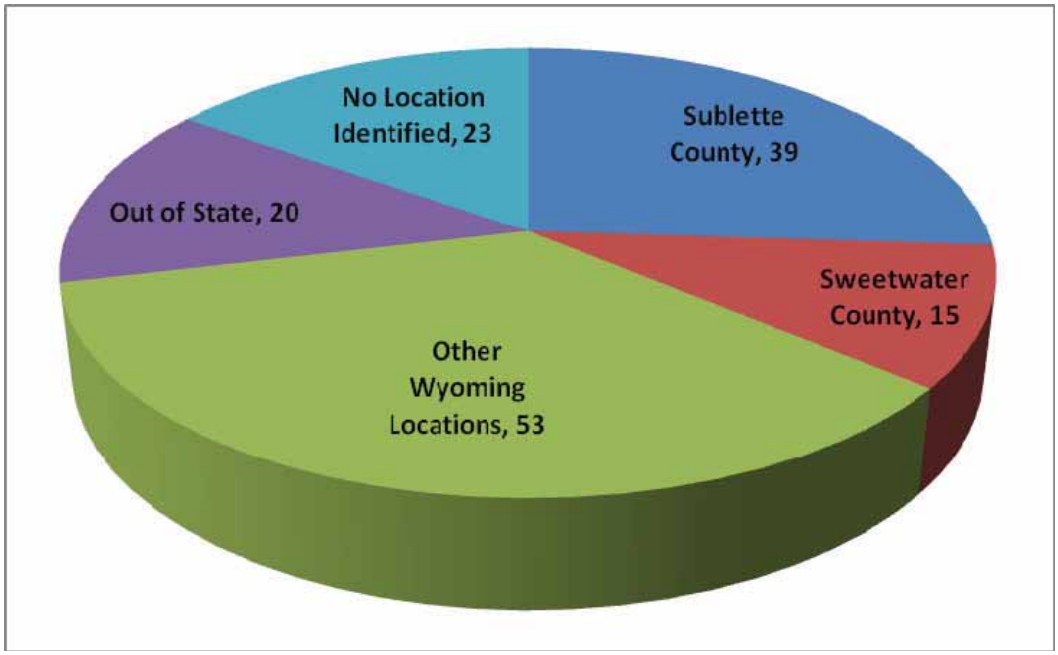
Table 4. Number of Comment Documents Received by Affiliation

Commenter Affiliation	Number of Comment Documents
No Affiliation Indicated	95
Business	24
Interest Groups	14
State Agency	4
Elected Officials (or representative)	4
County or City Government	3
Federal Agency	2
Other	4
Total	**150**

3.3 Comment Document Submission by Geographic Location

Commenters in Sublette County and Sweetwater County combined submitted more than one-third (36 percent) of the comment documents (Figure 1). Commenters from other Wyoming locations made up approximately one-third of comments (35 percent) and commenters from out of state and with no location identified accounted for the remaining one-third of comment documents received.

Figure 1. Number of Comment Documents Submitted by Geographic Location



3.4 Comment Summary

The BLM used a multi-step process to catalogue, organize, sort, and summarize comments submitted during scoping. The following nine steps describe the process used for processing comment documents, identifying and bracketing individual comments, and grouping comments into issue categories:

1. Receive and log data for each comment document.
2. Assign each comment document a unique identifier (referred to as a document number) for tracking purposes.
3. Electronically scan the comment document.
4. Review the comment documents and identify (bracket) each individual comment in the comment documents. Many comment documents included multiple individual comments.
5. Code each comment with an issue category based on the content of the comment. Issue categories are broad topics used to group comments expressing similar concerns (Table 5).
6. Enter all individual comments into a sortable database with applicable fields, including issue category, contact information, affiliation, submittal method, and other relevant information.
7. Sort comments by issue category (Figure 2).
8. Summarize comments by issue category in a narrative form to describe the general questions and concerns associated with each category (Section 3.4.3, Summary of Comments).
9. Develop issue statements to identify questions, concerns, and opportunities to address during preparation of the NPL Project EIS.

Table 5. Issue Categories

Issue Categories	
Air Quality	Recreation
Climate Change	Social and Economic
Cultural Resources	Soils
Cumulative Impacts	Special Designations
Health and Safety	Special Status Species
Invasive Species	Stakeholder Involvement
Land Use	Surface Disturbance
Livestock Grazing	Traffic and Transportation
Mitigation	Vegetation
NEPA Process	Visual Resources
Oil and Gas Operations	Water
Out of Scope	Wild Horses
Policies, Regulations, Permitting	Wildlife
Reclamation	-

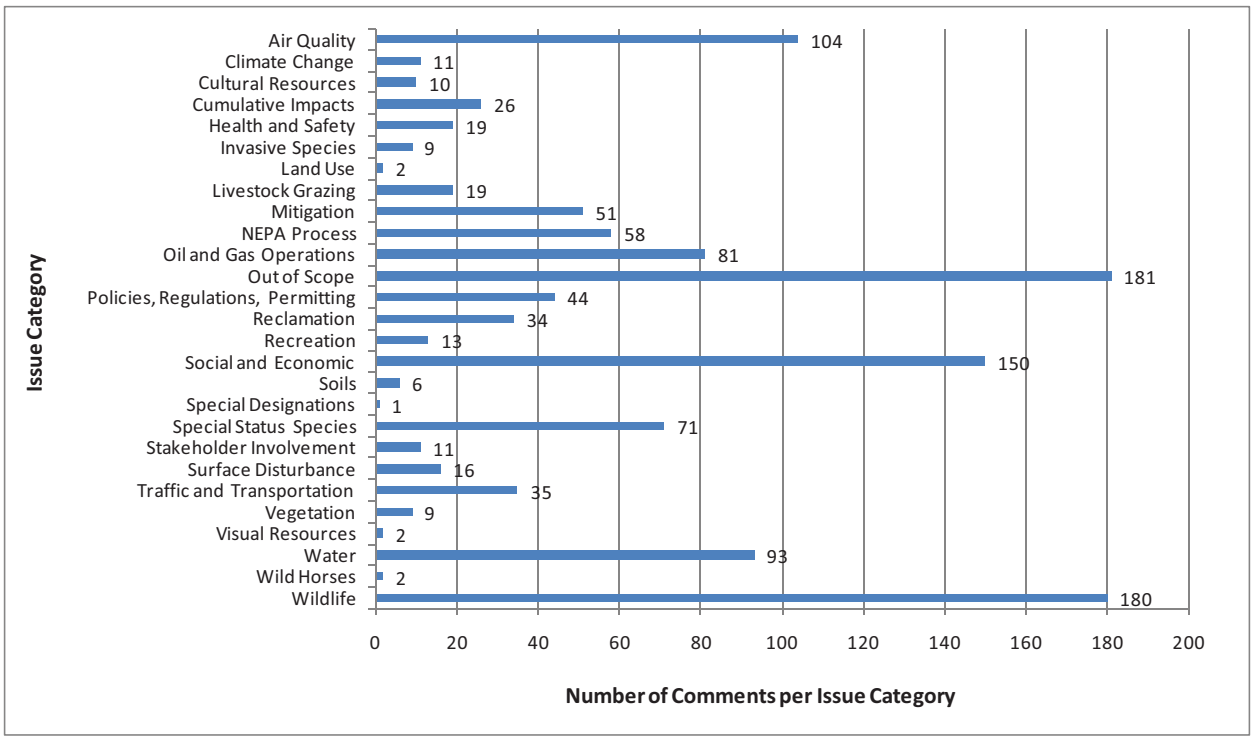
3.4.1 Comment Submittals by Issue Category

The BLM identified 1,238 individual scoping comments covering a broad range of issue categories. Table 6 and Figure 2 summarize the number of scoping comments identified by issue category. The greatest number of comments within the scope of the EIS were associated with wildlife (180), social and economic (150), air quality (104), and water (93). Out of scope comments (181) included general opinions of the project, comments on areas or projects outside the geographic range of analysis, comments on decisions and actions that will not be made in the EIS, and other comments that are not within the scope of analysis for the NPL Project EIS.

Table 6. Number of Comments per Issue Category

Issue Category	Number of Comments per Issue Category
Air Quality	104
Climate Change	11
Cultural Resources	10
Cumulative Impacts	26
Health and Safety	19
Invasive Species	9
Land Use	2
Livestock Grazing	19
Mitigation	51
NEPA Process	58
Oil and Gas Operations	81
Out of Scope	181
Policies, Regulations, Permitting	44
Reclamation	34
Recreation	13
Social and Economic	150
Soils	6
Special Designations	1
Special Status Species	71
Stakeholder Involvement	11
Surface Disturbance	16
Traffic and Transportation	35
Vegetation	9
Visual Resources	2
Water	93
Wild Horses	2
Wildlife	180
Total Comments Identified	**1,238**

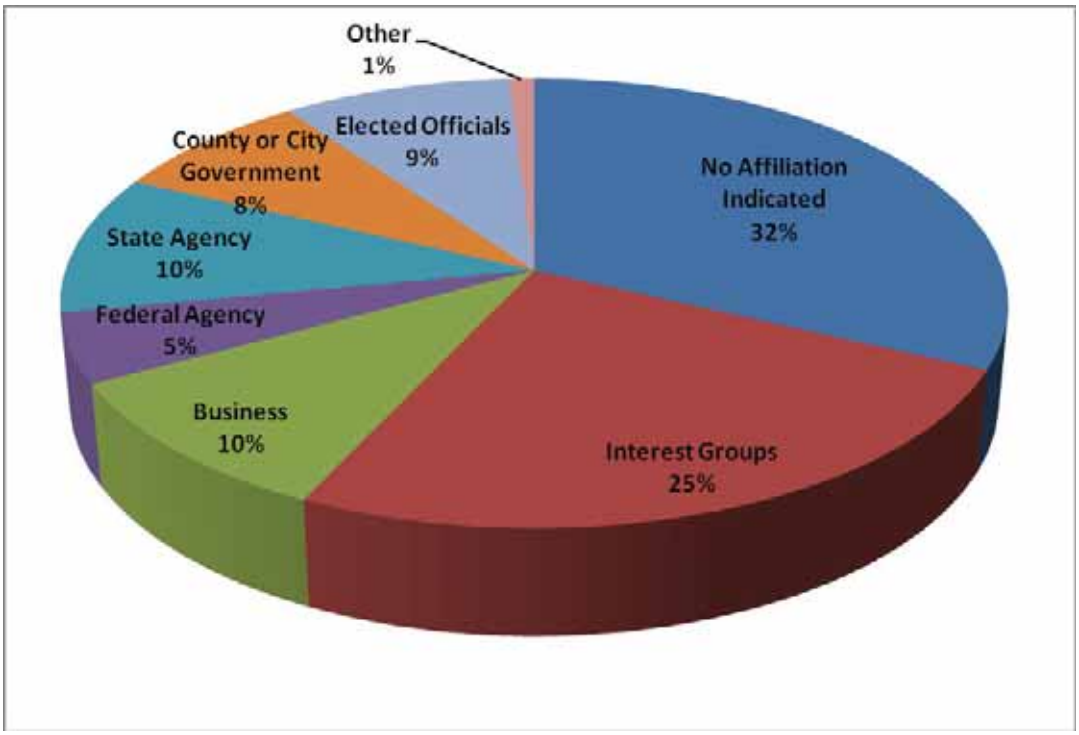
Figure 2. Number of Individual Scoping Comments by Issue Category



3.4.2 Comment Submittals by Affiliation

Individuals with no affiliation identified submitted the majority of individual comments, accounting for approximately 32 percent of total comments (Figure 3). Comments from interest groups accounted for 25 percent of all comments and commenters from state agencies, county and city governments, elected officials and business submitted a similar percentage of overall comments.

Figure 3. Percentage of Total Submitted Scoping Comments by Affiliation



3.4.3 Summary of Comments

This section summarizes comments submitted during scoping that are within the scope of the EIS. Comment summaries are grouped into issue categories based on the content and substance of the comment.

Air Quality

Many commenters acknowledged poor air quality conditions in the region, expressing their concern that the proposed project may exacerbate these conditions. Commenters indicated that ozone levels in the area have exceeded the National Ambient Air Quality Standard (NAAQS), noting that the project risks contributing to elevated ozone levels and potential violations of the Clean Air Act. Commenters also noted possible changes to the Clean Air Act that may affect the proposed project and associated EIS. Commenters expressed concern of the proposed project's contribution to visibility impacts in Class I areas in the region, including Grand Teton National Park and the Bridger Wilderness Area, as well as impacts from particulate deposition to biological and historic resources and acidification in alpine lakes. Commenters requested that the EIS fully characterize existing air quality in the region, including the aforementioned concerns as well as ambient concentrations of hazardous air pollutants, recent air quality trends, atmospheric chemistry issues related to air quality impacts, and sensitive receptors. Comments noted that fugitive emissions from existing oil and gas developments, as well as emissions from wood burning fireplaces and wildfires be included in the characterization of existing air quality conditions of the region.

Comments related to air quality impacts included requests for an analysis of visibility impacts, especially to National Parks, Wilderness Areas, and all Class I Areas as well as deposition and acidification impacts to sensitive locations, such as National Parks, near the NPL Project Area. One commenter noted the potential for odor impacts near the NPL Project Area. Comments also related more specifically to air

quality modeling as part of the impact analysis, requesting that models include quantitative air quality estimates for all hazardous air pollutants, incorporating emissions from a variety of sources such as construction operations, drilling, vehicles, and unknown sources (i.e., fugitive emissions). Commenters requested that air quality modeling employ dispersion modeling, clearly define all assumptions, and address fugitive dust resulting from the NPL Project. One commenter suggested an interagency air quality working group to develop an approach for the air quality analysis. Commenters raised the issue of air quality monitoring, suggesting that all hazardous air pollutants be monitored, all monitoring data for the region be used in the impact analysis, and that the Wyoming Department of Environmental Quality determine future monitoring site locations.

Commenters raised the issue of how the proposed project will minimize emissions, with a number of commenters indicating a preference that the NPL Project not increase emissions in the region and result in decreased air quality. Some commenters noted that the proposed project should employ technological measures to reduce emissions, including underground gathering systems, equipment to combust Volatile Organic Compounds, and electrical powering of facilities. Other measures suggested to reduce air quality impacts included limiting the use of equipment during certain time periods, mitigating emissions by reducing emissions from non-project related sources, paving roads to reduce fugitive dust, phasing project development, and applying best management practices (BMPs).

Climate Change

Commenters indicated that energy generated from natural gas emits considerably less carbon and other greenhouse gases compared to other traditional energy resources such as oil and coal. Multiple commenters noted that direct, indirect, and cumulative emissions of greenhouse gasses should be analyzed in the EIS and used to inform a climate change analysis. One commenter requested a description of regional climate change effects and recommended that the EIS identify any potential need to adapt the proposed action to these climate change effects, as well as any potential impacts from the proposed action that may exacerbate climate change. Commenters also indicated that the EIS should consider and analyze mitigation measures that reduce project-related greenhouse gas emissions. One commenter requested a comparison between the proposed action and any relevant regional, state, or tribal climate change plans or goals.

Cultural Resources

Comments related to cultural resources referenced the National Historic Preservation Act (NHPA) and the Native American Graves Protection and Repatriation Act for guidance and policy associated with cultural resources. Commenters expressed concern about impacts to the historic nature of the region and specific cultural-related resources including national historic trails and their cutoffs, archaeological sites and resources including “pit houses,” and the potential for encountering human remains. One commenter emphasized obligations under the NHPA to avoid historic places and suggested that mitigation is only an acceptable solution when avoidance has proven impossible. One commenter requested the development of a comprehensive cultural resource monitoring and discovery plan for the NPL Project. The commenter noted that such a plan should be made available for review by the public and those that have requested interested party status and that the plan should be attached to the NEPA document for the NPL Project.

One commenter suggested that well sites should not be placed within 5 miles of historic trails and sites eligible for the National Register of Historic Places as this distance is recognized as the foreground/middleground distance for the setting and is federally protected under the NHPA. Another commenter indicated that special care should be taken when developing in close proximity to the

Sublette Cut-Off of the Oregon Trail, located along the northern boundary of Sweetwater County near the NPL Project.

Commenters also indicated that appropriate tribes should be consulted to identify Traditional Cultural Properties and to develop appropriate protection for such sites, if identified.

Cumulative Impacts

A number of commenters emphasized the need for the EIS to include a thorough analysis of cumulative impacts. They specifically raised concerns over the cumulative effects of development in the region to wildlife (pronghorn, mule deer, and greater sage-grouse), native fish, water resources (related to both ecosystem health and domestic water supply), air quality, soils, transportation, outdoor recreation, and socioeconomic issues. Comments in regards to air quality cumulative impacts called for the EIS to analyze Teton National Park, all of southwest Wyoming, and ongoing monitoring in the Upper Green River Valley, Pinedale Anticline and Jonah fields, and the Bridger-Teton National Forest. Commenters suggested conducting the scope and extent of the cumulative impacts analysis at a landscape scale regardless of political boundary. Commenters requested that the cumulative impacts analysis incorporate all existing and reasonably foreseeable projects in the proposed project's surrounding areas including:

- Jonah Infill,
- Pinedale Anticline,
- Fontenelle,
- Big Piney/LaBarge,
- Riley Ridge,
- South Piney,
- Plains Exploration/Noble Basin,
- Jack Morrow Hills,
- Anticline Fields,
- the Moxa Arch Field,
- ExxonMobil's Shute Creek plant,
- Viva Naughton coal-fired power plant, and
- Hiawatha Regional Infill Development.

One commenter suggested that the cumulative impacts analysis address how various resource impacts may relate to each other (e.g., travel management relating to livestock grazing operations); another commenter requested that it include potential impacts to the Ross Butte Management Area.

Health and Safety

Many commenters expressed concern over the NPL Project's potential adverse effects to human health if it degrades air quality in the region. They raised the issue of the current state of air quality in the region (e.g., concentration of ground level ozone), and how human health may already be impacted, especially sensitive demographics such as the elderly. Commenters recommended that the NPL Project not result in any decline in air quality in the area. One commenter expressed support for using applicable scientific literature to analyze the effects of ground level ozone to human health; another suggested conducting a Health Impact Assessment according to World Health Organization Guidelines. One commenter also raised concern over the potential safety hazard of vehicle collisions with wildlife and suggested bridges and underpasses to reduce collisions.

Invasive Species

Commenters expressed concern over the introduction and spread of invasive species resulting from surface disturbance and dispersal of aquatic and terrestrial invasive species from NPL Project activities. Multiple commenters identified halogeton as a specific invasive species of concern noting impacts to livestock forage, rangeland health standards, and reclamation. Multiple commenters recommended

methods for controlling the spread of invasive species including washing and decontaminating equipment. One commenter recommended the development of a project-wide weed plan that specifies actions to prevent the spread and guide the control of noxious weeds and invasive plants. Another recommended complying with the Wyoming Game and Fish Commission's guidance to prevent the transport of aquatic invasive species.

Land Use

Commenters noted that the BLM should disclose any temporary or permanent land use changes in the EIS and appropriate resource sections should identify federal, state, and private land acreages and ratios.

Livestock Grazing

Commenters raised issues related to how the NPL Project may affect livestock grazing including impacts on lessee allotments, range improvements, and stock driveways; the effect of drill rigs on cattle; the potential for livestock displacement; and the effect of road improvement and development on ongoing vegetation improvement efforts. One commenter noted that the EIS should acknowledge the project's effect on allotments achieving the Wyoming Standards for Healthy Rangelands, while another suggested that the impact analysis should incorporate range science and the knowledge of local grazing permittees.

Commenters emphasized mitigating adverse effects to livestock grazing, with one comment suggesting the inclusion of mitigation measures agreed to in the prior NPL Environmental Assessment. Proposed mitigation measures included supporting vegetation and forage enhancement, developing produced water to facilitate livestock distribution, replacing any loss of hay meadows, coordinating hauling with affected lessees, compensating lessees for lost cattle, and limiting the likelihood of vehicular collisions with livestock by providing road crossings, signage, or speed limits.

Mitigation

Commenters emphasized the importance of mitigation measures to reduce potential impacts of the NPL Project. Some commenters emphasized prioritizing on-site mitigation over off-site mitigation, while a number of commenters raised various issues related to off-site mitigation including how far away from the Project Area mitigation should take place, various guidelines to follow and standards to adhere to for off-site mitigation, and the implications for counties from the purchase of private land for mitigation. A number of commenters recommended the creation of a mitigation fund and suggested various mitigation measures for which these funds could be used, including:

- retrofitting high pollutant emitting equipment in the county,
- providing compensation for lost grazing allotments,
- habitat enhancement,
- conserving historical and cultural resources,
- ongoing monitoring of wildlife and water resources, and
- compensating local governments for socioeconomic impacts such as increased public service demands as a result of the NPL Project workforce.

One commenter noted the success of previous mitigation banking efforts in the area that may apply to the NPL Project. Commenters also suggested a variety of on-site mitigation measures including vegetation enhancement, electric powering of facilities, emission minimizing equipment, fugitive dust

controls, a leak detection program, a workforce education program, and measures to protect surface water and groundwater.

Commenters noted that the EIS should discuss the effectiveness of proposed mitigation measures and explain the basis for recommending mitigation, include a mitigation plan, incorporate Council of Environmental Quality guidelines regarding how mitigation must be implemented, and identify specific mitigation requirements and BMPs applicable to the proponent for all phases and actions involved in the NPL Project.

NEPA Process

Commenters addressed several topics related to the EIS process. A number of comments supported completing the EIS in a timely manner by adhering to the NPL Project schedule. Multiple comments related to alternatives in the EIS including requesting consideration of a reasonable, broad range of alternatives; specific measures included limiting well density, excluding surface disturbance from sensitive wildlife habitat, phased development, incorporating central condensate collection facilities, and the use of well telemetry. One commenter noted that any development restrictions included in the alternative should be based on science and a demonstrated need, while another noted that any alternative that postpones development might not meet the purpose and need. While commenters voiced support of a no action alternative, one commenter noted that it is important for the EIS to recognize the no action alternative as the status quo by acknowledging current management of the Project Area. Commenters also recommended that the alternatives be feasible, meet the purpose and need for the NPL Project, and be as specific as possible.

One commenter emphasized the need to establish adequate baseline data for the NPL Project EIS. Comments associated with analysis of impacts included the use of best available science, adequate analysis of impacts to resources and resource uses (e.g., wildlife, social and economic resources) and the potential to conduct analysis and management at the landscape scale. Commenters indicated that the NEPA analysis should address reasonably foreseeable impacts from low probability catastrophic spills or other accidental releases of hazardous materials and a Spill Prevention, Control, and Countermeasure Plan should be prepared for the NPL Project. Commenters also indicated that the ROD be clear and deliberate and the purpose and need consider the proponent's objectives of developing and maximizing recovery of hydrocarbon resources.

Commenters emphasized public participation, suggesting that the BLM hold regular public meetings during the NEPA process and project implementation, allow adequate time for public comment and consider all public comments, and provide a public participation plan. A number of comments discussed the role of cooperating agencies in the NEPA process and necessary consultation with federal and state agencies.

A number of comments discussed the importance of defining what it means to minimize impacts and the need to consider methods to minimize impacts as part of the NEPA process. Commenters referred to the BLM's *Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development, 4th Edition* (commonly referred to as the "Gold Book") to provide guidance on minimizing impacts. One commenter indicated that if adaptive management is used, it should be defined according to how adaptive management will be implemented.

A number of commenters emphasized a need for compliance and consideration of BLM land use planning documents and other NEPA processes including the BLM Pinedale Field Office RMP and the Wyoming Greater Sage-grouse Management RMP Amendments currently ongoing. One commenter indicated that the Wyoming Greater Sage-grouse RMP Amendments might establish new requirements for greater sage-grouse conservation that should be considered in the NPL Project EIS. One commenter

referenced goals and guidance in the Sweetwater County Comprehensive Plan (2002) indicating that the NPL Project can be accomplished in a manner that balances resource development and environmental protection, consistent with the goals of the plan.

Oil and Gas Operations

Commenters noted multiple components of the NPL Project that will reduce potential impacts including emission reduction technology, collection and pipeline facilities, directional drilling, the use of natural gas-powered drill rigs, and covering and lining shallow reserve pits. Other commenters requested further clarification regarding certain aspects of the NPL Project such as well pad location and spacing, pipeline capacity, drilling plans, and the Project Area boundary. Comments related to well pads called for one well pad per square mile throughout the Project Area, developing multiple wells per pad, and the use of oak mats to reduce surface disturbance and reclamation time. Comments addressing road development encouraged co-locating facilities and locating roads to service multiple well pads. Commenters also advocated locating pipelines along existing utility corridors, minimizing the development of overhead powerlines, using alternative energy sources for powering facilities, and installing back-flow mechanisms on all well heads.

Multiple commenters voiced support for phased development over a longer period than that proposed, with some specifically discouraging the development of more than 25,000 acres at any one time during the life of the NPL Project. One commenter supported incorporating a combined heat and power approach to increase resource use efficiency, while another noted that using potable water for hydrostatic testing would reduce the risk of transporting aquatic invasive species.

Commenters acknowledged that NPL Project operations should adhere to all applicable regulations and incorporate BMPs.

Policies, Regulations, Permitting

Multiple comments discussed the need to consider state and federal regulations for the NPL Project. Commenters referenced the Federal Land Policy and Management Act (FLPMA), noting BLM's multiple-use mandate to balance resource use with resource conservation. A number of comments related to the NPL Project's compliance with policies or regulations including:

- Governor's Greater Sage-grouse Executive Order (EO 2010-4);
- Wyoming Game and Fish Department's Stipulations for Development in Core Sage Grouse Population Areas;
- BLM's regulations for leases, permits, and easements;
- Supreme Court precedent defining "minimize" and other relevant case law; and
- requirements of the Mineral Leasing Act and federal energy policy.

Commenters also noted additional regulations, policies and associated permit requirements in regards to Wilderness, Waters of the United States, stormwater, wastewater discharge, water supply wells, rights-of-way, construction permits, conditional use permits, and air quality permitting.

Commenters identified concerns related to BLM granting exceptions, waivers, or modifications to oil and gas lease stipulations. One group of comments indicated that exceptions should be a rarity while another comment indicated that any closures or restrictions be based on science and any restrictions should provide for waivers, modifications, or exceptions.

One commenter noted that under the Clean Air Act a federal land manager's authority is limited to considering if a proposed facility will have an adverse impact on visibility within designated Class I areas.

The commenter concluded that the State of Wyoming has authority in regulating air quality and BLM should acknowledge that it defers the regulation of emissions to the State's authority.

Reclamation

Commenters emphasized successful reclamation as an important component of the NPL Project. A number of commenters noted the difficulty in reclaiming disturbed areas in the Project Area. Comments acknowledged the long reclamation periods required, especially to reestablish vegetation to buffer overland flows and erosion potential and to reestablish sagebrush communities. One commenter noted the rapid establishment of noxious weeds after disturbances and the difficulties this poses for native species establishment, while another cautioned against stockpiling soil as it may result in degradation of the resource. Commenters advocated performance-based standards for reclamation that allow for adaptation and the use of mulching, irrigation, and native and nonnative seed mixes for interim mitigation to establish suitable environments for native plant communities. One commenter suggested coordination with Conservation Districts and livestock permittees during reclamation and revegetation efforts. Comments related to revegetation recommended the use of diverse reseeding mixtures with warm and cool season grasses, protecting revegetated areas from livestock, wild horses, and wildlife to facilitate plant establishment, and basing reseeding compositions on preexisting conditions and baseline vegetation inventories. Commenters also suggested that reclamation plans account for site-specific conditions, comply with the Wyoming Reclamation Policy, and include monitoring, by the proponent and BLM, and yearly reporting to gauge the success of reclamation efforts. Other comments advocated for the BLM's consultation with landowners, public land users, and appropriate state and county land agencies prior to reclaiming roads.

Recreation

Commenters expressed concern about impacts to various forms of outdoor recreation including hunting, fishing, off-highway vehicle (OHV) use, wildlife watching, hiking, and motorized access for recreation activities. One commenter recommended a project-development approach that allowed for outdoor recreation throughout all phases of development and one commenter recommended limiting truck activity during opening weekend for the big game hunting season. One commenter noted that the NPL Project boundary is entirely within pronghorn hunt area 90 and expressed concern about reduced hunting conditions if the NPL Project moves forward. One commenter suggested providing opportunities for dispersed recreation consistent with fisheries and riparian management objectives.

Multiple commenters noted that recreational use in the area be adequately described, including OHV use and other forms of outdoor recreation. Numerous commenters noted the importance of hunting and fishing to local economies. One commenter recommended consulting with the Wyoming Game and Fish Department (WGFD) as much as possible regarding hunting and other recreation related issues.

Social and Economic

Many commenters emphasized the potential benefits of the NPL Project to the state and local economies. Multiple commenters noted potential positive effects on local commerce and employment, local and state tax revenue, and supporting local communities from the NPL Project. Commenters mentioned that the NPL Project could help stabilize local communities by minimizing the boom and bust cycle, noting that it could maintain the employed workforce from the Jonah field. They noted that stabilizing employment eases stresses on public services and schools and positively affects property values. Other commenters acknowledged the positive effect of increased tax revenues on public services, especially schools. One commenter requested that the EIS analyze how taxes of the NPL Project would be allocated between the state and local governments.

Commenters also noted potential adverse effects to local communities from the NPL Project, including housing, social services, traffic, health care, and public infrastructure, with some advocating mitigating impacts to local communities according to already established guidelines and monitoring protocols. Economic impacts to tourism and outdoor recreation such as cold-water fisheries were also issues of concern. Other commenters suggested that the timeframe of the NPL Project and seasonal construction restrictions would perpetuate local economies' boom and bust cycles, calling for a development timeline that would better serve long-term economic growth. Comments also addressed more generally how the EIS should analyze socioeconomic impacts, such as which communities (e.g., unincorporated communities) and what kinds of data (e.g., updated census data) to include in the analysis. One commenter discouraged temporary residence for construction workers.

Soils

Commenters expressed concern over impacts to soils from topsoil removal and surface disturbance and identified various methods to minimize impacts including mowing vegetation rather than blading and methods to limit soil removal such as the use of mats or similar techniques. One commenter recommended the use of topsoil live haul (direct placement of freshly salvaged topsoil onto graded overburden in another area) to eliminate problems associated with stockpiling such as deteriorating fertility, micro-flora, and seed viability.

One commenter suggested the preparation of a site soil analysis prior to the removal of soil to determine the proper amount of soil for removal. The same commenter noted that the BLM should provide for immediate site stabilization after disturbance based on a site soil analysis, weather, slope and other relevant information and further provided methods and recommendations for site stabilization and revegetation. One commenter suggested that roads be paved when they serve more than five well sites to reduce soil erosion and dust and referenced the BLM Gold Book standards for building the lowest standard road possible.

Special Designations

One commenter suggested that the Project Area lacks wilderness characteristics and that the BLM not consider this issue in the EIS.

Special Status Species

Many commenters raised concern about potential impacts to special status species, especially greater sage-grouse. Some commenters noted that greater sage-grouse populations are in decline and that designated Governor's greater sage-grouse Core Population Areas (Sage-grouse Core Areas) overlap with a portion of the Project Area. Commenters emphasized compliance with WGFD recommendations in Sage-grouse Core Areas. Some commenters also emphasized providing adequate buffer size (suggestions ranged from 0.25 to 5 miles) between project facilities and greater sage-grouse leks and limiting well density to minimize impacts. Other comments associated with greater sage-grouse included:

- the importance of preserving greater sage-grouse habitat connectivity,
- incorporating the newest research and conservation strategies into the alternatives and impact analysis,
- thoroughly examining noise impacts to greater sage-grouse breeding behavior,
- seasonally avoiding activity in greater sage-grouse winter concentration areas, and
- waiting until the Wyoming greater sage-grouse Management RMP Amendment is completed to make a final decision regarding the NPL Project.

One commenter specifically noted the potential impacts of open dumpsters at development sites might lead to more ravens in the area potentially increasing predation on greater sage-grouse eggs. Commenters requested that the EIS address the NPL Project's relation to pending candidate conservation agreements, disclose whether the NPL Project will comply with BLM guidance regarding well density in Sage-grouse Core Areas, and identify population trends for greater sage-grouse.

One commenter provided recommendations for protective measures for other special status species including white-tailed prairie dog, mountain plover, pygmy rabbit, and rare plant species. These measures generally consisted of mapping population locations and determining population trends, as well as establishing buffers around known populations. A comment noted that the range of the northern leopard frog, petitioned for listing under the Endangered Species Act by the U.S. Fish and Wildlife Service, might extend into the Project Area. Other commenters requested that the EIS identify potential impacts to wolves, downstream flows that may affect special status fish species, and stopover points for avian species.

Stakeholder Involvement

Multiple commenters requested annual planning meetings, coordination committees, and other methods for continued stakeholder involvement during project implementation. They recommended state and federal agencies, local governments and conservation districts, the proponent, affected livestock operators and property owners, and other stakeholders attend these meetings to work together and address issues related to the NPL Project. One commenter recommended that Encana consider funding a community liaison to keep stakeholders engaged and invested and to provide education on the benefits and risks associated with energy development. Some commenters recommended stakeholder involvement from various state and federal agencies and interest groups including Wyoming Department of Environmental Quality and the Alliance for Historic Wyoming.

Surface Disturbance

Commenters supported limiting the NPL Project's surface disturbance through various measures. Recommendations included limiting the number of wells, co-locating pipelines with roads, siting pipelines above ground instead of burying, setting surface disturbance caps in the alternatives, and using special techniques to limit surface disturbance in crucial wildlife habitat. Commenters also noted elements of the proposed action that limit surface disturbance, including the use of existing instead of new facilities in certain cases, directional drilling, and multi-well pads. Other commenters emphasized the relatively small proportion of the project area that the NPL Project is anticipated to disturb.

Traffic and Transportation

Commenters requested that the EIS clearly define the NPL Project's associated road system, including all proposed new or improved roads and its effects on county roads. Comments regarding the project's effects on county roads raised issues related to usage, condition, dust abatement, maintenance, and traffic safety. One commenter requested that the EIS include a level of service study for affected county roads; another suggested using the most direct travel routes for the proposed project. A number of commenters requested that the EIS include a transportation plan; they asked for close coordination with local governments in this plan's development to address road maintenance, closure, construction, traffic, and mitigation measures for roads affected by project-related usage. Other transportation issues raised by commenters included:

- access route alternatives for the NPL Project,
- the effect of seasonal restrictions to traffic during tourism season,

- preference for no new net road increases (i.e., close old roads if new roads are to be constructed),
- avoiding off-road travel, and
- coordinating with the Wyoming Department of Transportation and counties for permitting, project access routes, and oversize loads.

Other commenters suggested that the EIS analyze an alternative which minimizes surface disturbance by building roads to the minimum standard for production operations and that the proponent bus workers to construction locations and establish speed limits on access roads.

Vegetation

Comments pertaining to vegetation (and not included in other issue categories) related primarily to wetlands. Commenters advocated avoiding all impacts to wetlands and fully restoring or mitigating any unavoidable impacts. Commenters suggested that the EIS include BMPs and other protective measures for wetlands, analyze methods for restricting actions on lands that may affect wetlands, and map and inventory all wetlands, seeps, and springs in the Project Area.

Visual

One commenter raised concerns over the NPL Project's contribution to impaired visibility in sensitive viewsheds (e.g., Class I Visibility Areas) including Wilderness Areas and the Wind River Range. Another commenter noted that the NPL Project should have no visual impacts to local communities.

Water Resources

Commenters recognized the importance of including a detailed analysis of all potential impacts to surface water and groundwater that may result from the NPL Project. A number of comments advocated a detailed analysis of all water sources, transport, and disposal throughout all phases of the NPL Project, including construction, exploration, and production.

Many comments expressed concern in regards to potential water quality impacts, including issues pertaining to produced water, chemical spills, hydraulic fracturing, and sedimentation. Commenters questioned how the NPL Project would handle produced water, with one commenter requesting a detailed discussion on how it would be exported and another supporting infield disposal methods. Commenters also noted the importance of preventing spills and leaks of produced water and establishing a protocol for detecting and reporting spills and leaks if they do occur. One commenter requested that the EIS identify all source water protection areas within each alternative. Commenters raised the issue of water contamination from chemical spills, with some comments stressing the importance of developing appropriate response plans and reporting measures. Commenters also raised concerns over the use of hydraulic fracturing requesting that the EIS disclose all chemicals used and an estimation of flow-back volumes.

Commenters emphasized the importance of water-quality monitoring. A number of comments related to baseline monitoring, advocating for a detailed characterization of the hydrology in the Project Area, including springs, aquifers, recharge zones, Waters of the U.S., and existing water wells that may be affected by the NPL Project. Comments supported the development of a water-quality monitoring plan that also addresses remediation. One commenter suggested establishing monitoring wells within and adjacent to the Project Area, while another supported using existing and new water wells for other beneficial uses in addition to monitoring, such as livestock watering. Comments called for the identification of dependent users of water resources that may be affected by the NPL Project and the formulation of mitigation measures including compensation.

A number of commenters identified erosion and sedimentation resulting from surface disturbance as a potential impact to water quality and stream channel morphology. Commenters requested that the EIS document all potential stream crossings and how potential impacts from stream crossings would be minimized. Comments advocated the use of erosion-control measures and locating project facilities away from floodplains, riparian areas, and ephemeral drainages to minimize adverse impacts on water quality.

Wild Horses

One commenter suggested allowances for wildlife-friendly fencing to allow movement of wild horses and recommended mitigation that is beneficial to wild horses.

Wildlife

A number of commenters emphasized that the EIS should utilize all appropriate information to fully analyze impacts to wildlife. Commenters suggested that the EIS incorporate the most recent scientific research and development in the Project Area vicinity to characterize big game winter range and migration corridors in the Project Area and develop appropriate mitigation. One commenter requested an updated inventory for all fish and wildlife resources, while others emphasized analyzing the impacts of development, production, maintenance and other related human activities to wildlife. Other comments related to the treatment of wildlife in the alternatives, suggesting that the EIS identify the Wyoming Game and Fish Commission's approved Recommendations for Development of Oil and Gas Resources within Important Wildlife Habitats, and recommending that the alternatives and analysis address a range of impacts, from minor to severe, on big game species.

Some commenters expressed their beliefs that the NPL Project will have little or no impact on wildlife while others anticipated some impact to wildlife and recommended a variety of measures to reduce impacts. Recommended measures to reduce impacts to wildlife included:

- limiting the density of wellpads and roads,
- locating wells away from habitat frequently used by wildlife,
- phasing project development,
- temporally or seasonally restricting construction and maintenance activities,
- limiting noise generation during breeding periods,
- controlling where produced water is released,
- limiting the impact of vehicle traffic by restricting speed and providing various forms of road crossings amenable to wildlife,
- wildlife population monitoring,
- using suitable produced water for wildlife use, and
- adaptive management strategies.

Commenters expressed concerns for the NPL Project's potential impacts to wildlife based on previous development in the region and sensitive wildlife habitat. Comments focused on the potential loss or fragmentation of habitat and migration routes for wildlife, especially big game species including elk, mule deer, and pronghorn. Commenters specifically raised the issues of big game winter range and declining mule deer numbers in the Project Area, with some commenters recommending excluding important winter ranges from surface disturbance. Another commenter recommended reviewing current big game winter range delineations. Commenters also noted the NPL Project's proximity to an

important pronghorn migration route, emphasizing the need to allow for continued migration of this species in the area and plan for alternative migration routes.

Commenters expressed concern over loss of habitat for native fish from hazardous spills or sedimentation and stream channel alteration, nest sites for raptors and sagebrush obligate bird species, and reptile (e.g., snake hibernacula) and amphibian breeding habitat. One commenter noted the potentially long time period before reclaimed lands can return to habitat used by wildlife, while another was concerned that wildlife displaced from the Project Area might affect surrounding areas. Commenters also highlighted the potential impacts to birds from shallow pits during drilling operations.

3.4.4 Summary of Out of Scope Comments

In addition to the comments described above, the BLM received scoping comments that were outside the scope of analysis for the NPL Project EIS. Out of scope comments include general opinions of the project (e.g., I support/I oppose), comments on projects or areas outside the geographic range of analysis in the EIS, comments associated with decisions and actions that will not be made in the NPL Project EIS, and other comments that are not within the scope of analysis for the NPL Project EIS.

Numerous comments expressed general support and opposition for the NPL Project. Multiple commenters requested approval of the NPL Project and noted Encana's commitment to responsible development of hydrocarbon resources and the importance of domestic energy production and national energy independence. Other commenters expressed general opposition to the NPL Project noting concern about continued oil and gas development in the region and beliefs that oil and gas development is being prioritized over the management of other resources. Commenters expressed both positive and negative perceptions of oil and gas development in the Jonah field.

One commenter requested designation/management of wildlife refuges and state parks at various locations throughout Wyoming and noted that legislation should be passed that puts a cap on oil and gas wells and mining. Another commenter requested a sensible alternative to the Environmental Protection Agency. One commenter suggested that Encana could assist with the rural refuse burning issue by helping rural and other outlying communities areas dispose of solid waste. Another commenter recommended various methods to secure and establish appropriate funding for the management of fish and wildlife resources in Wyoming. A commenter requested implementing changes in technology for improved measurement of produced minerals and wastes to improve metering and verify reporting and also called for streamlining and increasing the transparency of reporting and establishing clear protocols for reporting (e.g., well production, spill reporting).

Other out of scope comments included summaries of the various missions of businesses and interest groups and requests to receive copies and notification of the EIS and to be added to the NPL Project mailing list.

4.0 ISSUES IDENTIFIED DURING SCOPING

Based on the comments submitted during scoping and summarized above (Section 3.4.3) the BLM developed 29 issue statements, in the form of questions, which describe the general issues and concerns identified during scoping. This section also includes specific questions and concerns encapsulated within each issue statement. The BLM will continue to consider issues during the EIS process as it receives additional input from the public, cooperating agencies, tribes, and other affected parties.

Air Quality

Issue 1: How would the NPL Project affect air quality?

- Existing air-quality conditions, trends, and issues in the area should be adequately characterized.
- Will the NPL Project contribute to exceedence of National Ambient Air Quality Standards?
- How will the NPL Project affect local and regional ozone?
- Will the NPL Project contribute to visibility impacts in Class I areas?
- Will the NPL Project result in increased deposition of contaminants in National Parks or other sensitive locations?
- Incorporate robust and quantitative modeling for all appropriate air pollutants resulting from NPL Project drilling, production, vehicle use, and other sources.
- How will the NPL Project minimize or mitigate air quality impacts?

Climate Change

Issue 2: While considering current, applicable agency policy, how would climate change affect the proposed NPL Project and how would the NPL Project affect climate change?

- Include quantitative estimates of greenhouse gas emissions.
- How will the NPL Project impact or be affected by climate change?
- How will potential greenhouse gas emissions be minimized or mitigated?

Cultural Resources

Issue 3: How would the proposed NPL Project affect cultural and tribal resources?

- Consider the NHPA, Native American Graves Protection and Repatriation Act, and other relevant cultural resource related policy and guidance in the NPL Project and process.
- How will the BLM identify and monitor cultural resources in the NPL Project area?
- How will the BLM avoid or mitigate adverse impacts to the integrity of cultural and historic sites, including National Historic Trails and their cutoffs?
- How will the BLM incorporate consultation with tribes to identify and protect Traditional Cultural Properties?

Cumulative Impacts

Issue 4: What are the cumulative impacts associated with current and future development in the region?

- What past, present, and reasonably foreseeable projects and their connected actions would be appropriate to include in the cumulative impacts analysis?
- Consider a landscape level scale when determining the region of impact for cumulative impacts.
- What would the cumulative impacts be on air quality, biological resources, soils, traffic and transportation, recreation, socioeconomic, and other resources and resource uses?

Health and Safety

Issue 5: How would the NPL Project affect human health in the region?

- If the NPL Project results in declines in air quality, how would it contribute to human health impacts?
- How will the EIS analyze the effects of ground level ozone to human health?
- What are the potential health and safety impacts from NPL Project traffic?

Invasive Species

Issue 6: How would the NPL Project affect the establishment and spread of invasive species?

- What methods and practices would the NPL Project employ to control the establishment and spread of invasive species?

Land Use

Issue 7: How will the EIS identify and address land use?

- Clearly identify land ownership on areas affected by the NPL Project and any land use changes.
- The NPL Project needs to be consistent with federal, state, and local land use plans.

Livestock Grazing

Issue 8: How will the NPL Project affect livestock grazing in the area?

- How will the NPL Project affect grazing lessees and their allotments?
- Consider the Wyoming Standards for Healthy Rangelands.
- Include appropriate mitigation to reduce impacts to livestock and grazing.

Mitigation

Issue 9: How will potential adverse impacts to resources and resource uses be reduced or eliminated?

- Include appropriate onsite and offsite mitigation measures.
- Consider a mitigation fund.
- Is mitigation banking appropriate for the NPL Project?

- Adequately describe the rationale and implementation of mitigation measures for all phases of the NPL Project in the EIS.

NEPA Process

Issue 10: What are the necessary steps to ensure an adequate and defensible NEPA process and EIS?

- Include an appropriate and reasonable range of alternatives in the EIS that are feasible and responsive to the purpose and need.
- Base the alternatives, information, and analysis in the EIS on science.
- Establish adequate baseline data needs for the NPL Project and affected area.
- Consider presenting information and conducting analysis at the landscape scale.
- Include appropriate public and stakeholder participation during the NEPA process.

Issue 11: How will the NPL Project EIS consider and incorporate other appropriate NEPA documents?

- Consider management identified in the Pinedale and Rock Springs Resource Management Plans in the EIS.
- Coordinate the NPL Project EIS with the ongoing Wyoming Greater Sage-grouse RMP Amendments.

Oil and Gas Operations

Issue 12: What equipment, techniques, and design features will be implemented on the NPL Project to respond to local and regional conditions?

- Design the NPL Project facilities, infrastructure, and activities to reduce the potential for adverse impacts including considering the use of emission reduction technology, siting of pipelines and other infrastructure, directional drilling, the use of natural gas-powered drill rigs, and covering and lining shallow reserve pits.
- Consider technologies and options that balance extraction of hydrocarbon resources with environmental considerations.
- Consider options for phased development for the NPL Project.
- The proponent and any contracted workers should adhere to all applicable policies, regulations, and BMPs.

Policies, Regulations, and Permitting

Issue 13: How will the NPL Project and approval process consider applicable policies, regulations, and permitting?

- The NPL Project needs to be consistent with federal, state, and local policies, regulations, executive orders, and other applicable legislation and guidance.
- Coordinate acquisition of appropriate permits with federal, state, and local governments.
- Recognize the State of Wyoming as having the authority to regulate air quality.

Issue 14: Under what circumstances will the BLM grant exceptions, waivers, or modifications to oil and gas lease stipulations on leases within the NPL Project Area?

- Follow the exception/waiver/modification criteria developed in the Pinedale Field Office RMP and the Green River RMP.

Reclamation

Issue 15: How will the NPL Project and NEPA Process support appropriate and successful reclamation?

- Reclamation should support the reestablishment of native vegetation.
- Consider interim reclamation measures such as mulching, irrigation, fencing, and reseeding with native and nonnative mixes to establish suitable conditions for the establishment of native vegetation.
- Coordinate reclamation with appropriate stakeholders and ongoing reclamation efforts.
- Reclamation plans should account for site-specific conditions, comply with Wyoming reclamation policy, and include a monitoring component.

Recreation

Issue 16: How will the NPL Project affect outdoor recreation?

- Adequately describe current recreation use in the NPL Project vicinity in the EIS.
- How would impacts on fish, wildlife, and other resources affect recreational hunting and fishing?
- How will the BLM consult with appropriate stakeholders to minimize impacts to outdoor recreation?
- Identify and implement methods to limit impacts to big game hunting and other forms of recreation.

Social and Economic

Issue 17: How will the NPL Project affect economic conditions on local, regional and national levels?

- How will the NPL Project affect local, regional and national economies in the immediate future and over the full term of development and operation?
- Include in the analysis the impact of revenues from royalties and taxes to the federal, state, and local governments.
- Minimize the potential for adverse socioeconomic impacts to local communities.
- How will the NPL Project affect other industries in the area such as tourism, hunting, and fishing?

Issue 18: How will the NPL Project affect social conditions and quality of life?

- How will the NPL Project affect public services demand and local governments' ability to provide them?
- How will the NPL Project affect health care, traffic, public infrastructure, and other quality of life issues?

Soils

Issue 19: How will the NPL Project affect soils?

- How will topsoil removal and surface disturbance affect soil?

- Consider techniques such as limiting soil removal, mowing rather than blading vegetation, and the use of topsoil live haul to limit impacts to soils.
- Based on a site soil analysis, weather, slope, and other relevant information, consider immediate site stabilization after disturbance.
- Incorporate guidance from the BLM Gold Book and other appropriate techniques to limit soil disturbance from roads (e.g., paving roads when they serve more than five well sites).

Special Status Species

Issue 20: Will the NPL Project affect special status species and their habitat?

- Potential special status species of concern include greater sage-grouse, white-tailed prairie dog, mountain plover, pygmy rabbit, and rare plant species.
- Characterize special status species habitat and populations within the Project Area and include appropriate avoidance and minimization measures (e.g., disturbance buffers).
- Comply with existing regulations and policy associated with special status species.
- Incorporate contemporary research and conservation strategies for the greater sage-grouse to inform the project design, alternatives, and impacts analysis.
- Minimize impacts to greater sage-grouse and its habitat.
- How will the EIS analyze potential effects to special status species outside the Project Area (e.g., downstream fish populations)?

Stakeholder Involvement

Issue 21: How will the NEPA process and the proponent facilitate stakeholder involvement?

- What ongoing methods or strategies will the BLM and the proponent employ to achieve active stakeholder involvement to resolve issues related to the NPL Project?
- How will the NEPA process involve local, state, and federal agencies and interest groups?

Surface Disturbance

Issue 22: To what extent should the BLM limit surface disturbance within the Project Area?

- Consider limiting surface disturbance through feasible design features, BMPs, and mitigation (e.g., co-locating pipelines and roads, siting pipelines above ground).
- Will any limitations in surface disturbance attributable to the NPL Project be prospectively applied to other use-authorizations?
- What will be the positive and negative impacts of any surface-disturbance limitations on the NPL Project?

Traffic and Transportation

Issue 23: How will the NPL Project affect traffic and transportation and local roads?

- How will the NPL Project affect county roads in terms of usage, condition, dust abatement, maintenance, and traffic safety?
- Include a transportation plan developed in coordination with local and state governments in the EIS.

- How will the NPL Project minimize adverse effects to traffic and the local transportation network?

Vegetation

Issue 24: How will the NPL Project minimize or mitigate any adverse effects to wetlands?

- Characterize all wetland resources in the Project Area.
- Include BMPs and other protective measures for wetlands.

Visual

Issue 25: How will the NPL Project affect viewsheds and visibility?

Water

Issue 26: How will the NPL Project affect surface water and groundwater resources?

- Fully characterize the hydrology including springs, aquifers, recharge zones, Waters of the U.S., and existing water wells that may be affected by the NPL Project.
- Provide an appropriate analysis of impacts to all water resources in the EIS. The analysis should consider direct impacts and impacts from transportation and disposal of water throughout all phases of the NPL Project.
- Identify all source-water protection areas under each alternative.
- How will Encana and the BLM minimize water quality impacts, including those resulting from erosion and sedimentation?
- Incorporate methods to monitor groundwater and surface water quantity and quality during all phases of the NPL Project.
- What are the potential impacts to surface and groundwater from hydraulic fracturing?
- What impacts would stream crossings have on water quality and how would impacts be minimized?
- Where feasible, locate NPL Project facilities to avoid floodplains, riparian areas, ephemeral drainages and other surface water features.

Issue 27: How will the proponent collect, store, treat, or dispose of produced water?

- What methods will the proponent use to detect and report spills or leaks of produced water?
- Are there any beneficial uses of produced water that may be considered for the NPL Project?

Wild Horses

Issue 28: How will the NPL Project minimize impacts on wild horses?

- Consider wild horse friendly fencing and other mitigation and design features that benefit wild horses.

Wildlife

Issue 29: How will the NPL Project affect wildlife and habitat?

- Consider big game migration routes (e.g., pronghorn, elk, and mule deer) through the Project Area and limit impacts to these corridors.
- Analyze impacts to big game winter ranges and consider methods to limit impacts to these areas.
- Analyze the NPL Project's effects on habitat fragmentation and connectivity and the possible displacement of wildlife at the landscape scale.
- Incorporate the most recent and applicable scientific studies to analyze potential impacts to wildlife.
- Include mitigation, design features, and BMPs to avoid or limit adverse impacts to wildlife.
- How will wildlife displaced from the Project Area affect surrounding areas?
- How will avian species be impacted from shallow pits during drilling operations?

5.0 SUMMARY OF FUTURE STEPS IN THE PROCESS

The BLM will consider the comments submitted during scoping and the issues identified in this scoping report when developing alternatives to the proposed action. The BLM will continue to consider issues identified during scoping, along with other issues and potential impacts, during preparation of the EIS. The BLM will analyze and document potential impacts that could result from implementing the proposed action and the alternatives in a Draft EIS.

The Draft EIS is currently scheduled for publication in spring 2012. A Notice of Availability (NOA) for the Draft EIS will be published in the *Federal Register* announcing availability of the Draft EIS for review and comment. Publication of the NOA for the Draft EIS will initiate a 45-day public comment period during which the BLM will invite the public and other interested parties to provide comments on the Draft EIS. The BLM will hold public meetings during the public comment period and will advertise meetings through mailings to contacts on the project mailing list and through other notification methods. The BLM will review and consider all comments received on the Draft EIS during the public comment period. The BLM will revise the Draft EIS as appropriate based on public comments and all substantive comments and responses will be incorporated into the Final EIS. An NOA for the Final EIS will be published in the *Federal Register* announcing the availability of the Final EIS. The Final EIS is scheduled to be released in early 2013.

The BLM will prepare a ROD to document the selected alternative and identify any accompanying mitigation measures. The BLM will issue the ROD no sooner than 30 days after the NOA for the Final EIS is published in the *Federal Register*. The ROD is scheduled to be released in spring 2013.

NPL Natural Gas Development Project

Scoping Report

Appendix A

Notification and Advertisements

APPENDIX A

NOTIFICATION AND ADVERTISEMENTS

TABLE OF CONTENTS

Notice of Intent

from 9 a.m. to 4 p.m., Monday through Friday, in the public room at the BLM Montana State Office, 5001 Southgate Drive, Billings, Montana.

A written notice to participate in the exploration licenses should be sent to the State Director, BLM Montana State Office, 5001 Southgate Drive, Billings, Montana 59101–4669 and Spring Creek Coal Company, P.O. Box 67, Decker, Montana 59025–0067.

FOR FURTHER INFORMATION CONTACT: Robert Giovanini by telephone at 406–896–5084 or by e-mail at *rgiovani@blm.gov;* or Connie Schaff by telephone at 406–896–5060 or by e-mail at *cschaff@blm.gov.*

SUPPLEMENTARY INFORMATION: The exploration activities will be performed pursuant to the Mineral Leasing Act of 1920, as amended, 30 U.S.C. 201(b), and to the regulations at 43 CFR part 3410. The purpose of the exploration program is to gain additional geologic knowledge of the coal underlying the exploration area for the purpose of assessing the coal resources. The exploration program is fully described and will be conducted pursuant to an exploration license and plan approved by the BLM. The exploration plan may be modified to accommodate the legitimate exploration needs of persons seeking to participate.

The lands to be explored for coal deposits in exploration license MTM 101687 are described as follows:

Principal Meridian, Montana

T. 8 S., R. 38 E.,
Sec. 24, E½SE¼;
Sec. 25, E½NE¼ and NE¼SE¼.
T. 8 S., R. 39 E.,
Sec. 4, S½;
Sec. 5, lots 13 thru 26, inclusive, E½SW¼, and SE¼;
Sec. 8, lots 1 thru 4, inclusive, E½, and E½W½;
Sec. 9;
Sec. 13, SW¼NE¼, NE¼NW¼, N½NW¼NW¼, SE¼NW¼NW¼, N½SE¼NW¼, SE¼SE¼NW¼, NE¼SE¼, NE¼NW¼SE¼, and SE¼SE¼;
Sec. 17, lots 1 thru 4, inclusive, E½, and E½W½;
Sec. 20, lots 1 thru 4, inclusive, E½, and E½W½;
Sec. 21, NW¼NW¼, S½N½, and S½;
Sec. 22, SW¼NW¼NE¼, SW¼NE¼, NW¼SE¼NE¼, S½SE¼NE¼, NW¼NE¼NW¼, S½NE¼NW¼, S½NW¼, N½NE¼SW¼, N½SE¼NE¼SW¼, N½NW¼SW¼, SW¼NW¼SW¼, and SW¼SW¼;
Sec. 27, W½NW¼ and W½SE¼NW¼;
Sec. 28, N½NE¼, NW¼, and NW¼SW¼;
Sec. 29, N½NE¼ and NE¼NW¼.
Containing 5,260.16 acres.

The Federal coal within the lands described for exploration license MTM 101667 is currently unleased for development of Federal coal reserves.

The lands to be explored for coal deposits in exploration license MTM 101688 are described as follows:

Principal Meridian, Montana

T. 8 S., R. 39 E.,
Sec. 26, SW¼SW¼ and S½SE¼SW¼;
Sec. 27, NE¼SW¼, SE¼NE¼SW¼, NW¼NW¼SE¼, S½NW¼SE¼, and S½SE¼;
Sec. 35, E½, E½W½, and NW¼NW¼.
T. 9 S., R. 39 E.,
Sec. 1, lots 1 thru 4, inclusive, W½E½, and W½;
Sec. 2, E½ and E½W½;
Sec. 11, NE¼, E½NW¼, NE¼SW¼, and N½SE¼;
Sec. 12, lots 1 thru 4, inclusive, W½E½, NW¼, N½SW¼, and SE¼SW¼.
T. 9 S., R. 40 E.,
Sec. 6, lots 5–7, inclusive, S½SE¼NW¼, E½SW¼, S½NE¼SE¼, NW¼NW¼SE¼, S½NW¼SE¼, and S½SE¼;
Sec. 7, lots 1–4, inclusive, NE¼, E½W½, N½SE¼, and SW¼SE¼.
Containing 3,751.45 acres.

The Federal coal within the lands described for exploration license MTM 101668 is currently unleased for development of Federal coal reserves.

The Spring Creek Coal Company has requested that the BLM's decision associated with exploration license MTM 101688 be deferred for approximately 9 months after the decision on exploration license MTM 101687.

Phillip C. Perlewitz,
Chief, Branch of Solid Minerals.

[FR Doc. 2011–8685 Filed 4–11–11; 8:45 am]

BILLING CODE 4310–DN–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLWYD010000–L13110000–EJ0000]

Notice of Intent To Prepare an Environmental Impact Statement for the Proposed Normally Pressured Lance Natural Gas Development Project, Sublette County, WY

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, and the Federal Land Policy and Management Act (FLPMA) of 1976, as amended, the Bureau of Land Management (BLM) Pinedale Field Office (PFO), Pinedale, Wyoming, and the BLM Rock Springs Field Office (RSFO), Rock Springs, Wyoming, intend to prepare an Environmental Impact Statement (EIS) for the Normally Pressured Lance (NPL) Natural Gas Development Project and by this notice are announcing the beginning of the scoping process to solicit public comments and identify issues.

DATES: This notice initiates the public scoping process for the EIS. Comments on issues may be submitted in writing until May 12, 2011. The dates and locations of any scoping meetings will be announced at least 15 days in advance through local news media outlets and through the BLM Web site at: *http://www.blm.gov/wy/st/en/info/NEPA/pfodocs/npl.html.* In order to be included in the Draft EIS, all comments must be received prior to the close of the scoping period or 15 days after the last public meeting, whichever is later. Additional opportunities for public participation will be provided on publication of the Draft EIS.

ADDRESSES: You may submit comments related to the NPL Natural Gas Development Project by any of the following methods:

- *E-mail: NPL_EIS_WY@blm.gov;*
- *Mail:* P.O. Box 768, Pinedale, WY 82941; or
- *Hand delivery:* 1625 W. Pine Street, Pinedale, Wyoming.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

FOR FURTHER INFORMATION CONTACT: Kellie Roadifer, Planning and Environmental Coordinator, Pinedale Field Office, 1625 W. Pine Street, P.O. Box 768, Pinedale, Wyoming 82941; 307–367–5309; *Kellie_Roadifer@blm.gov.* Documents pertinent to this proposal may be examined at the Pinedale Field Office and will be posted online at *http://www.blm.gov/wy/st/en/info/NEPA/pfodocs/npl.html.*

SUPPLEMENTARY INFORMATION: The NPL encompasses an area of 141,080 acres located immediately south and west of the existing Jonah Infill Natural Gas Field. It is located within the BLM PFO and RSFO, High Desert District, in Sublette County, Wyoming. EnCana Oil & Gas (USA) Inc. (EnCana) currently owns leasehold interests on more than 70 percent of this area and proposes to develop up to 3,500 wells ranging from a depth of 6,500 to 13,500 feet and

based on a maximum of 64 wells per 640-acre section of land. These wells are projected to be drilled over a 10-year period to produce gas from the NPL pool. To minimize surface disturbance, wells would be directionally drilled from up to four 18-acre multi-well pad locations per 640-acre section of land. Approximately 10 natural gas drilling rigs would be used. Only drilling muds and cement mixed with fresh water would be used to drill and case through surface water aquifers. About 25,000 barrels of recycled water would be used to drill the majority of each well. Well completion operations would be conducted using EnCana's flare-less flow-back technology to eliminate or reduce emissions and flow-back water would be recycled for a "net-zero" water balance.

In order to minimize air emissions and surface disturbance, a three-phase pipeline gathering system would transport gas, condensate and produced-water to a minimal number of central collection facilities. Pipelines for the gathering system would parallel roads whenever possible and be buried deep enough to avoid freezing conditions. Electric compression would be used to minimize air impacts. Access roads and production infrastructure would be co-located wherever possible. Only a minimum number of access roads and equipment areas needed for on-going production, operation and maintenance activities would be maintained. Remote telemetry technology would reduce truck traffic associated with well servicing. Well pad locations would be constructed so that disturbed areas and haul road distances would be minimized. Topsoil would be conserved for subsequent reclamation. Reclamation efforts would commence as soon as each well pad location is completed and production equipment is operational in accordance with Onshore Order Number 1. Initial surface disturbance is estimated to be 5,429 acres or 3.85 percent of the total NPL area. After reclamation, an estimated 1,411 acres or 1.0 percent of the NPL area would remain in use for production purposes for the life of the gas field.

The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, including alternatives, and guide the process for developing the EIS. At present, the BLM has identified the following potential issues:

- Increased traffic and associated impacts on existing county, state, and BLM roads;
- Socioeconomic impacts to local communities;
- Impacts to surface water and groundwater resources, including floodplains;
- Air quality impacts from emissions resulting from drilling and production activities;
- Impacts related to reclamation of disturbed areas and control of invasive plants;
- Conflicts with livestock management operations in the Project Area;
- Impacts to cultural, historical, and paleontological resources within the Project Area;
- Impacts to wildlife habitats and populations within the Project Area, including big game, raptors, and sage-grouse;
- Impacts to threatened, endangered, or candidate plant and animal species, including potential Green River water depletions and effects on downstream listed fish species;
- Impacts to lands with wilderness characteristics;
- Cumulative effects of drilling and development activities when combined with other ongoing and proposed developments; and
- Conflicts between mineral development activities and recreational opportunities.

The BLM will utilize and coordinate the NEPA public comment process to comply with section 106 of the National Historic Preservation Act (16 U.S.C. 470f) as provided for in 36 CFR 800.2(d)(3). Native American tribal consultations will be conducted in accordance with BLM policy and sites of religious or cultural significance or other tribal concerns will be given due consideration. An updated inventory of lands with wilderness characteristics will be utilized to comply with Secretarial Order 3310. Federal, State, and local agencies, along with other stakeholders interested in or affected by the BLM's decision on this project are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate as a cooperating agency.

Authority: 40 CFR 1501.7

Donald A. Simpson,

State Director.

[FR Doc. 2011–8687 Filed 4–11–11; 8:45 am]

BILLING CODE 4310–22–P

DEPARTMENT OF JUSTICE

Notice of Lodging of Consent Decree Under the Comprehensive Environmental Response, Compensation and Liability Act

Notice is hereby given that on March 31, 2011, a proposed Amendment to Consent Decree was lodged with the United States District Court for the Northern District of Illinois in *United States* v. *City of Waukegan, et al.*, Civil Action No. 04C 5172.

Under a consent decree previously entered by the district court in this action under Sections 106 and 107 of the Comprehensive Environmental Response, Compensation and Liability Act, as amended ("CERCLA"), 42 U.S.C. 9606 and 9607, the former General Motors Corporation, now known as Motors Liquidation Company ("GM"), was one of two Performing Settling Defendants responsible for implementing a remedial action to address releases and threatened releases of hazardous substances at and from the Waukegan Manufactured Gas and Coke Plant Site (the "Site") in Waukegan, Illinois. Pursuant to financial assurance requirements of the consent decree, GM obtained a performance bond from Westchester Fire Insurance Company ("Westchester"). After filing for bankruptcy in 2009, GM stopped participating in implementation of the remedial action at the Site.

Under the proposed Amendment to Consent Decree, Westchester will become a party to the consent decree and become responsible for financing implementation of the remedial action at the Site, up to a $10.5 million limit that corresponds to the outstanding amount of the original performance bond issued by Westchester. Westchester's obligations will include: (1) Reimbursing 50 percent of the response costs incurred by North Shore Gas Company (the other Performing Settling Defendant) between June 1, 2009, when GM stopped participating in implementation of the consent decree, and the effective date of the Amendment to Consent Decree; (2) monthly reimbursement of 50 percent of the ongoing remedial costs incurred by North Shore Gas Company after the effective date of the Amendment to Consent Decree; (3) acceleration of remaining payments (up to the $10.5 million limit on total Westchester payments) in accordance with instructions to be provided by EPA, in the event that EPA takes over implementation of any Work, pursuant to provisions of the previously entered consent decree. In addition, to guarantee

Scoping Meeting Postcard

Public Scoping Meetings

The Bureau of Land Management (BLM) is in the process of preparing an Environmental Impact Statement (EIS) to evaluate the impacts of a proposed natural gas development project and is seeking public input on issues and alternatives that should be addressed in the EIS. Scoping meetings provide an opportunity for the public to learn about and comment on the project.

Proposed Project: Encana Oil & Gas (USA) Inc. proposes to drill natural gas wells within approximately 140,000 acres of BLM-administered land on an average of four multi-well pads per 640-acre section of land (approximately 3,500 wells). The proposed Normally Pressured Lance (NPL) project area is adjacent to the Jonah Field, approximately 35 miles south of Pinedale, Wyoming. The wells, along with associated infrastructure, would be constructed over a 10-year period at a rate of up to 350 wells per year with an average life of 40 years per well.

Normally Pressured Lance Project Area

You are invited to attend the scoping meetings at the following locations:

PINEDALE, WYOMING

Monday May 2nd, 2011 5:30 p.m. – 7:30 p.m.	BLM Pinedale Field Office Conference Room 1625 W. Pine St. Pinedale, Wyoming 82941

MARBLETON, WYOMING

Tuesday May 3rd, 2011 5:30 p.m. – 7:30 p.m.	Big Piney Senior Center First Floor 111 Rakestraw Avenue Marbleton, WY 83113

ROCK SPRINGS, WYOMING

Wednesday May 4th, 2011 5:30 p.m. – 7:30 p.m.	BLM High Desert District Office Conference Room 280 Highway 191 North Rock Springs, WY 82901

For more information contact:

Address: Kellie Roadifer, Project Manager
NPL Natural Gas Development Project
BLM Pinedale Field Office
1625 West Pine Street
P.O. Box 768
Pinedale, WY 82941

Email: NPL_EIS_WY@blm.gov

Website:
http://www.blm.gov/wy/st/en/info/NEPA/documents/pfo/npl.html

NPL Natural Gas Development Project EIS
BLM Pinedale Field Office
Kellie Roadifer
1625 West Pine Street
P.O. Box 768
Pinedale, WY 82941

NPL Scoping Flyer

Normally Pressured Lance Natural Gas Development Project

Public Scoping Meetings

The Bureau of Land Management (BLM) is in the process of preparing an Environmental Impact Statement (EIS) to evaluate the impacts of a proposed natural gas development project and is seeking public input on issues and alternatives that should be addressed in the EIS. Scoping meetings provide an opportunity for the public to learn about and comment on the project.

The proposed project encompasses BLM-administered, state, and private lands adjacent to the Jonah Field approximately 35 miles south of Pinedale in Sublette County, Wyoming.

- Natural gas development project
- Multiple wells on an average of four multi-well pads per 640-acre section (approximately 3,500 wells)
- Project area includes approximately 140,000 acres of BLM-administered land
- Constructed over a 10-year period with an average of 350 wells per year
- Average life of 40 years per well
- Includes construction of pipelines, roads, compressor stations, and other associated infrastructure

You are invited to attend the scoping meetings at the following locations:

PINEDALE, WYOMING	
Monday, May 2nd, 2011 **5:30 p.m. – 7:30 p.m.**	**BLM Pinedale Field Office, Conference Room** **1625 W. Pine St., Pinedale, WY 82941**
MARBLETON, WYOMING	
Tuesday, May 3rd, 2011 **5:30 p.m. – 7:30 p.m.**	**Big Piney Senior Center, First Floor** **111 Rakestraw Avenue, Marbleton, WY 83113**
ROCK SPRINGS, WYOMING	
Wednesday, May 4th, 2011 **5:30 p.m. – 7:30 p.m.**	**BLM High Desert District Office, Conference Room** **280 Highway 191 North, Rock Springs, WY 82901**

Each meeting will have an open house format

The BLM will consider comments submitted during public scoping during preparation of the Draft EIS.

Normally Pressured Lance Project Area

For more information, or to submit comments, please contact Kellie Roadifer:

Email: NPL_EIS_WY@blm.gov Phone: (307) 367-5309
or visit the project website: http://www.blm.gov/wy/st/en/info/NEPA/documents/pfo/npl.html

NPL Natural Gas Development Project Website

NPL Natural Gas Development Project News Release

U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT NEWS RELEASE
Pinedale Field Office

Release Date: 04/12/11
Contacts: Shelley Gregory
307-315-0612

BLM Pinedale Field Office Seeks Public Input on Proposed NPL Project

The Bureau of Land Management (BLM) Pinedale Field Office (PFO), in conjunction with the Rock Springs Field Office (RSFO), is seeking public comment on Encana's proposal to drill approximately 3,500 natural gas wells within the 141,080 acre Normally Pressured Lance (NPL) natural gas field in Sublette County over a 10-year period.

The Notice of Intent for the NPL project was published in the Federal Register on April 12 and initiates a 30-day public scoping period. The PFO and RSFO will host three public scoping meetings beginning at 5:30 p.m. on the following dates and locations: Monday, May 2 at the BLM PFO, 1625 W. Pine St., Pinedale, Wyo.; Tuesday, May 3 at the Big Piney Senior Center, 111 Rakestraw Ave., Marbleton, Wyo.; and Wednesday, May 4 at the BLM RSFO, 280 Hwy. 191 N., Rock Springs, Wyo.

An environmental impact statement (EIS) will be prepared for the proposed project located approximately 35 miles south of Pinedale, Wyo. and immediately south and west of the existing Jonah Infill Natural Gas Project.

The proposal and associated documents can be reviewed at the PFO, 1625 W. Pine St., Pinedale, Wyo., or at the RSFO, 280 Hwy. 191, Rock Springs, Wyo., or online at http://www.blm.gov/wy/st/en/info/NEPA/documents/pfo/npl.html.

Public comments are an important component of the National Environmental Policy Act process and help to identify issues, concerns, and mitigation opportunities. Comments should be constructive and relate directly to this proposal and impending EIS. Please be as specific as possible and cite any data or other information that you believe would assist the BLM in developing the most realistic range of alternative actions and the best-informed environmental impact analysis.

Comments will be accepted until close-of-business on May 12, 2011. Mail or deliver written comments to: Kellie Roadifer, Pinedale Field Office, 1625 W. Pine St., P.O. Box 768, Pinedale, WY 82941. Comments can also be emailed to NPL_EIS_WY@blm.gov.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

For further information, please contact Kellie Roadifer at 307-367-5309 or kroadife@blm.gov.

The BLM manages more land - over 245 million acres - than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The Bureau, with a budget of about $1 billion, also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.
--BLM--

Last updated: 04-14-2011

Pinedale Field Office 1625 West Pine Street Pinedale, WY 82941

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NPL Natural Gas Development Project

Scoping Report

Appendix B

Cooperating Agency Invitation Letters

APPENDIX B

COOPERATING AGENCY INVITATION LETTERS

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Cooperating Agency Invitation Letters

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
High Desert District
Pinedale Field Office
1625 West Pine, PO Box 768
Pinedale, WY 82941

TAKE PRIDE IN AMERICA

IN REPLY REFER TO
1790 (WYD010)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

May 31, 2011

Jeff Lewis
Natural Resources Conservation Service
79 Winston Dr., Suite 110
Rock Springs, WY 82901

Dear Mr. Jeff Lewis:

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Department of the Interior, Bureau of Land Management (BLM), is preparing an EIS to address potential effects of a project proposed by Encana Oil & Gas (USA) Inc. (Encana). The proposed natural gas development project is located within what is referred to as the Normally Pressured Lance (NPL) project area, adjacent to the Jonah Field, approximately 35 miles south of Pinedale, Wyoming. The project area comprises approximately 141,000 acres of lands administered by the BLM as well as state and private lands. It is generally located within Townships 27 through 29 North, Ranges 107 through 110 West, and 6th Principal Meridian in Sublette County, Wyoming (see enclosed map).

Preparation of this EIS will require the best efforts of the BLM and its collaborative partners who have special expertise or jurisdiction by law with respect to this proposal. Therefore, pursuant to 40 CFR 1501.6, this letter is to invite your participation as a cooperating agency for the Normally Pressured Lance Natural Gas Development Project EIS. Preparation of the EIS and associated Record of Decision (ROD) will enable the BLM to make future decisions that approve, modify, or deny anticipated Applications for Permit to Drill from Encana and associated rights-of-way in the project area.

Encana proposes to drill natural gas wells within the project area on an average of four multi-well pads per 640-acre section of land (approximately 3,500 wells). Each multi-well pad is proposed to average 18 acres per location. The wells, along with associated infrastructure, would be constructed over a 10-year period at a rate of up to 350 wells per year based on an average of 10 drill rigs working at any one time, or until the resource base is fully developed. Encana predicts an average life of 40 years per well. The extent of development will in part depend on the content of the EIS, ROD, and future permit decisions, including any environmental restrictions or limitations imposed by the BLM for operations proposed on BLM-administered lands.

The associated facilities proposed in the NPL project include roads, gas pipelines, powerlines, and separation, dehydration, metering, and fluid storage facilities to the extent such facilities are not already constructed. Hydrocarbons and associated liquids are proposed to generally be transported via subsurface pipeline to consolidated or individual compression, processing, and treatment facilities. Produced water would be transported by truck or pipeline to produced water disposal wells, discharged on the surface under appropriate permits, or transported to onsite evaporation ponds. NPL project development could result in the use of roads previously constructed and currently used in the project area as well as the construction of new roads. New roads are expected to consist primarily of access roads, using existing arterial roads for main access to the project area.

As a cooperating agency your participation may encompass those activities contained in 40 CFR 1501.6(b) including (at your expense) participation in the scoping process and providing information and staff support for development of the EIS based on your special expertise and jurisdictional authority. If you choose to participate as a cooperating agency, a Memorandum of Understanding with the BLM will be developed that identifies the respective responsibilities of the BLM and the cooperating agency in preparing the EIS.

Please respond to me, in writing or by email, indicating your interest to participate as a cooperating agency. I would appreciate your response by April 8, 2011. If you accept this offer to participate as a cooperating agency please also provide contact information for your coordinating liaison.

If you have any questions please contact Kellie Roadifer, BLM Project Manager, at 307-367-5309 or Kellie_Roadifer@blm.gov

Sincerely,

Shane DeForest
Field Manager

Enclosure: Normally Pressured Lance Natural Gas Development Project Location Map

Identical letters sent to:

- Bureau of Reclamation Upper Colorado Region
- US Environmental Protection Agency, Region 8
- National Park Service - Intermountain Regional Office
- Natural Resources Conservation Service
- US Army Corps of Engineers
- US Department of Energy
- US Fish and Wildlife Service - Wyoming Field Office
- US Forest Service - Intermountain Region
- US Geological Survey - WRD
- City of Rock Springs
- Sublette County Commissioners
- Sublette County Conservation District
- Sweetwater County Commissioners
- Sweetwater County Conservation District
- Town of Big Piney
- City of Green River
- Town of Jackson
- Town of LaBarge, Town Hall
- Town of Marbleton
- Town of Pinedale
- Office of the Governor
- Wyoming Department of Agriculture
- Wyoming Department of Revenue
- Wyoming State Engineer's Office
- Wyoming Department of Environmental Quality
- Wyoming Department of Transportation
- Wyoming Game and Fish Department
- Wyoming Geological Survey
- Wyoming Office of State Lands & Investments
- Wyoming Oil & Gas Conservation Commission
- Wyoming State Historic Preservation Office

NPL Natural Gas Development Project

Scoping Report

Appendix C

Tribal Consultation Letters

APPENDIX C

TRIBAL CONSULTATION LETTERS

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Ute Indian Tribe Cultural Resources

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
High Desert District
Pinedale Field Office
1625 West Pine, PO Box 768
Pinedale, WY 82941

TAKE PRIDE IN AMERICA

In Reply Refer To:
1790 (WYD01)

CERTIFIED MAIL 7010 1060 0000 1298 1989 RETURN RECEIPT REQUESTED

Betsy Chapoose
Director, Cultural Rights and Protection
Ute Indian Tribe Cultural Resources
P.O. Box 190
Fort Duchesne, UT 84026-0190

Dear Ms. Chapoose:

The Bureau of Land Management (BLM), Pinedale Field Office and Rock Springs Field Office would like to formally initiate government-to-government consultation with you regarding the proposed Normally Pressured Lance (NPL) Natural Gas Development Project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Department of the Interior, BLM, is preparing an Environmental Impact Statement (EIS) to address potential effects of the project proposed by Encana Oil & Gas (USA) Inc. (Encana).

The proposed natural gas development project is located within what is referred to as the Normally Pressured Lance (NPL) project area, adjacent to the Jonah Field, approximately 35 miles south of Pinedale, Wyoming. The project area comprises approximately 141,000 acres of lands administered by the BLM in Pinedale and Rock Springs as well as state and private lands. It is generally located within Townships 27 through 29 North, Ranges 107 through 110 West, and 6th Principal Meridian in Sublette County, Wyoming (see enclosed map). In compliance with NEPA, preparation of the EIS and associated Record of Decision (ROD) will enable the BLM to make future decisions that approve, modify, or deny anticipated Applications for Permit to Drill from Encana and associated rights-of-way in the project area.

Encana proposes to drill natural gas wells within the project area on an average of four multi-well pads per 640-acre section of land (approximately 3,500 wells). Each multi-well pad is proposed to average 18 acres per location. The wells, along with associated infrastructure, would be constructed over a 10-year period at a rate of up to 350 wells per year based on an average of 10 drill rigs working at any one time, or until the resource base is fully developed. Encana predicts an average life of 40 years per well. The extent of development will in part depend on the content of the EIS, ROD, and future permit decisions, including any environmental restrictions or limitations imposed by the BLM for operations proposed on BLM-administered lands.
The associated facilities proposed in the NPL project include roads, gas pipelines, powerlines, and separation, dehydration, metering, and fluid storage facilities to the extent such facilities are

not already constructed. Hydrocarbons and associated liquids are proposed to generally be transported via subsurface pipeline to consolidated or individual compression, processing, and treatment facilities. Produced water would be transported by truck or pipeline to produced water disposal wells, discharged on the surface under appropriate permits, or transported to onsite evaporation ponds. NPL project development could result in the use of roads previously constructed and currently used in the project area as well as the construction of new roads. New roads are expected to consist primarily of access roads, using existing arterial roads for main access to the project area.

The BLM in Pinedale and Rock Springs request your consultation and invite your input on the proposed project to ensure that any concerns, ideas, and questions you may have about the project are fully considered and incorporated into the environmental analysis at the earliest possible time. Please contact us if you have any concerns regarding this project, desire to visit the project location, or if you require further information. We invite your comments relating to cultural, environmental or any other issues regarding the proposed project which may be of concern to your Tribe.

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The BLM Pinedale Field Office has been designated the lead office for this project. For additional information on the proposed project, or to schedule a field visit, please contact Pinedale Field Office archeologist, Rob Schweitzer at 307-367-5325 or Robert_Schweitzer@blm.gov. Alternatively, you may contact Rock Springs Field Office archeologist Jaci Wells at 307-352-0240 or Jaci_Wells@blm.gov.

If you have any other questions please contact Kellie Roadifer, BLM Project Manager, at 307-367-5309 or Kellie_Roadifer@blm.gov.

We look forward to working with you on this project.

Sincerely,

Shane DeForest
Field Manager

Enclosure: Normally Pressured Lance Natural Gas Development Project Location Map

cc: District Manager, High Desert District
Field Manager, Rock Springs

Ute Tribal Council

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
High Desert District
Pinedale Field Office
1625 West Pine, PO Box 768
Pinedale, WY 82941

TAKE PRIDE IN AMERICA

In Reply Refer To:
1790 (WYD01)

CERTIFIED MAIL 7010 1060 0000 1298 1996 RETURN RECEIPT REQUESTED

Curtis Cesspooch
Chairman, Ute Tribal Council
P.O. Box 190
Fort Duchesne, UT 84026-0190

Dear Chairman Cesspooch:

The Bureau of Land Management (BLM), Pinedale Field Office and Rock Springs Field Office would like to formally initiate government-to-government consultation with you regarding the proposed Normally Pressured Lance (NPL) Natural Gas Development Project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Department of the Interior, BLM, is preparing an Environmental Impact Statement (EIS) to address potential effects of the project proposed by Encana Oil & Gas (USA) Inc. (Encana).

The proposed natural gas development project is located within what is referred to as the Normally Pressured Lance (NPL) project area, adjacent to the Jonah Field, approximately 35 miles south of Pinedale, Wyoming. The project area comprises approximately 141,000 acres of lands administered by the BLM in Pinedale and Rock Springs as well as state and private lands. It is generally located within Townships 27 through 29 North, Ranges 107 through 110 West, and 6th Principal Meridian in Sublette County, Wyoming (see enclosed map). In compliance with NEPA, preparation of the EIS and associated Record of Decision (ROD) will enable the BLM to make future decisions that approve, modify, or deny anticipated Applications for Permit to Drill from Encana and associated rights-of-way in the project area.

Encana proposes to drill natural gas wells within the project area on an average of four multi-well pads per 640-acre section of land (approximately 3,500 wells). Each multi-well pad is proposed to average 18 acres per location. The wells, along with associated infrastructure, would be constructed over a 10-year period at a rate of up to 350 wells per year based on an average of 10 drill rigs working at any one time, or until the resource base is fully developed. Encana predicts an average life of 40 years per well. The extent of development will in part depend on the content of the EIS, ROD, and future permit decisions, including any environmental restrictions or limitations imposed by the BLM for operations proposed on BLM-administered lands.
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If formal consultation is desired, we request that you send an official letter stating your tribal requirements, stipulations, and any recommendations to the BLM Pinedale Field Office Field Manager concerning project consultations. We have sent a copy of this letter to Ms. Betsy Chapoose, Director, Cultural Rights and Protection, as we believe her to be acting as the official cultural liaison for the Ute Tribe of the Uintah and Ouray Reservation. If this information is incorrect, please notify us of the correct person to contact.

The BLM Pinedale Field Office has been designated the lead office for this project. For additional information on the proposed project, or to schedule a field visit, please contact Pinedale Field Office archeologist, Rob Schweitzer at 307-367-5325 or Robert_Schweitzer@blm.gov. Alternatively, you may contact Rock Springs Field Office archeologist Jaci Wells at 307-352-0240 or Jaci_Wells@blm.gov.

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Sincerely,

Shane DeForest
Field Manager

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cc: District Manager, High Desert District
Field Manager, Rock Springs

Eastern Shoshone Business Council

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
High Desert District
Pinedale Field Office
1625 West Pine, PO Box 768
Pinedale, WY 82941

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In Reply Refer To:
1790 (WYD01)

CERTIFIED MAIL7005 1820 0005 7009 9951 RETURN RECEIPT REQUESTED

Harrison Shoyo
Chairman, Eastern Shoshone Business Council
P.O. Box 538
Fort Washakie, WY 82514

Dear Chairman Shoyo:

The Bureau of Land Management (BLM), Pinedale Field Office and Rock Springs Field Office would like to formally initiate government-to-government consultation with you regarding the proposed Normally Pressured Lance (NPL) Natural Gas Development Project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Department of the Interior, BLM, is preparing an Environmental Impact Statement (EIS) to address potential effects of the project proposed by Encana Oil & Gas (USA) Inc. (Encana).

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If formal consultation is desired, we request that you send an official letter stating your tribal requirements, stipulations, and any recommendations to the BLM Pinedale Field Office Field Manager concerning project consultations. We have sent a copy of this letter to Mr. Wilfred Ferris, as we believe him to be acting as the official cultural liaison for the Eastern Shoshone Tribe of the Wind River Reservation. If this information is incorrect, please notify us of the correct person to contact.

The BLM Pinedale Field Office has been designated the lead office for this project. For additional information on the proposed project, or to schedule a field visit, please contact Pinedale Field Office archeologist, Rob Schweitzer at 307-367-5325 or Robert_Schweitzer@blm.gov. Alternatively, you may contact Rock Springs Field Office archeologist Jaci Wells at 307-352-0240 or Jaci_Wells@blm.gov.

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Field Manager

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cc: District Manager, High Desert District
Field Manager, Rock Springs

Eastern Shoshone Tribe

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
High Desert District
Pinedale Field Office
1625 West Pine, PO Box 768
Pinedale, WY 82941

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In Reply Refer To:
1790 (WYD01)

CERTIFIED MAIL 7010 1060 0000 1298 1934 RETURN RECEIPT REQUESTED

Wilfred Ferris
Tribal Historic Preservation Officer
Eastern Shoshone Tribe
PO Box 538
Fort Washakie, WY 82514-0608

Dear Mr. Ferris:

The Bureau of Land Management (BLM), Pinedale Field Office and Rock Springs Field Office would like to formally initiate government-to-government consultation with you regarding the proposed Normally Pressured Lance (NPL) Natural Gas Development Project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Department of the Interior, BLM, is preparing an Environmental Impact Statement (EIS) to address potential effects of the project proposed by Encana Oil & Gas (USA) Inc. (Encana).

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Field Manager

Enclosure: Normally Pressured Lance Natural Gas Development Project Location Map

cc: District Manager, High Desert District
Field Manager, Rock Springs

Northern Arapaho Tribal Business Council

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
High Desert District
Pinedale Field Office
1625 West Pine, PO Box 768
Pinedale, WY 82941

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In Reply Refer To:
1790 (WYD01)

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Kim Harjo
Chair, Northern Arapaho Tribal Business Council
P.O .Box 396
Fort Washakie, WY 82514-0396

Dear Madam Chair:

The Bureau of Land Management (BLM), Pinedale Field Office and Rock Springs Field Office would like to formally initiate government-to-government consultation with you regarding the proposed Normally Pressured Lance (NPL) Natural Gas Development Project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Department of the Interior, BLM, is preparing an Environmental Impact Statement (EIS) to address potential effects of the project proposed by Encana Oil & Gas (USA) Inc. (Encana).

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We look forward to working with you on this project.

Sincerely,

Shane DeForest
Field Manager

Enclosure: Normally Pressured Lance Natural Gas Development Project Location Map

cc: District Manager, High Desert District
Field Manager, Rock Springs

Shoshone-Bannock Tribes of Fort Hall

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
High Desert District
Pinedale Field Office
1625 West Pine, PO Box 768
Pinedale, WY 82941

TAKE PRIDE IN AMERICA

In Reply Refer To:
1790 (WYD01)

CERTIFIED MAIL 7010 1060 0000 1298 1965 RETURN RECEIPT REQUESTED

Nathan Hall
Chairman, Shoshone-Bannock Tribes of Fort Hall
P.O. Box 306
Fort Hall, ID 83203-0306

Dear Chairman Hall:

The Bureau of Land Management (BLM), Pinedale Field Office and Rock Springs Field Office would like to formally initiate government-to-government consultation with you regarding the proposed Normally Pressured Lance (NPL) Natural Gas Development Project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Department of the Interior, BLM, is preparing an Environmental Impact Statement (EIS) to address potential effects of the project proposed by Encana Oil & Gas (USA) Inc. (Encana).

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If formal consultation is desired, we request that you send an official letter stating your tribal requirements, stipulations, and any recommendations to the BLM Pinedale Field Office Field Manager concerning project consultations. We have sent a copy of this letter to Ms. Carolyn Boyer Smith, Cultural Resource Coordinator HETO/Cultural Resources, as we believe her to be acting as the official cultural liaison for the Shoshone-Bannock Tribes of the Fort Hall Reservation. If this information is incorrect, please notify us of the correct person to contact.

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Field Manager

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cc: District Manager, High Desert District
Field Manager, Rock Springs

Shoshone-Bannock Tribes of Fort Hall

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
High Desert District
Pinedale Field Office
1625 West Pine, PO Box 768
Pinedale, WY 82941

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In Reply Refer To:
1790 (WYD01)

CERTIFIED MAIL7010 1060 0000 1298 1972 RETURN RECEIPT REQUESTED

Carolyn Boyer Smith
Cultural Resource Coordinator
Shoshone-Bannock Tribes of Fort Hall
P.O. Box 306
Fort Hall, ID 83203-0306

Dear Ms. Boyer Smith:

The Bureau of Land Management (BLM), Pinedale Field Office and Rock Springs Field Office would like to formally initiate government-to-government consultation with you regarding the proposed Normally Pressured Lance (NPL) Natural Gas Development Project. In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended, the U.S. Department of the Interior, BLM, is preparing an Environmental Impact Statement (EIS) to address potential effects of the project proposed by Encana Oil & Gas (USA) Inc. (Encana).

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We look forward to working with you on this project.

Sincerely,

Shane DeForest
Field Manager

Enclosure: Normally Pressured Lance Natural Gas Development Project Location Map

cc: District Manager, High Desert District
Field Manager, Rock Springs

Appendix D

Scoping Meeting Materials

APPENDIX D

SCOPING MEETING MATERIALS

TABLE OF CONTENTS

National Environmental Policy Act and Scoping Fact Sheet

Welcome!

The Bureau of Land Management (BLM) is in the process of preparing an Environmental Impact Statement (EIS) to evaluate the impacts of a proposed natural gas development project and is seeking public input on issues and alternatives that should be addressed in the EIS. Scoping meetings provide an opportunity for the public to learn about and comment on the project.

The National Environmental Policy Act (NEPA) requires federal agencies, including the BLM, to prepare an EIS that considers the following factors when a proposed project could result in significant effects:

- Input from public, agency, tribal, and other affected parties
- A reasonable range of alternatives
- Environmental consequences
- Social, economic, and human health consequences
- Mitigation and monitoring to reduce adverse impacts

What is scoping?

Scoping provides members of the public, agencies, and other affected parties an opportunity to:

- Learn more about the project
- Provide comments on the project
- Identify issues to be analyzed in the EIS

Making effective comments

Effective comments help ensure all issues are identified and addressed in the NEPA analysis. Please consider the following when making comments:

- State specific concerns instead of making broad statements
- Focus your comments on specific issues and provide supporting details
- Identify important environmental and community concerns

How do I submit comments?

Please complete a comment form and place it in the comment box at the scoping meeting. Comments can also be sent to the following mailing and e-mail addresses by May 12, 2011. Please note that by including your name and address on correspondence you agree the information may be made public as part of the EIS process.

Please send your comments to:

Kellie Roadifer, Project Manager
NPL Natural Gas Development Project
BLM Pinedale Field Office
1625 West Pine Street
P.O. Box 768
Pinedale, WY 82941
Email: NPL_EIS_WY@blm.gov

For more information, visit: http://www.blm.gov/wy/st/en/info/NEPA/documents/pfo/npl.html

NPL Natural Gas Development Project Fact Sheet

Project Description

Encana Oil & Gas (USA) Inc. proposes to drill natural gas wells within approximately 140,000 acres of BLM-administered land on an average of four multi-well pads per 640-acre section of land (approximately 3,500 wells). The wells, along with associated infrastructure, would be constructed over a 10-year period at a rate of up to 350 wells per year with an average life of 40 years per well. The proposed Normally Pressured Lance (NPL) project area is adjacent to the Jonah Field, approximately 35 miles south of Pinedale in Sublette County, Wyoming.

Normally Pressured Lance Project Area

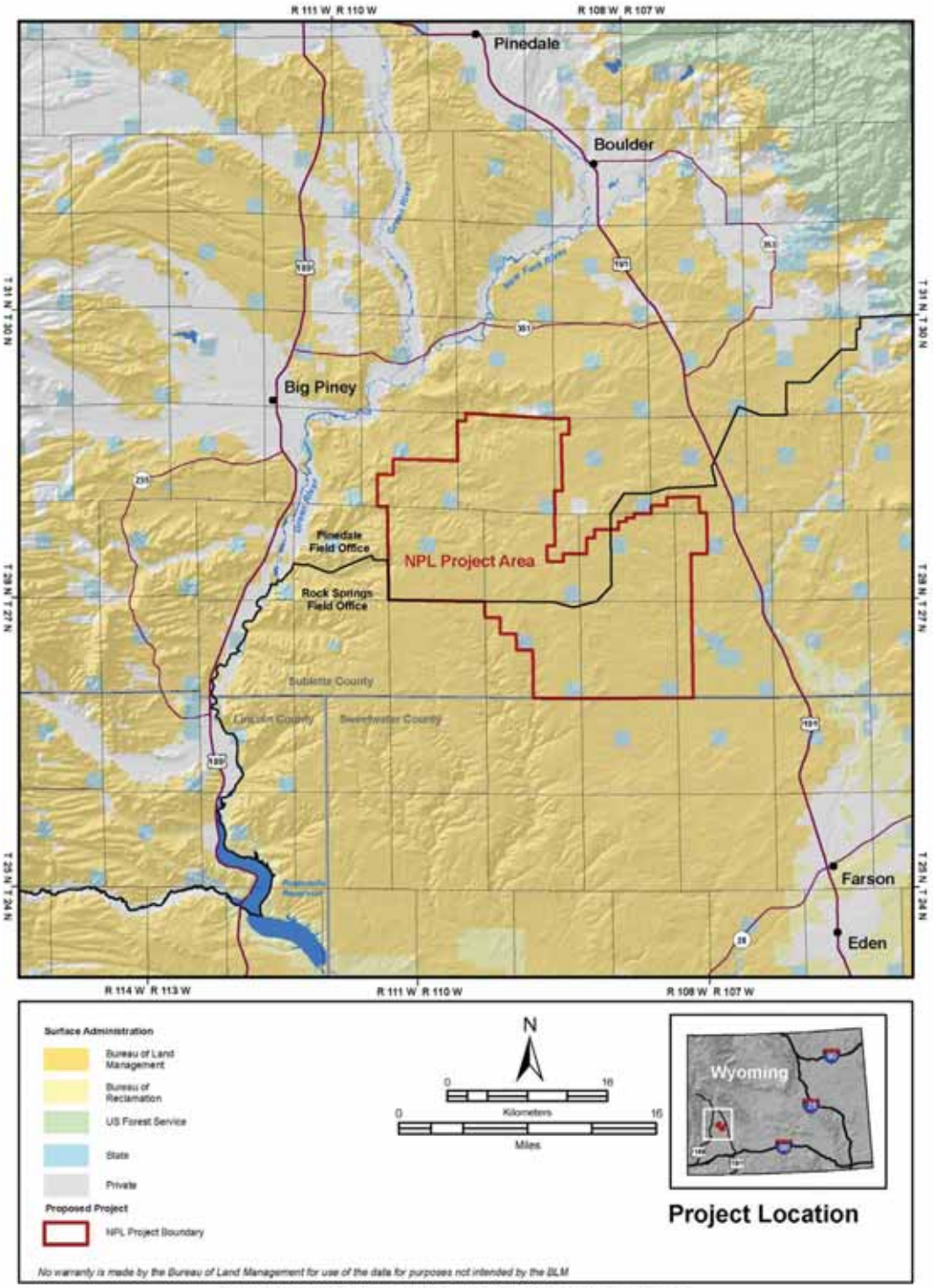
The proposed project would include:

- Approximately 140,000 acres of land administered by the Bureau of Land Management
- Multiple wells on an average of four multi-well pads per 640-acre section (approximately 3,500 wells)
- Construction over a 10-year period with an average of 350 wells per year
- Estimated initial surface disturbance of 5,429 acres (3.85 percent of project area)
- Average of 18 acres per multi-well pad
- Average life of 40 years per well

The project proposed by Encana includes the following components:

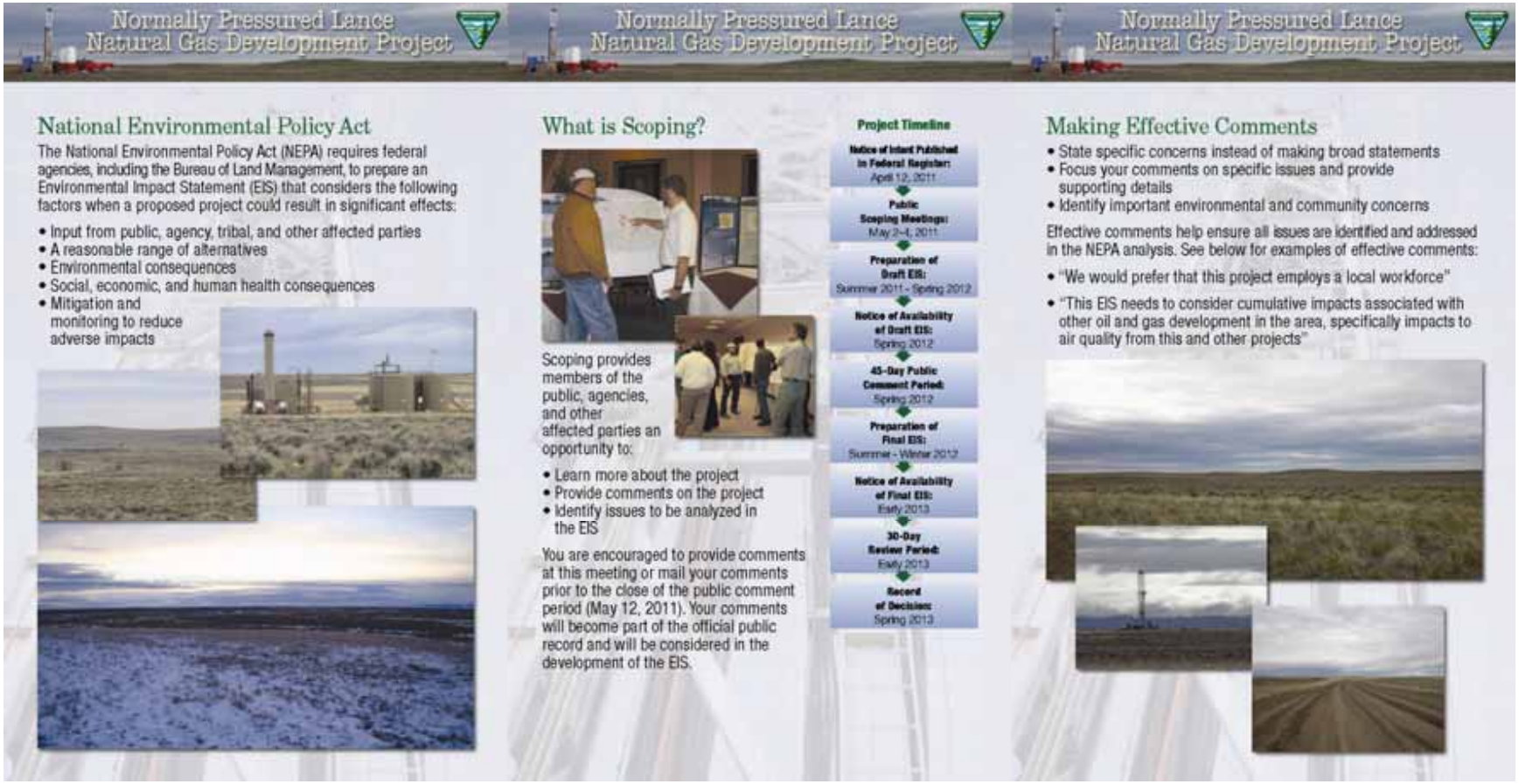
- Multi-well natural gas pads including drilling equipment
- Directional drilling from each multi-well pad
- Well completion using hydraulic fracturing
- Natural gas pipelines and powerlines
- 11 Regional Gathering Facilities including electric compressors, gas dehydrators, liquid storage and other equipment
- Compressor stations
- Access roads
- Installation of air quality monitoring equipment
- Reclamation would commence at each multi-well location after production equipment is installed

NPL Natural Gas Development Project Map Handout



Normally Pressured Lance Natural Gas Development Project

Bureau of Land Management Informational Scoping Boards



Normally Pressured Lance Natural Gas Development Project

Air Quality

- High wintertime ozone concentrations observed in the region
- Comprehensive inventory of emissions (including greenhouse gases) being prepared
- The EIS would address potential impacts to air quality and identify mitigation
- The project would implement air emissions reduction strategies

Social and Economic

- Approximately 700+ jobs during the 10-year development phase
- Approximately 175+ jobs related to production
- Workers would be housed at the existing workforce facility in the Jonah Field
- Work would likely continue at a consistent rate year-round

Normally Pressured Lance Natural Gas Development Project

Biological Resources

Wildlife associated with shrub-steppe and short-grass prairie habitats, buttes, rock outcrops, large draws, and deep canyons

Overlaps greater sage-grouse core population area

Big game habitat and movement corridors have been identified in the project area

Wild horses have been recorded in the southern and eastern extents of the project area

Raptor species include the burrowing owl, ferruginous hawk, golden eagle, and prairie falcon

Four BLM sensitive species, one ESA petitioned avian species and one ESA candidate avian species and two additional bird species of special conservation concern (USFWS)

Normally Pressured Lance Natural Gas Development Project

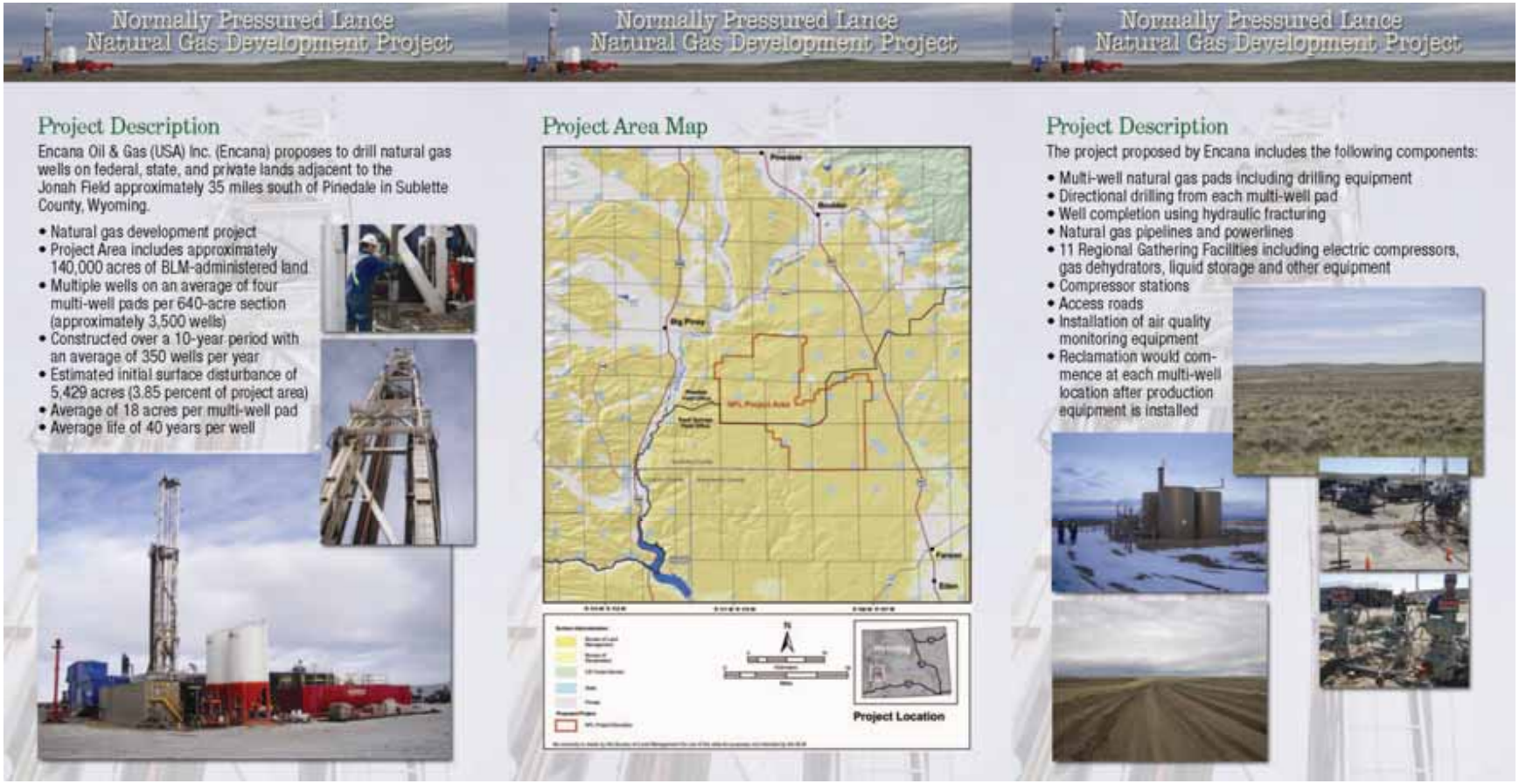
Surface Disturbance

- Existing disturbance includes approximately 70 gas wells and associated infrastructure
- Approximately 5,400 acres of initial short-term surface disturbance (3.85 percent of project area)
- Approximately 1,400 acres of long-term surface disturbance after reclamation (1.0 percent of project area)

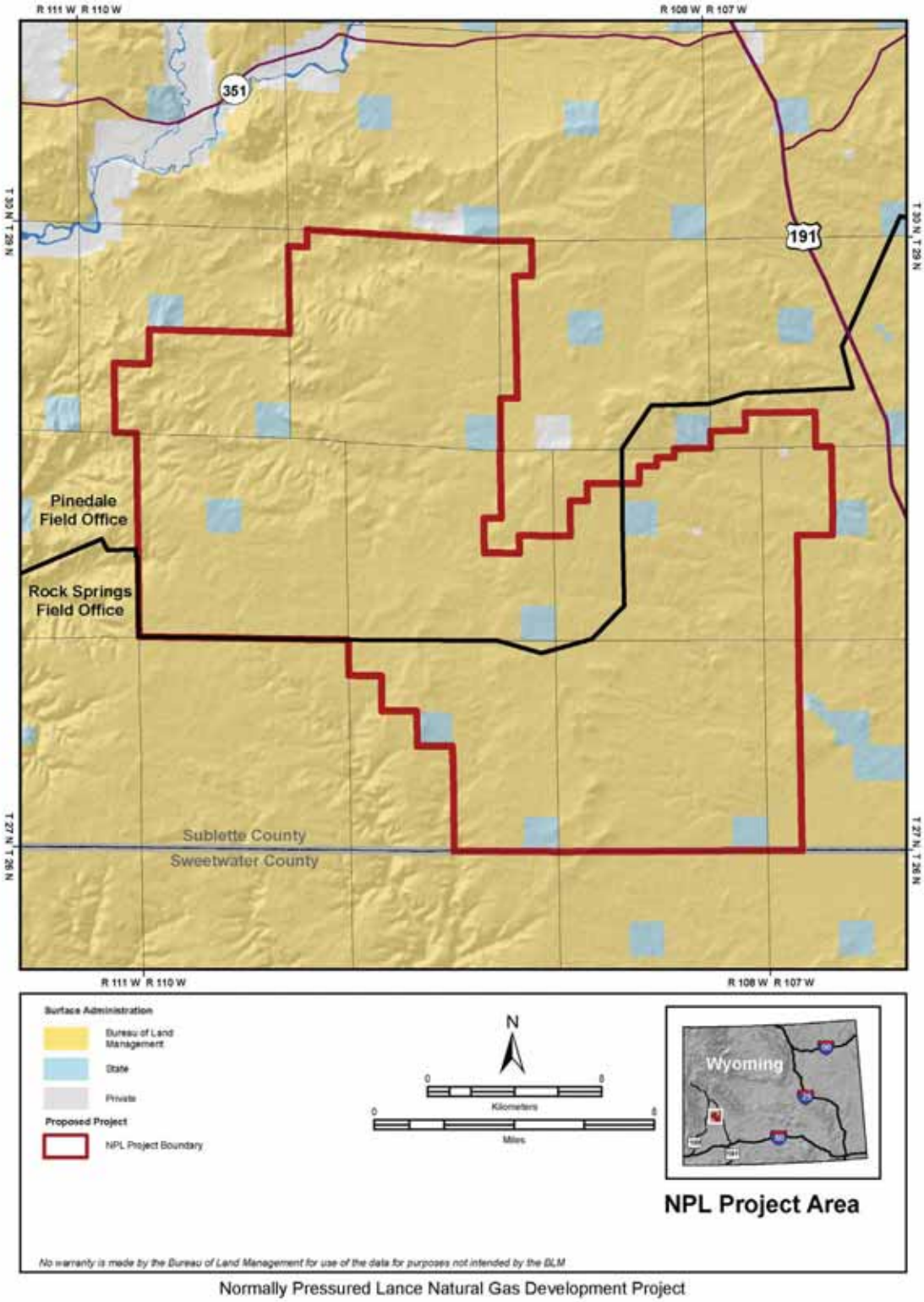
Water Resources

- Current uses of groundwater in the area include stock wells, industrial, oil and gas development, irrigation, temporary use, and domestic
- Deepest groundwater levels approximately 1,000 feet below surface
- Gas extraction would occur from between 5,500 and 12,500 feet below groundwater
- A groundwater monitoring program would include baseline studies, monitoring, and routine sampling

Encana Informational Scoping Board



Project Area Map



Normally Pressured Lance Natural Gas Development Project

Scoping Meeting Registration Card

Normally Pressured Lance Natural Gas Development Project Registration Card

Meeting Location *Meeting Date*

First Name *MI* *Last Name*

Organization

Phone *Email Address*

Mailing Address

City *State* *Zip Code*

☐ Please add my name and address to the mailing list so that I can receive information on the Normally Pressured Lance Natural Gas Development Project.

I wish to receive a copy of the **Draft EIS** (check one) ☐ printed copy ☐ notice of downloadable web copy

Normally Pressured Lance Natural Gas Development Project Registration Card

Meeting Location *Meeting Date*

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I wish to receive a copy of the **Draft EIS** (check one) ☐ printed copy ☐ notice of downloadable web copy

Scoping Meeting Comment Form

Scoping Comment Form
Normally Pressured Lance Natural Gas Development Project

MEETING LOCATION: _____ *DATE:* _____

Name:
Organization:
Address:
City/State/Zip:

☐ **Please add my name and address to the mailing list so that I can receive information on the Normally Pressured Lance Natural Gas Development Project.**

Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act (FOIA), you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals or officials representing organizations or businesses, will be made available for public inspection in their entirety.

THANK YOU FOR YOUR INPUT.

PLEASE PRINT LEGIBLY.

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Please leave this form in the comment submittal box at this meeting. If you take this form with you, please return via mail or email to:

Kellie Roadifer, Project Manager
NPL Natural Gas Development Project
BLM Pinedale Field Office
1625 West Pine Street, P.O. Box 768
Pinedale, WY 82941
Email: NPL_EIS_WY@blm.gov

To be included in the scoping report, comments must be postmarked by May 12, 2011.

Appendix E

Scoping Comments

APPENDIX E

SCOPING COMMENTS

TABLE OF CONTENTS

LIST OF TABLES

Commenters Listed by Document Number

Table E-1 includes all comment documents received by the Bureau of Land Management (BLM) during the scoping period and indicates the assigned document number.

Table E-1. Commenters Listed by Document Number

Document Number	Last Name	First Name	Agency or Organization Name
1001	CL	Brent	No affiliation indicated
1002	Whitman	Grant	Triangle 5 Ranches
1003	Tavoi	Philip C.	No affiliation indicated
1004	Roitz	Josh	Wise Services, Inc.
1005	Johnson	Thomas A.	No affiliation indicated
1006	LaRue	J. Michael	No affiliation indicated
1007	Szablewski	Daniel	No affiliation indicated
1008	Johnson	Bob	Homax Oil Sales
1009	Newsome	Damon	Wyoming Department of Transportation
1010	Fogerty	John	Pinedale Planning and Zoning
1011	Quirk	McKenna	No affiliation indicated
1012	Curry	Thomas	No affiliation indicated
1013	Curry	Thomas	No affiliation indicated
1014	Public	Jean	No affiliation indicated
1015	Jenkins	Ben D.	No affiliation indicated
1016	Pollard	Travis	Encana Natural Gas
1017	Hooks	Jim	No affiliation indicated
1018	Hohl	Dave	No affiliation indicated
1019	Yarnell	Aaron L.	No affiliation indicated
1020	Clark	Ronald	No affiliation indicated
1020a	Clark	Jan	No affiliation indicated
1021	Kaumo	Timothy A.	No affiliation indicated
1022	Peterson	Cole	No affiliation indicated
1023	Etcheverry	Ann	Encana
1024	Harnack	Jay	Sublette County School District #1
1025	Whicker	Glenn	No affiliation indicated
1026	Gwaltney	Julia	Encana Oil & Gas (USA) Inc.
1027	Steele	Terry L.	Encana Oil & Gas (USA) Inc.

Table E-1. Commenters Listed by Document Number

Document Number	Last Name	First Name	Agency or Organization Name
1028	Sheesley	Jim	No affiliation indicated
1029	Mount	Lee	Sweetwater County
1030	McGettrick	David D.	Encana Oil & Gas (USA) Inc.
1031	Thornhill	Chris	No affiliation indicated
1032	Clark	Bill	No affiliation indicated
1033	Kinnison	Allan	No affiliation indicated
1034	Laden	Juan	Black and White
1035	Smyth	Joe	No affiliation indicated
1036	Chase	Gerry	Sublette County School District #9
1037	Blair	Andrew	No affiliation indicated
1038	Perry	Ally	No affiliation indicated
1039	Ditton	Jordan	No affiliation indicated
1040	Strike	Mariah	No affiliation indicated
1041	Manatos	Joseph	JFC Engineers Surveyors
1042	Barraza	Antolin	No affiliation indicated
1043	Ennis	Jeremiah	No affiliation indicated
1044	Ellis	Nate	No affiliation indicated
1045	Cook	Joey	Pinedale High School
1046	Bishop	Jesse	No affiliation indicated
1047	Jensen	JW	No affiliation indicated
1048	Bloom	Greg	Kinder Morgan Energy Partners
1049	Duckworth	Savannah	No affiliation indicated
1050	Pape	Sydney	No affiliation indicated
1051	Price	Jim	No affiliation indicated
1052	McKee	Ryan	No affiliation indicated
1053	Stone	Brooke	No affiliation indicated
1054	Bermudez	Alejandro	No affiliation indicated
1055	Larsen	Lloyd Charles	No affiliation indicated
1056	Tomich	Roxanne	No affiliation indicated
1057	Peckler	Matthew	No affiliation indicated
1058	Ratner	Jonathan B.	Western Watersheds Project - Wyoming Office

Table E-1. Commenters Listed by Document Number

Document Number	Last Name	First Name	Agency or Organization Name
1059	Peckler	Mary	No affiliation indicated
1060	Cabot	Colleen	No affiliation indicated
1061	Lindsey	Travis R.	No affiliation indicated
1062	Wychgram	Dan	No affiliation indicated
1063	Stradtner	Nancy	No affiliation indicated
1064	Sharp	Julie	National Park Service - Intermountain Regional Office
1065	Bolles	Randy	Devon Energy Corporation
1066	Row	Wendy Sue	Hampton Inn and Suites
1067	Brown	Connie	Sublette County Commissioners
1068	Walters	Rick	No affiliation indicated
1068a	Hazlett	Larry Walter	Department of Theatre and Dance, University of Wyoming-Laramie
1068b	Taylor	Paul	No affiliation indicated
1068c	Hayward	Dan	Hayward Photography
1068d	Walker	Luke	No affiliation indicated
1068e	Lewis	Thomas L.	No affiliation indicated
1068f	Moss	Paul	No affiliation indicated
1068g	Panjabi	Arvind	No affiliation indicated
1068h	Huff	Stan	No affiliation indicated
1068i	Mesling	Chena	No affiliation indicated
1068j	Peirce	Susan S.	Canyonlights Photography
1068k	Wade	Lowell	No affiliation indicated
1068l	Evans	Dinda	No affiliation indicated
1068m	Mead	Kathy	No affiliation indicated
1068n	Seaton	Sean	No affiliation indicated
1068o	Toth	Donni	No affiliation indicated
1068p	Copeland	Holly	No affiliation indicated
1068q	Adams	Melissa	No affiliation indicated
1069	Irwin	Michele & Rob	No affiliation indicated
1070	Blazovich	Jim	No affiliation indicated
1071	Blazovich	Dianne	No affiliation indicated
1072	Blazovich	Jill	No affiliation indicated

Table E-1. Commenters Listed by Document Number

Document Number	Last Name	First Name	Agency or Organization Name
1073	Blazovich	Jerod	No affiliation indicated
1074	Kocornik	Diana	No affiliation indicated
1075	Vrooman	Mary	No affiliation indicated
1076	Shauers	Andy	JFC Engineers Surveyors
1077	Hazlett	Carolyn	No affiliation indicated
1078	Szymczak	Mike and Cathy	No affiliation indicated
1079	Wuerthner	George	No affiliation indicated
1080	Dobric	Nick	No affiliation indicated
1081	Fear	Betty	No affiliation indicated
1082	Evans	Dinda	No affiliation indicated
1083	Wischmann	Lesley	Alliance for Historic Wyoming
1084	Lozier	Sharlene	Encana Natural Gas
1085	Kelly	Brian	No affiliation indicated
1086	Ridgway	Richard	No affiliation indicated
1087	Quirk	Dari	No affiliation indicated
1088	Liska	Frank	No affiliation indicated
1089	Fuqua	Amanda	Encana Natural Gas
1090	Palmer	Michael	No affiliation indicated
1091	Smith	Michelle	No affiliation indicated
1092	Kimball	Spencer	Western Energy Alliance
1093	Martinez del Rio	Martha	Wyoming Chapter of Sierra Club
1094	Kleven	Bill	Rocky Mountain Bank
1095	Molvar	Erik	Biodiversity Conservation Alliance
1096	Kramer	Susan	Citizens United for Responsible Energy Development
1097	Gosar	Kevin	No affiliation indicated
1098	Morrison	Robyn	No affiliation indicated
1099	Wagner	John F.	Wyoming Department of Environmental Quality
1100	Mullen	John	Encana Oil & Gas (USA) Inc.
1101	Gibson	Jennifer	Encana Oil & Gas (USA) Inc.
1102	Thagard	Neil	Theodore Roosevelt Conservation Partnership
1103	Lapis	Ted	No affiliation indicated

Table E-1. Commenters Listed by Document Number

Document Number	Last Name	First Name	Agency or Organization Name
1104	Booth	Gwen	Wyoming Game and Fish Department
1105	Rawlins	C.L.	No affiliation indicated
1106	Winkel	John	No affiliation indicated
1107	Sorenson	Cheryl	Petroleum Association of Wyoming
1108	Bryant	Peggy	No affiliation indicated
1109	Baker	Linda	Upper Green River Alliance
1110	Botur	Freddy	Cottonwood Ranch
1111	Blair	Dan & Jan	No affiliation indicated
1112	Retzlaff	Ken	No affiliation indicated
1113	Patterson	Cynthia	No affiliation indicated
1114	Robles	Sam	Encana Oil & Gas (USA) Inc.
1115	Hindman	Alice	No affiliation indicated
1116	Germeles	Evangelos	Bridger Wilderness Institute, L3C
1117	Goddard	James & Lela	No affiliation indicated
1118	Kinnison	Jon	No affiliation indicated
1119	Wente	Jonathan	No affiliation indicated
1120	DeGraffenreid	Julie	No affiliation indicated
1121	Connelly	Kent	Board of County Commissioners, Lincoln County
1122	Di Brito	Larry	No affiliation indicated
1123	Pendery	Bruce	Wyoming Outdoor Council, Greater Yellowstone Coalition, and the Wilderness Society
1124	Bebout	Eli D.	Wyoming Senate
1125	Johnson	Wally J.	Sweetwater County Board of County Commissioners
1126	Schilling	Bill	Wyoming Business Alliance, Wyoming Heritage Foundation
1127	Fearneyhough	Jason	Wyoming Department of Agriculture
1128	Connelly	Kent	Coalition of Local Governments (County Commissions and Conservation Districts for Carbon, Fremont, Lincoln, Sweetwater, Uinta, and Sublette - Wyoming)
1129	Brutger	Steven	Trout Unlimited, Sportsmen's Conservation Project
1130	Bannon	Joy	Wyoming Wildlife Federation
1131	Svoboda	Larry	Environmental Protection Agency, Region 8
1132	Phillips	Randal	Encana

Scoping Comments by Issue Category

Table E-2 includes the comment document number and each comment made during scoping, reproduced as they were received by the BLM and organized by issue category. To identify the name of the person and/or organization who submitted a comment, locate the corresponding document number in Table E-1. Comment documents can be found in their entirety on the NPL Project website (http://www.blm.gov/wy/st/en/info/NEPA/documents/pfo/npl.html).

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
Air Quality	
1010	1. Fracking fleets often have extreme, excess emissions because the engines are either old or in need of serious work.
1010	4. During flow back (after well has been fracked, but before it has been put to the separator/to sales) there is far too long a period where gas is escaping straight to the atmosphere.
1010	Our air quality already sucks. During our high ozone days last winter, my 5-year old daughter had several nose bleeds and a dry cough for two weeks. She did not have a cold. She lives in Boulder where the ozone levels were at their worst.
1012	I was told by Engineered Concepts that Encana, who is testing the company's technology lost $80,000,000 in production through venting and flaring vs. Quantum Leap Technology. This is a loss of royalties, company profits and an increase in VOCs and NOx that adds to ozone production. It would be to everyone's best interest to capture and sell hydrocarbons vs. vent or burn them.
1018	With the existing ozone problem as yet unresolved on the east side of the Green River Basin with the existing rate of emissions, it is not appropriate to increase emissions yet more. Do not increase emissions until the current situation is resolved and the increase will not cause ozone formation above the legal standard.. If the project can be implemented with no emissions it would be acceptable. An increase in emissions is not acceptable at this point.
1022	Encana is very involved in helping the gas industry along, all while taking the public and environmental issues into account. EnCana's equipment are closed systems that all vent into combustors and burn up VOCs and other harmful vapors. This help to keep a low negative environmental impact. Encana also works closely with the BLM to meet or exceed expectations with all industrial issues and concerns.
1034	We used to have the best air in the country, now we exceed ozone pollution of even Los Angeles, California some days! I used to be able to see a hundred miles in this country most weeks out of the year as recent as back in the seventies. Now it is rare to see across the valley from the Wind River Mountains to the Wyoming Range or over to the Owl Creek Mountains.
1037	NOX and SOX are common emissions from gas field operations. Both NOX and SOX, as I understand it, are associated with increased acidification of precipitation. It is also my understanding that the impacts of such precipitation are highest in areas closer to the numerous point sources, such as the alpine lakes and streams of the Wind River Range, much of which is protected as Wilderness. I have read previous reports on the level of acidification in Wind River lakes and have noted that many of the lakes are listed as "sensitive" or "very sensitive". I know that this issue has been raised in previous objections to large scale gas projects in the Upper Green. I can only surmise that an additional gas field would put further pressure on these lakes and the local alpine ecosystem.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1037	4) This past winter brought several ozone warnings and ozone exceedences to the Upper Green River Valley. These exceedences took place despite the best efforts of the gas companies to reduce drill rig emissions and to reduce truck traffic to the fields as a response to previous exceedences. It is my understanding the EPA is expected to reduce the allowable level of ozone emissions further within the coming year. All things being equal (i.e. no big solutions to current levels of emission being on the horizon), I would expect the number of exceedences to increase with a lowering of the level of permissible ozone emissions even at the current level of development. I would expect ozone exceedences to become that much more frequent if an additional field is added into the mix.
1037	.....there is also the specter of environmental conditions coming together in just the right way for these exceedences to reach the level of a violation of the Clean Air Act. It is my understanding that if this were to take place this would negatively impact the level of gas production allowable in the Upper Green River Valley.
1040	I also believe that there are many concerns that need to be thoroughly researched before drilling begins. Ozone clearly has been a huge issue lately in Sublette County. What will the NPL do to lower emissions?
1042	The Ozone levels in this county have been significantly higher than previous years. Not only have these levels been rising but they have been rapidly affecting the environment around town. It is no surprise that the oil wells are responsible for these sudden changes. I believe that adding 3500 more wells would definitely make this problem a lot worse throughout the upcoming years. Whether cleaner wells can be produced or not is a matter that has to be taken care of for the future of the air quality around these parts.
1042	If the land proves to have profitable amounts of oil then I also believe that it would be smart to try to make the well a bit cleaner.
1043	Some of my concerns that I think should be accounted for before drilling starts, are that the air quality, especially in the winter, is not impacted by all the activity because winter after winter of super high ozone would not be good.
1044	However, I would like to stress that although the benefits are strong, there are a few concerns of both myself and of others I have spoken to on the issue. Primarily, the town and surrounding area's air quality. With Ozone levels being unstable to say the least I would like to see emissions from: rigs, vehicles, etc. closely monitored to prevent dangerous levels from re-appearing. With the levels of emissions being controlled I can say that the majority of my issues with the NPL proposal would be diminished.
1045	Air quality was pretty bad this winter, but if it happens again when this comes into play, then we know kind of how to counter it. By limiting use of things during certain times of the day this wouldn't be a problem.
1046	The bad thing about it though is that it will affect the air quality and make it even worse than it already is.
1047	On the proposal of NPL, there are many concerns that could possibly affect the Pinedale region. In the Pinedale region the air quality is of high concern,…
1049	I would like to see more environmental projects that include all of the following: air pollution, ozone monitoring, and…….If there is a way of asking them to put in more ozone monitoring stations in the NPL area this would be a good idea.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1053	Putting more rigs out there and getting more oil out will always bring more pollution and with the ozone being so bad lately and Pinedale and other little towns are liked for the clean air. People travel here and say that they enjoy the clean air, but with the more drilling we do the less of that clean air we have, soon we will have the air of a average city. You just need to be sure that your doing all you can to keep our clean air.
1054	But I have a few concerns about this project; I am worried about the air quality ....because I don't want this project to create more pollution in our area. And I have a few questions to ask about the air quality .... The first question is What EnCana is going to do about the air quality? Because this last winter we had a bad air quality.
1058	Unfortunately, this does not address the air quality issues. The thought that we can double the Sublette Co well count and reduce emissions from the current levels which already violate the CAA is absurd. The proposal needs to reduce to 30% of current emissions before any increases from the proposed be added in. So the alternative must implement actions to reduce real emissions (especially VOC and HAP) within PAPA, Jonah and LaBarge.
1060	In regard to the proposal to open drilling in the Normally Pressured Lance Natural Gas Field, it is incumbent on BLM to work with the state and energy companies to secure reductions in emissions of volatile organic compounds and nitrogen oxides—from the existing Pinedale-area energy development activities—before it can permit new projects. But not only must reductions in emissions be achieved, the reductions must be shown to be sufficient to prevent future violations of the ozone standard. Emissions reductions that do not prevent future violations are not enough. The pace of development must be slowed down.
1063	I believe it is incumbent on the agency to work with the state and energy companies to secure reductions in emissions of volatile organic compounds and nitrogen oxides—from the existing Pinedale-area energy development activities—before it can permit new projects. But not only must reductions in emissions be achieved, the reductions must be shown to be sufficient to prevent future violations of the ozone standard. Emissions reductions that do not prevent future violations are not enough+
1064	Clean air is a fundamental resource of the park and visitors place a high value upon unimpaired views of the spectacular Teton Range. Air pollutants are transported long distances and can affect the park through visibility reduction, biological and human health effects, and degradation of historic properties. The NPS has concerns regarding the effects of the project on the air quality in Grand Teton National Park, a designated Class I Airshed. The Clean Air Act tolerates no degradation of visibility in Class 1 Airsheds; therefore, this should be analyzed thoroughly in the EIS.
1064	Included in the air quality analysis, the BLM should examine the impacts of atmospheric deposition on sensitive lakes within the wilderness areas and the parks. Nitrogen and sulfur deposition are causes of concern for sensitive lakes in the national parks in northwest Wyoming. In Grand Teton National Park several lakes, particularly Delta, Surprise, Amphitheater, Mica and Lake Solitude have all been identified as being acid sensitive and should be included in the analysis.
1066	We are confident that Encana will mitigate the air quality impacts in this area as well.
1067	The environmental concerns associated with air quality in the region are of high importance. Any increases to total emissions volumes from this proposed project will possibly contribute to the deterioration of air quality, particularly with respect to impacts of elevated wintertime ozone on ..... impacts of reduced visibility on Class I areas.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1067	Thus, every effort should be made to reduce emissions from this proposed project, and all feasible emission reduction methods should be considered during mitigation development. For this to be accomplished, the existing air quality of the area must be accurately and fully characterized in the Affected Environment chapter of the EIS.
1067	Please consider an operator funded air quality monitoring station south of the project area.
1067	The air quality setting needs to discuss the location of nearby residential or sensitive receptors, particularly those located closer to the site than the nearest ambient monitor locations.
1067	The air quality setting needs to discuss the current National Ambient Air Quality Standards (NAAQS) attainment status and local monitoring data that shows compliance with and/or identifies exceedances of the NAAQS.
1067	Air quality trends and known seasonal air quality issues should be discussed in detail.
1067	Specific atmospheric chemistry issues, particularly ozone chemistry with regards to volatile organic compounds (VOC) and nitrogen oxides (NOx) emissions, should be discussed in sufficient detail and with sufficient technical references to support any related project impact and mitigation requirements findings.
1067	Address the feasibility of a goal to lower VOC emissions to nearly zero.
1067	The pollutant (criteria and air toxic pollutant) emission estimate calculations should be provided in an appendix to the EIS. This appendix should show all of the assumptions used to calculate construction and operation emissions. The construction pollutant emission estimate needs to include: ▪ Well pad construction emissions ▪ New road construction emissions ▪ New pipeline construction emissions ▪ Well drilling emissions ▪ Vehicle emissions from traffic supporting construction including heavy haul trips, all required support vehicle trips (such as fuel truck, worker sanitary facilities, water trucks, etc.), and construction employee trips. ▪ Fugitive dust emission estimates for all soil working activities (dozing, grading, etc.), vehicle unpaved and paved road travel, and wind erosion from disturbed areas. ▪ Clear assumptions regarding the control efficiencies for all proposed construction emissions and any needed mitigation measures.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1067	The pollutant (criteria and air toxic pollutant) emission estimate calculations should be provided in an appendix to the EIS. This appendix should show all of the assumptions used to calculate construction and operation emissions. The operation pollutant emission estimate needs to include: Well re-work drilling emissions. ▪ Gas and liquids processing facility emissions, including heaters, flares, etc. This should include both new facility emissions and any incremental operating emissions for existing facilities. ▪ Fugitive emissions from piping components (compressors, pumps, valves, flanges, pressure relief valves, etc.). ▪ Emissions from reasonably expected upset incidents based on historic records of such incidents. ▪ Vehicle emissions from traffic supporting operation including heavy haul trips, all required support vehicle trips (such as operation and management vehicle trips, water/soil binder trucks, etc.), and operation employee trips. ▪ Clear assumptions regarding the control efficiencies for any proposed operating emissions mitigation measures, and an assessment of whether the proposed controls meet regulatory requirements.
1067	Well drilling and well re-work drilling have the potential for major quantities of emissions, such as NOx. Therefore, technical support of the specific assumptions used for well drilling needs to be clearly provided. Specifically, the assumptions for the drill rig size and re-work rig size (engine numbers and horsepower) and duration needed to drill a well and re-work a well in this formation (i.e. total horsepower), as well as the assumptions for any proposed engine mitigation, need to be well documented and supported.
1067	A detailed impact analysis for criteria pollutant and visibility impacts should be included in the EIS and any air dispersion modeling that is included as part of this analysis should be fully described in the EIS. Air dispersion modeling files should be made available for review upon request.
1067	Impacts at the project fence line and at the nearest residential receptors should be assessed in the detail necessary to ensure that localized exceedances of the NAAQS will not occur at the fence line or impact residences or sensitive receptors.
1067	The potential for odor impacts during well drilling/re-work activities and project operation, based on both normal expected emissions and upset conditions, should be fully analyzed, and additional appropriate mitigation recommended where appropriate.
1067	General Conformity The attainment status for ozone in the project area could, based on recent year monitoring data, be redesignated as non-attainment prior to the project receiving final approval. If any re-designation to nonattainment for any NAAQS standard occurs prior the Record of Decision, a General Conformity determination by the BLM will be required for the project.
1069	Creating an advisory committee was a positive step, as was appointing Linda Baker with the Upper Green River Alliance. Issues of air ….quality need to be addressed from a larger point of view rather than incrementally.
1075	I know the air quality in that part of the state has been bad.
1078	In addition, we believe that no expansion should take place until the Ozone situation is solved in the Pinedale area.
1080	These comments are in regards to the proposed energy development near the Jonah field. I am concerned of any new permitting of any wells until the air quality situation improves.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1089	4) The air quality is a huge concern for individuals, but Encana has been working very hard to reduce emissions as much as possible. Various field shut downs have occurred, equipment has been installed, practices have been put in place, all in effort to reduce emissions as much as possible.
1090	Slow growth of any such project should also be taken into consideration to help mitigate existing air and water quality problems in the area. It may well happen that as there is more development, there will be even greater air quality problems than have recently been reported in the news regarding Pinedale.
1090	Air quality is also important to consider for the future of the Tetons and Yellowstone National Park. It would be sad if this area becomes even more well known as frequently having lower quality air than Los Angeles.
1091	Air quality stations should be controlled entirely by the DEQ. Even if Encana funds these monitoring stations, it should have NO input on their location.
1093	We have two primary areas of concern related to air quality in the Green River Basin of western Wyoming: ozone pollution and ..... Under provisions of the federal Clean Air Act, BLM regulations, and other authorities, the BLM is prohibited from authorizing any project that will or could lead to violation of National Ambient Air Quality Standards (NAAQS) for ozone, ... Ozone levels have exceeded NAAQS in the Green River Basin repeatedly in recent years, and the Upper Green River Valley is expected to receive nonattainment status from the Environmental Protection Agency (as requested by the State of Wyoming). The BLM is required to ensure that ozone NAAQS are not violated before any additional projects may be permitted. The BLM will need to require far more effective air pollution controls on existing development before even considering any new development, including higher offset levels by the Wyoming Department of Environmental Quality and more stringent best available control technology requirements. Furthermore, the BLM will need to demonstrate through quantitative modeling that emissions reductions on current and all new proposed development, all together cumulatively, will prevent violation of the ozone NAAQS.
1093	We have two primary areas of concern related to air quality in the Green River Basin of western Wyoming: ..... and visibility impacts to Class I areas. Under provisions of the federal Clean Air Act, BLM regulations, and other authorities, the BLM is prohibited from authorizing any project that will or could lead ....., to degradation of visibility in Class I areas, or to pollution increment limits for Class I and Class II areas. According to the Clean Air Act's prevention of significant deterioration requirements and nonattainment area new source review requirements, the BLM must ensure that both Class I and Class II area pollution increments will not be violated. We are concerned about air quality and visibility throughout the area, and especially concerned about visibility degradation in the nearby Bridger Wilderness Area, Popo Agie Wilderness Area, and Fitzpatrick Wilderness Area. The BLM should require that there will be zero days of visibility impairment in Class I areas, and should not approve the project if nonimpairment cannot be assured. Project proponents must be required to demonstrate through annual modeling that the development will not impair visibility at all in Class I areas.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1095	BLM should do a complete analysis of direct and cumulative effects of the project to air quality in the project area and surrounding region. This analysis should incorporate all air quality monitoring and ongoing scientific experiments that are occurring in the Upper Green River Valley, including those underway in the Pinedale Anticline and Jonah Fields and the neighboring Bridger-Teton National Forest.
1095	Ozone pollution is currently exceeding Clean Air Act standards in the developed fields to the east. The impact of additional ozone pollution and ozone precursors from the NPL project needs to be evaluated. We are concerned that the current Labarge Field may be a large source of methane leaks, volatile organic compounds (VOCs), and other pollutants due to the advanced age (and potentially poor repair) of oil and gas infrastructure there. Ozone precursors wafting off the condensate tanks for the Jonah and Pinedale Anticline Fields also pose problems. Mitigation measures for direct and cumulative impacts to air quality should include a complete evaluation of pollutant leaks in the existing fields and fixing present sources of pollutants so that overall airborne pollution is minimized.
1095	We are concerned about visibility impairment due to additional pollutants in the Wyoming Range, the Wilderness Areas of the Wind River Range, the Red Desert BLM WSAs such as Buffalo Hump, Sand Dunes, Whithorse Creek, Oregon Buttes, Pinnacles, Honeycomb Buttes, and Alkali Draw (which are downwind of the project area) and also in Jackson Hole and the National Parks that border it. Mitigation measures that minimize these pollutants should be required.
1096	The Bridger Wilderness is a class 1 air shed, which Congress has decreed to be off limits to pollution. How can the BLM think that this project will not significantly impact the area, given the failure of the industry to maintain good air quality in and around the Jonah and Anticline Fields?
1100	Which means less emissions in the long run. I have worked for them for over 6 years now and have personally seen great improvement overall. I can understand the Ozone concern, but we are getting better and better with emissions as time goes on. The plans for our field in a few years will drastically reduce emissions.
1105	……. foul the air, lakes, and streams of the Bridger Wilderness, a Class I CAA area.
1108	9. Use of power sources that reduce emissions of precursors to Ozone and various VOX and NOX.
1108	10. Tracking of air currents and volatile emissions that can contribute to increased potential for ozone in the surrounding areas, especially those areas affected by the rosette wind currents identified by University of Wyoming air studies that currently exist and affect the air in the La Barge and adjacent areas.
1109	We request that BLM require routing produced water, oil and gas directly from wells and/or separation equipment into underground central gathering systems to eliminate air pollution from production equipment and from heavy trucks and general traffic.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1109	We request that BLM consider requiring underground electrification of the NPL field, to the extent that it does not directly or indirectly impact sage-grouse leks, wintering and nesting areas. Underground electrification will eliminate pollution emission sources: 1) Process controllers (liquid level controllers, pressure controllers and temperature controllers) may be electrically operated rather than pneumatically operated with natural gas, eliminating volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions vented from natural gas-operated devices. 2) Pneumatic pumps normally operated with natural gas can be electric or can be operated with compressed air generated by electric air compressors. This would eliminate VOC and HAP emissions vented from natural gas-driven pneumatic pumps. 3) Natural gas vapors containing VOCs and HAPs that are released from oil and produced water storage tanks may be captured using electric vapor recovery units (VRU). The captured gas can fuel production equipment burners or can be compressed and routed into gas collection/sales lines. Not only would VOC and HAP emissions be eliminated, natural gas would be conserved. Also, emissions of nitrogen oxides (NOX) and carbon monoxide (CO) resulting from the flaring of these "waste streams" would be eliminated. 4) NOX and CO pollutants in the exhaust of natural gas fired compressor, pumping unit and generator engines would be eliminated when these engines are driven by electric motors. 5) At electrified facilities, electronic remote monitoring can be used to reduce site visits by field operators. For example, tank levels and equipment operating parameters may be monitored by computer. Electronic monitors can detect impending conditions or operating problems that result in pollution emissions to the air, land or water.
1109	We request that BLM require centralized facilities. Centralized facilities will 1) eliminate a number of pollution sources; 2) increase technical feasibility; 3) increase economically feasible emission control devices; and 4) reduce field traffic. 1) There are numerous pollution emission sources at individual well site facilities that are associated with production, separation and treatment, storage or sales. Each well stream must be separated into three streams, oil, water and gas, using traditional production equipment (water knockouts, separators and treaters). Then each stream must be routed into separate storage tanks, into gathering or sales lines, to an emissions control device or vented to the atmosphere. When two wells share equipment the number of emission sources can be cut in half. 2) The most common method for controlling VOC and HAP pollutants associated with tank vapors is to route the waste vapors to a combustion device. The volume and pressure of tank vapors can be low making it difficult to get the vapors to a combustor. Sometimes supplemental gas must be used to energize the waste stream. This is a waste of resources and increases NOX and CO emissions associated combustion waste streams. Waste stream volumes and pressures are increased when facilities are consolidated, making it easier to get the vapors to a control device and eliminating or reducing the need for supplemental motive gas. 3) The cost to control pollutants must be evaluated on a dollar-per-ton basis when establishing controllable emission thresholds. If the cost to control is too high the DEQ Air Quality Division must deem it economically unfeasible to control certain levels or types of emissions. The cost to control emissions decreases with consolidation. 4) Production sites must be visited on a regular basis by field operators. Also, it is common for produced water and oil to be transported by truck. Consolidation reduces truck traffic.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1114	Encana is an industry leader in application of cutting-edge air emission reductions technologies including: natural gas powered rigs, flare-less completions technologies, and many production related emission reduction technologies.
1115	It seems a lesson could have been learned from the previous gas-oil projects in the Jonah Field. The quality of the air in the area is terrible and the effect on ……...
1116	Second, please include in your consideration the FACT that in regards to air quality and also the ozone problem, the DEQ and ALL the operators in the area represented to the public in their recent public meeting that they DON'T KNOW WHERE THE FUGITIVE EMISSIONS ARE COMING FROM! Given that modeling has proven unsuccessful, as the Forest Service has stated in recent NEPA proceedings, you should take a much harder look at air quality issues in your EIS. *Indeed, prior BLM NEPA documents have proven to be patently false in regard to air quality issues.* In one iteration of the PAPA SEIS the BLM made the following representation regarding air quality: "[i]t is expected that there would be no violations to applicable federal and state air quality standards."1 The BLM's expectation was largely based on modeling and should there be problems, mitigation. It is well worth noting that the Ozone readings on March 2 carne not only during an ozone advisory issued by DEQ but also as the Operators were implementing mitigation measures to prevent NAAQS exceedances. It is significant that the recent readings, which place the area in non-attainment status, were not only NOT predicted by the BLM's modeling as reflected in its various SEIS drafts and ROD, but they were also NOT prevented by Operator implemented mitigation measures even though these Ozone events were successfully forecasted by the DEQ. Indeed, in this Eagle Prospect DEIS the Forest Service stated "a reliable wintertime 03 model is not currently available."2 On March 12,2009 Governor Freudenthal requested that all of Sublette County (in which the Eagle Prospect is located) be designated in non-attainment for 8 hour Ozone, which you note in the DEIS.3 EPA Region 8 Administrator Robert Roberts wrote to BLM Wyoming State Director Robert Bennett and rated the PAPA RDSEIS at "Environmentally Unsatisfactory - Inadequate Information" and requested revision and another public comment period.4 *It should be noted that the EPA's rating came at the end of a three and a half year NEPA process!* So my point is that it has become clear that there is a disparity between the projections of prior NEPA analyses in the Upper Green River Basin and the realities of 20 11.
1119	I am a believer in natural gas and the reduced emissions in comparison to all other fossil fuels. It seems as though Encana has proposed substantial commitments to reducing their emissions while developing the NPL. By consolidating the CDP's and using electricity, Encana will be able to greatly reduce the air emissions of the currently producing Jonah and during the development of the NPL.
1120	I find it hard to believe that this project is on the table when Sublette County has been unable to address the air quality issues it currently has. I am not just concerned about ozone - I am concerned with all the NOX and VOX that we breathe daily.
1121	Pave roads when they serve more than five well sites to reduce soil erosion and dust; Experience with other gas field developments shows that development can have significant dust and erosion impacts. BLM Gold Book calls for building the lowest standard road possible. Where a road serves several wells, the road needs to be paved to keep dust down and reduce erosion. Otherwise, during summer months, the resulting haze will adversely affect all uses, including the tourism industry.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1123	Air quality issues in the Upper Green River Valley are a dominant concern relative to this project. There are at least two major concerns: ozone pollution and impacts to visibility in nearby Class I areas. In our view this project cannot be permitted if it will contribute to continued violation of the ozone 8-hour National Ambient Air Quality Standard (NAAQS), or if it will lead to impairment of visibility in Class I areas.
1123	We will not belabor these comments with a detailed review of the ozone problems in the Upper Green River Valley. BLM is well aware of the extremely high ozone levels being monitored in this area, levels well in excess of the 8-hour ozone NAAQS, which is 75 parts per billion ozone (ppb). This area is poised to be designated in nonattainment with the 8-hour ozone NAAQS. The State of Wyoming has recommended nonattainment designation to the Environmental Protection Agency (EPA).
1123	Moreover, this summer the EPA will very likely establish a new 8-hour primary ozone NAAQS as well as a unique secondary ozone NAAQS. The new primary standard will likely be set in the range of 60-70 ppb and the secondary standard will be a season-long average level of 7-15 part per million-hours, with the purpose of protecting vegetation, especially in Class J areas. Thus, tile The nonattainment status of this area will likely become an even more dominant concern. We will touch on a few implications of the extreme ozone problems that plague this area.
1123	BLM is not permitted to authorize a project that will lead to the violation of Clean Air Act standards. The Clean Air Act provides, "[c]ach department, agency, and instrumentality of the executive. legislative, and judicial branches of the Federal Government (1) having jurisdiction over any property or facility, or (2) engaged in any activity resulting, or which may result in the discharge of air pollutants, and each officer, agent, or employee thereof, shall be subject to, and comply with, all Federal, State, interstate, and local requirements, administrative authority, and process and sanctions respecting the control and abatement of air pollution in the same manner, and to the same extent as any nongovernmental entity." 42 U.S.C. § 7418(a). Thus, the BLM cannot take any action that might lead to a violation of the ozone NAAQS or which perpetuates violation of the ozone NAAQS. Many BLM regulations and other authorities also prohibit permitting a project that could violate a NAAQS. For example, under BLM land use authorization regulations, BLM must provide terms and conditions for a project that "[r]equire compliance with air and water quality standards .... " 43 C.F.R. § 2920.7(b)(3). Many other similar provisions could be cited. See. e.g., BLM standard lease form 3100-11 section 6, 43 C.F.R. §§ 3161.2, 3162.I(a), 3162.5-I(a), 3162.5-1 (b).

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1123	Given the all but certain nonattainment status of this area, the BLM must ensure the ozone NAAQS is not violated before it can permit the NPL Project. And we note this: even if this area is not formally designated in nonattainment yet, that will certainly not be the case by the time this project is approved in two or three years. Consequently BLM must take steps now to address the pending nonattainment status. To meet this obligation, BLM is going to have to ensure that far more is done to control air pollution in this area than has been done in the past. For example, the Department of Environmental Quality's (DEQ) "offsets" policy is clearly not working, as shown by the extraordinary ozone levels this past winter. So sticking just with the current offsets policy will not meet BLM's obligations. The BLM must demand that greater levels of offsets be required by DEQ before it will approve this project. Similarly, it is obvious that the DEQ's oil and gas best available control technology (BACT) requirements are not sufficient to prevent violations of the ozone standard. Thus, more stringent BACT requirements must be put in place by DEQ before BLM can approve this project. Many other possibilities exist for reducing emissions, as described in our April 20, 2011 letter to BLM Pinedale Field Office Manager Shane DeForest and our April 26, 2011 letter to the Wyoming Air Quality Division, which we copied to Mr. DeForest.
1123	In the Federal Register Notice announcing this project BLM mentions several air pollution control measures that may be taken including a three-phase pipeline gathering system, electric compressors, and the use of remote telemetry. 76 Fed. Reg. 20,37l (April 12, 2011). While we appreciate these steps, these appear to be modest proposals. At a minimum BLM must ensure that these measures are sufficient standing alone to prevent violation of the ozone NAAQS, otherwise measures like an improved offsets policy and more stringent BACT requirements must be put in place by DEQ before this project can be approved.
1123	Similarly, in Encana's slide show that describes this project it claims that nitrogen oxide (NOx) and volatile organic compound (VOC) emissions from this project will be less than current emissions1. But BLM cannot just assume the company's claims are true, it must independently verify this claim. 40 C.F.R. § 1506.5 (providing that where an applicant submits environmental information for use in preparing an environmental impact statement, "The agency shall independently evaluate the information submitted and shall be responsible for its accuracy). BLM must validate through modeling that the claimed lesser emission level will in fact exist, and even if it will BLM must further determine that this level of emissions reductions is sufficient to prevent the current violations of the ozone NAAQS before it can open it the NPL Project. Let us emphasize this point: simply reducing emissions from this project is not sufficient to allow its approval; the only way this project can be approved is if BLM demonstrates (through quantitative modeling) that the emissions reductions are of a sufficient magnitude to prevent continued violation of the ozone NAAQS.
1123	As noted in the State's technical report requesting that EPA designate this area in nonattainment with the ozone NAAQS, "[t]he analysis conclusively shows that elevated ozone at the Boulder monitor is primarily due to local emissions from oil and gas (0&0) development activities: drilling, production, storage, transport, and treating."2. Thus, Sublette County is heading toward nonattainment status due almost entirely to the prior oil and gas development BLM has permitted. BLM cannot continue to exacerbate that problem by permitting more oil and gas development unless far more stringent pollution controls are assured.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1123	One important area of change will likely be related to new source review (NSR) requirements. In Wyoming, there will be NSR requirements for both major and minor sources of air pollution. For major sources of air pollution there will be two areas of NSR review, compliance with the Clean Air Act's prevention of significant deterioration (PSD) requirements and nonattainment area NSR. Nonattainment area NSR provisions will likely require the imposition of pollution controls on major sources that are more stringent than anything currently in place-namely requirements that the lowest achievable emissions rate, or LAER, be achieved. Under the Clean Air Act different levels of nonattainment are recognized relative to the ozone NAAQS (marginal, moderate, serious, severe, and extreme) and indications are that Sublette County will be found to be in the marginal or moderate category. If this is the case, any source of emissions that emits more than 100 tons per year of an air pollutant would be a major source subject to LAER. At a minimum, compressor stations will likely be deemed to be major sources subject to these enhanced requirements. Furthermore, we ask the BLM to also consider whether drill rigs are major sources that will be subject to LAER.
1123	Under PSD NSR, the BLM will have to ensure that both Class I and Class II area pollution increments are not violated. This will require that BACT be installed on major sources of emissions. We are particularly concerned that visibility in the Bridger Wilderness Area not be further impaired by this project and the BLM should ensure this is the case. Again, both compressor stations and drill rigs operating in this project area, under authority of BLM's decision in this matter, may be subject to these PSD BACT requirements.
1123	The BLM should put into place a requirement that there will be zero days of visibility impairment in the Bridger Wilderness Class I area, just as it did in the Pinedale Anticline Supplemental Environmental Impact Statement Record of Decision. We feel it is an open question as to whether this project can be approved while still assuring zero days of visibility impairment in the Class I area, and the BLM should not approve this project if non-impairment cannot be assured. Under the Clean Air Act the national goal is the "prevention of any future, and the remedying of any existing, impairment of visibility" in a Class I area. 42 U.S.C. § 7491(a)(I). The BLM should ensure this goal is met before approving the NPL Project.
1123	The project proponents should be required to engage in annual modeling showing that their development is not impairing visibility in the Class I area.
1123	Furthermore, the DEQ's 2005 report entitled Summary Report Southwest Wyoming N02 Increment Consumption Modeling: Results for Sublette County showed that nearly half of the Class II increment for nitrogen dioxide (NOL) was consumed in some areas of the Jonah field. Emissions from the NPL Project can only lead to further consumption of the permissible increment, and the BLM should fully consider this issue before permitting this project. BLM is not permitted to allow full consumption of the Class II increment. In any event, we again reiterate that since these additional NSR and SIP requirements will almost certainly be imposed within the foreseeable future, the BLM should not move to approve this project until these changes have been made and the new legal regime can be incorporated into the NPL Project environmental impact statement and record of decision.
1124	Encana understands the need to balance drilling activity with minimal impact on the environment. It has converted all drilling rigs to natural gas power, installed selective catalytic oxidation controls on all rigs, implemented flare less flow back green well completion technologies and is in the process of converting a large portion of its fleet of company vehicles to bi-fuel natural gas power. By implementing these measures, Encana continues to lead the way in reducing air emissions in Wyoming.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1126	Funding of air quality studies; Emissions will be below Jonah
1128	Wyoming DEQ and the counties continue to work through the causal factors for the Sublette County exceedances of NOx and volatile organic chemicals (VOCs), which are ozone precursors. The EIS must properly address the issues and the new information being developed by Wyoming DEQ and the regional air quality modeling.
1128	Air quality mitigation needs to distinguish among the air pollutants, such as particulates and ozone precursors of NOx and VOCs. Mitigation for each is quite different. The EIS must quantify how equipment modifications will reduce NOx and VOC emissions and not contribute to potential exceedances for ozone or other air pollutants. The EIS must also identify the other sources of air pollutants, such as wildfires, wood burning fireplaces, and the like that contribute to air quality degradation.
1129	The EIS must include an assessment impact to regional and local air quality associated with this large of a project.
1129	Dangerous emissions from oil and gas development continue to plague the Sublette County area. The Wyoming Department of Environmental Quality's 2009 technical analysis of the air quality in the region found that 94% of Volatile Organic Compounds (VOCs) and 60% of nitrogen oxides (NOx) –the two primary contributors to problematic emissions—are attributable to oil and gas production and development. The use of natural gas compressors, though considered less polluting than diesel compressors, nevertheless present a significant source of emissions into the atmosphere. The EIS should contain language that calls for the use of best available technology and equipment to decrease impacts to air quality.
1129	The proposal calls for developing 350 wells per year which results in a significant amount of emissions being released into an area that may not meet compliance with federal ozone standards. The EIS should require a phased approach that uses the best management practices which lessen impacts to air and the rest of the environment.
1129	The combined effect of the proposed project and the Jonah Field project must be evaluated in the EIS. Though the proponents are asking for a "smooth transition" from the Jonah to the NPL, it is questionable that the entire Jonah Field will be shut down by the end of 2013 (the expected implementation of the NPL project). Technical air quality analysis must be required prior to the full scale approval of the development of 350 wells per year.
1131	(1) Air quality impacts represent a critical concern that must be evaluated in the Draft EIS, with mitigation options considered and analyzed. With expanding energy development across the west, air quality has become an increasingly important issue. Given recent air quality trends in the Sublette County area, air quality will be a particularly significant issue for the NPL project. Not only is the proposed NPL project to be located entirely within the boundaries of the Wyoming Department of Environmental Quality's (Wyoming DEQ) proposed non-attainment area for the ozone National Ambient Air Quality Standard (NAAQS),
1131	it also would be located approximately 20 to 25 miles west of the Class I Bridger Wilderness Area. Under the Clean Air Act such areas enjoy special protection of air quality and air quality related values, such as visibility protection.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1131	The NPL's scoping notice appears to reflect a recognition by the project proponent, Encana, of the importance of air quality in the project area. EPA commends Encana for the approach taken in the NPL to incorporate several important and effective air quality mitigation measures. These measures include using: • natural gas drill rigs, • multi-phase gathering systems, and • flare less well completion practices.
1131	EPA understands that Encana has also proposed additional air quality mitigation to further reduce emissions. EPA looks forward to evaluating these during the EIS process.
1131	In view of the serious air quality concerns in the project area, the NEPA analysis for this project will need to carefully and thoroughly evaluate the proposed project's potential impact on air quality. • All criteria pollutants under the NAAQS, including ozone.
1131	To this end. EPA recommends that the Draft EIS disclose and analyze the project's direct, indirect, and cumulative impacts on: • Prevention of Significant Deterioration (PSD) increments.
1131	To this end. EPA recommends that the Draft EIS disclose and analyze the project's direct, indirect, and cumulative impacts on: • Ambient concentrations of hazardous air pollutants (e.g. formaldehyde, benzene. toluene. ethyl benzene, xylene, n-hexane); and
1131	To this end. EPA recommends that the Draft EIS disclose and analyze the project's direct, indirect, and cumulative impacts on: Air quality related values (AQRV) in Class I areas (e.g., visibility, deposition).
1131	Furthermore and depending on the schedule for this project, a General Conformity applicability analysis and determination may also be necessary. Such analysis would be required pursuant EPA policy and the General Conformity Rule (40 CFR 93, Subpart B), which applies one year after the effective date that EPA formally designates an area as nonattainment.
1131	EPA recommends BLM create an inter-agency air quality workgroup to discuss and develop an agreed upon approach to the air quality analysis, as has been done in conjunction with other energy development projects located in sensitive areas.
1131	Dust particulates from construction, vehicle travel on unpaved roads, and ongoing operations are an important concern. The airborne dust may not only be a visual nuisance, but can potentially be dangerous to asthma sufferers. Sedimentation from storm water run-off can also severely impact the aquatic environment. EPA recommends the Draft EIS include detailed plans for addressing dust control for the project. We suggest the plan include, but is not limited to: dust suppression methods, inspection schedules. and documentation and accountability processes.
1132	The IBLA has recognized Wyoming's authority to enforce the NAAQS within the state, including federal lands: In Wyoming, ensuring compliance with Federal and State air quality standards, setting maximum allowable limits (NAAQS and WAAQS) for six criteria pollutants CO (carbon monoxide), $S0_2$ (sulfur dioxide), NO_2, ozone and particulate matter (PM_{10} and $PM_{2.5}$), and setting maximum allowable increases (PSD Increments) above legal baseline concentrations for three of these pollutants (SO_2, NO_2, and PM_{10}) in Class I and Class II areas is the responsibility of WDEQ, subject to EPA oversight.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1132	***Wyoming Outdoor Council, el al., IBLA No. 2006-155, Order at '12 (June 28, 2006).*** Congress added the PSD program to the CAA in 1977 to ensure that economic growth would not adversely impact areas with pristine air. The PSD program applies throughout Wyoming because the state has attained the NAAQS. As part of the PSD program, Congress has required EPA to set increments for Class 1, II, and III areas, new major facilities to implement Best Available Control Technology (BACT), and new major facilities to demonstrate that they will not cause or contribute to a violation of the increments. See 42 U.S.C. §§ 7473, 7475, 7479. The PSD program as a whole protects the increment goals. ld.
1132	Congress promulgated the national visibility goal to prevent future, and remedy existing, impairment of visibility in mandatory Class I federal areas. See 42 U.S.C. § 7491. To accomplish this goal, Congress set forth a program that addresses impairment from existing and proposed major stationary sources, and a program to address RH-haze that often results from the transportation of pollutants hundreds of miles from the source. ld. The State of Wyoming has implemented the visibility program addressing existing and proposed major stationary sources, and is currently developing its RH SIP to further improve visibility in Wyoming. These programs function together to protect Wyoming's air quality.
Climate Change	
1026	Natural gas development is critical for our country's energy independence and reduction of greenhouse emissions. In addition, natural gas produces 25% less CO2 emissions than oil, 50% less CO2 emissions than coal and virtually no particulates.
1067	Greenhouse gas emissions should be estimated for construction and operation activities and climate change should be addressed per current NEPA guidance.
1095	The greenhouse gas emissions from this project, both direct and cumulative, need to be analyzed fully and mitigation measures will be needed to minimize these emissions. Such mitigation measures should include at minimum piping of condensate in order to minimize VOC emissions at condensate tanks.
1107	Moreover, clean-burning natural gas is becoming more important in efforts to reduce carbon emissions and impacts to climate change because electricity generated from natural gas emits much less carbon than electricity generated from other sources. The NPL Project exemplifies the responsible development of the federal public lands to increase domestic energy sources.
1131	Climate change and greenhouse gas (GHG) emissions remain a key required component of NEPA analyses. Pursuant to Council on Environmental Quality (CEQ) guidance and Executive Order 13514 and given that oil and natural gas systems are the biggest contributor to methane emissions in the U.S. EPA recommends the Draft EIS include an analysis and disclosure of greenhouse gas emissions and climate change.
1131	For the NEPA analysis. we suggest a four-step approach: I. Quantify and disclose projected annual and total project lifetime cumulative GHG emissions in CO2-equavalent terms and translate the emissions into equivalencies that are easily understood from the public standpoint (e.g., annual GHG emissions from x number of motor vehicles, sec https:llwww.epa.gov/RDEE/energy-resourcesicalculator.html). In addition, because information on the "downstream" indirect GHG emissions from activities such as refining may be of interest to the public in obtaining a complete picture of the GHG emissions associated with the proposed project, it may be helpful to estimate and disclose them.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1131	Please describe any potential inconsistencies between the proposed action and any relevant Regional, Tribal or State climate change plans or goals, as well as the extent to which BLM would reconcile, through mitigation or otherwise, it's proposed action with such plans.
1131	2. Qualitatively discuss the link between GHGs and climate change, and the potential impacts of climate change. As discussed in the 20I0 CEQ Draft Guidance, the estimated level of GHG emissions from the project and its alternatives can also serve as a reasonable proxy for assessing potential climate change impacts, and provide decision makers and the public with useful information for a reasoned choice among alternatives.
1131	3. Include a summary discussion of ongoing and projected regional climate change impacts relevant to the action area based on U.S. Global Change Research Program assessments. EPA also recommends that the EIS identify any potential need to adapt the proposed action to these effects, as well as any potential impacts from the proposed action that may be exacerbated by climate change (e.g. Would reclamation become more difficult with climate change? Will there be increased impacts 10 water resources from the project's water consumption?).
1131	4. Analyze reasonable alternatives and/or potential means to mitigate project related GHG emissions. We recommend the Draft EIS include analysis of appropriate mitigation measures (e.g. mitigation measures from the Gas Star Program).
1132	Furthermore, clean burning natural gas is becoming increasingly important in efforts to reduce carbon emissions and impacts to climate change. Electricity generated from natural gas results in roughly half the carbon emissions than electricity generated from coal. For this reason, increased reliance on natural gas is viewed as a means to reduce carbon emissions while maintaining energy supplies. See S. Pacala & R. Socolow, Stabilization Wedges: Solving the Climate Problem/or the Next 50 Years with Current Technologies, 305 Science 968, 969 (Aug. 13, 2004); Keith O. Rattie, The Role of Natural Gas in a Carbon-Constrained World, Landman, at II (Nov/Dec. 2007).
Cultural	
1083	These statements of national policy, mandating federal agencies to "preserve for public use" historic places "for their inspiration," are especially significant in regards to this massive development project.
1083	While we have numerous concerns about specific sites that might be impacted by this development going forward – in particular, the view sheds of national historic trails and their cutoffs and alternatives as well as the many unique archaeological resources that have recently been discovered in this area, including pit houses – our overwhelming concern is with how this project would fundamentally alter the historic nature of this region. Instead of a rural western landscape with unimpeded, open vistas of the type that characterize the stereotypical Wyoming view shed, this project would forever transform this region of our state into an industrial landscape more reminiscent of what is found in eastern states. This would be a tragic loss of not only our historically unparalleled vistas but, more importantly, of the western identity that has defined our state and its people from the very beginning of human history in this area. The kind of loss that we would experience as a result of this proposed project simply cannot be overstated.
1083	This proposed project would absolutely short circuit the ability of future generations to enjoy "this irreplaceable heritage." In fact, with the type of industrialized development contemplated in this proposal, it would probably be difficult for future generations to even imagine the heritage that will have been taken from them.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1083	These findings place a high burden on our country's land management agencies to ensure that all possible steps be taken to ensure the protection of our historic and cultural resources for future generations. And while this section refers specifically to the "built environment," it is clear that the intent of the overall legislation includes protecting the heritage that is unique to a specific area. In Wyoming, of course, that heritage includes our open spaces and unlimited, grand vistas as well as our unspoiled air and water – all of which would be jeopardized by further industrialization of this area.
1083	We would also remind you that, under NHPA, your first obligation in regards to historic resources is avoidance of these resources and, only when that is not possible, the minimization of impacts. By denying the permits to pursue this project, you will be taking the only possible step to avoid the unavoidable destruction this project would produce for this historic landscape and all of the specific resources that lie within the project area. There is simply no other response that would comply with your obligation to avoid and minimize impacts to known resources, i.e., the historic landscape. Mitigation as a solution is only acceptable once these other options have proven impossible. Therefore, we again urge you to reject this proposed project as it will cause damage to known resources, which simply cannot be adequately mitigated.
1083	Finally, we want to emphasize the importance of developing a comprehensive monitoring and cultural resource discovery plan for this project, should it be allowed to proceed. A wide variety of these plans are in existence, some better than others. However, it is vital that a comprehensive plan be available for review by the public and that it be thoroughly vetted by those who have requested interested party status under Section 106. We believe it should also be prominently attached to future NEPA documents on this project. Only with an accepted and well understood comprehensive monitoring and cultural resource discovery plan can you ensure that any unexpected discoveries encountered during the course of this project are handled properly. This is especially true whenever you are working around archaeological sites tied to Native Americans or the old emigrant trails because of the strong potential for uncovering human remains in these areas. This is especially important not only to ensure proper compliance with NAGPRA but also because Wyoming currently lacks a comprehensive state statute regarding the discovery of human remains.
1095	It is unclear how close this project comes to the Lander Cutoff of the Oregon Trail, and what other historic sites, such as rendezvous sites and prehistoric/protohistoric archaeological sites, may be involved with this project area. Historic trails and sites eligible for the National Register of Historic Places should be given a wide berth, and well sites should not be sited within 5 miles of such sites (this is the foreground/middleground distance for the setting, which is federally protected under the NHPA).
1095	A variety of tribes, including the Shoshone, Arapaho, Lakota, Bannock, Comanche, and Ute should be consulted to identify Traditional Cultural Properties and strong and appropriate protections can be developed for such sites.
1125	In addition to the above, since the Sublette Cut-Off of the Oregon Trail is located along the northern boundary of Sweetwater County near the NPL Project area Sweetwater County encourages special care when developing in close proximity to this historic trail.
1128	If sites or trails have been obscured or are invisible, then they should not be included in the assessment. National Park Service, How to Apply the National Register Criteria for Evaluation, National Register Bulletin No. 51 p. 46 (1995), (NRB #51) (a protected site must retain its original character to meet the integrity criteria).

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
Cumulative Impacts	
1064	cumulative impacts, and the persistence of pronghorn in GTNP and the Jackson Hole area.
1064	The park recommends that impacts to the greater sage-grouse, including cumulative impacts, be analyzed. Although this project will not impact the park's grouse population, it may affect the greater sage-grouse population regionally. Project impacts may cause further loss of grouse habitat and future declines in the population. The park recommends that impacts to the greater sage-grouse, including cumulative impacts, be analyzed.
1064	Water quantity and quality should be looked at cumulatively with all other current and proposed gas and oil exploration and production in the area and its potential effects on ecosystem health.
1064	Water quantity and quality should be looked at cumulatively with all other current and proposed gas and oil exploration and production in the area and its potential effects on …….the local community's quantity and quality of domestic water.
1064	In general, the NPS has concerns regarding local air quality due to the cumulative emissions from all the oil and gas development activities in adjacent counties: drilling, production, storage, transport, and treating. Ozone is a problem of increasing magnitude in western Wyoming with recent exceedances of National Ambient Air Quality Standard (NAAQS) for ozone recorded. At a minimum the analysis should include the effects of emissions from current and future drilling to ozone levels in Grand Teton National Park.
1067	Cumulative air quality impacts from emissions resulting from drilling and production activities should be considered in detail, and include all other oil and gas development being implemented and proposed in Southwest Wyoming that may contribute to current and future effects to air quality.
1067	We believe that the impacts from this proposed project will likely have significant impacts on multiple resource areas. Therefore, the Cumulative Effects analysis needs to be inclusive for all projects in the area and have appropriately defined analysis boundaries per resource.
1069	The cumulative impacts of all development and the population related impacts that come with it have had a detrimental impact upon our native wildlife and the ecosystem that supports them.
1095	It is clear that the cumulative level of air quality impact from drilling and production operations in the Upper Green (without a 3,500-well expansion) is presently leading to levels of air pollution, particularly for ozone, that are illegal under the Clean Air Act. As noted above, wildlife populations have been harmed by the level of development that has already been seen (and maximum development has yet to be reached on both existing fields). Now it appears that the drilling will not indeed be limited to the Anticline and the land between the faults at Jonah, but is expanding into a major basin-centered play that could extend throughout the Upper Green on lands currently under lease or available for future lease. We are concerned that the cumulative level of development in the Upper Green is reaching a tipping point beyond which native wildlife, clean air, and water quality will no longer be maintained.
1095	BLM will need to analyze cumulative impacts of the Normally Pressured Lance Project together with other industrial projects/impact sources in neighboring lands, including but not limited to: the existing Labarge oil field, the Riley Ridge field, scattered wildcatting wells along the flanks of the Wyoming range, the South Piney Coalbed Methane Project (which is reasonably foreseeable because it is also in the NEPA process), the Jonah and Pinedale Anticline Fields, the Moxa Arch Field, ExxonMobil's Shute Creek plant, and the Viva Naughton coal-fired power plant.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1095	Mule Deer. We are concerned that this project will have direct and cumulative impacts on mule deer herds……
1095	Native fishes. We are concerned about the direct and cumulative impact of the project on native fish populations, particularly Colorado River cutthroat trout, roundtail chub, bluehead sucker, and flannelmouth sucker.
1095	BLM should do a complete analysis of direct and cumulative effects of the project to air quality in the project area and surrounding region. This analysis should incorporate all air quality monitoring and ongoing scientific experiments that are occurring in the Upper Green River Valley, including those underway in the Pinedale Anticline and Jonah Fields and the neighboring Bridger-Teton National Forest.
1095	BLM will need to analyze cumulative impacts of the Normally Pressured Lance Project together with.....Impacts to water quality and quantity should include potential impacts of coalbed methane development, water development and dam projects including the Million Conservation Resource Group transbasin diversion, and potential oil shale development in the area.
1102	1. Cumulative impacts to fish, wildlife (and their habitats), and outdoor recreation from the previously developed and authorized energy projects in the upper Green River, including, but not limited to, the Jonah Infill, Pinedale Anticline, Fontenelle, Big Piney/LaBarge, Riley Ridge, South Piney, Plains Exploration/Noble Basin, Jack Morrow Hills, and other adjacent energy development projects.
1104	Cumulative wildlife and habitat impacts as a result of increasing intensity of oil and gas development in the region.
1108	13. Cumulative impacts of the proposed field with the adjacent Jonah and Pinedale Anticline fields on all natural resources and the human population.
1110	The additional densities planned for the Anticline and the Jonah, the possible development of 3500 wells in the Normalized Pressure Lance, cumulated with EOG's proposed 800 new wells in La Barge requires a broader view of the available resources and impacts. While RMP's act as individual management guidelines, the Rock Springs RMP needs to recognize the Wyoming High Desert District (WHDD) as a whole, as it is the largest management area and the overseeing office.
1127	It is vital PFO evaluate all resources at the same level to ensure they are managed cumulatively. For example, the NPL must include a travel management plan relating to livestock grazing operations and adjacent gas field development operations. More importantly, the NPL needs to look outside the project area and make sure it considers adjacent activities in this planning effort.
1128	The EIS also needs to specifically identify the cumulative effects area for the project by major resources, air shed, wildlife habitats, hydrology, soils, and the social-economic area. The Pinedale RMP FEIS and maps provide useful guidance and could be incorporated.
1128	The extent of energy development in the affected Sublette, Lincoln, and Sweetwater Counties suggests that there may be significant cumulative effects. The EIS needs to include planned projects such as the Hiawatha Regional Infill Development, and more modestly sized projects that are being evaluated in EAs.
1129	The BLM must consider and complete a comprehensive analysis of the cumulative impacts to aquatic life resources. This analysis must include potential impacts to the Ross Butte Management Area which lies adjacent to the NPL and next to the Green and New Fork Rivers.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1130	Develop a landscape scale cumulative impacts analysis that addresses the development within and outside of the proposed project are. In creating this analysis, the BLM should use the most up-to-date big game seasonal range designation maps that the WGFD will provide.
1130	Provide a cumulative effects scenario that illustrates what may occur to species that are impacted from this proposed development and from the other existing and projected developments.
1131	It is important particular attention be directed at evaluating and disclosing the cumulative effects of increased levels of erosion and sedimentation.
1131	In addition to the evaluation and discussion of direct and indirect impacts, EPA recommends the Draft EIS provide cumulative impact analyses for resources of concern. It is important the Draft EIS analyze impacts within and beyond the project boundaries using air sheds and watersheds, rather than political boundaries to define the scope of this analysis.
1131	EPA strongly recommends that the assessment include the cumulative impact of reasonably foreseeable energy development, energy-related activities and other activities that may affect air quality, water quality and other resources of concern in the area (e.g. wildlife). The purpose of this essential analysis is to assess the incremental impacts on each resource of concern due to connected and unconnected actions that take place in a geographic area over time (i.e., past, present and future) no matter which entity (public or private) undertakes the actions. Cumulative impact analysis aids in identifying the level of significance of those impacts on a particular resource and the appropriate type and level of mitigation required to offset the current proposal's contribution to these impacts.
Health and Safety	
1029	We have already seen dramatic negative effects on …….. people in the Pinedale Anticline.
1037	Governor Mead has voiced concern about ozone warnings in the Upper Green recommending that the young and old stay in-doors and that all people refrain from aerobic exercise. Aside from the health impacts to the people living in this area,……..
1038	Due to recent ozone levels in the town I think that air quality should be managed. Even though I personally felt no effect from the increase ozone levels, the older people in the community are definitely a priority.
1040	Please keep in mind the safety of all while considering the NPL.
1047	With the air quality already at an astonishing high pollution level, the risk of more danger from more wells is a factor for more pollution. In this case the a large amount of time needs to be spent making sure that county has safe air quality. .....but we as a community must be ensured a safe place to live.
1052	My third and most important concern is that of air quality. For some reason I feel this intense feeling to breathe every once in awhile, and it would be lovely if I did not taste car exhaust when I do so. Second hand smoke is said to kill, I can only imagine what will happen if our air quality continues the way it is. But all I can do is ask, nicely. So please don't make the air look like China's.
1063	The above words are taken directly from the Wyoming Outdoor Council webpage. I could not have put it better when it comes to the human communities that will be impacted…….

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1067	The environmental concerns associated with air quality in the region are of high importance. Any increases to total emissions volumes from this proposed project will possibly contribute to the deterioration of air quality, particularly with respect to impacts of elevated wintertime ozone on human health .....
1069	The BLM needs to assure the health of residents by securing reductions in emissions from existing leases (and preventing future violations) before permitting new leases.
1077	The Jonah Field has already negatively impacted ….. people. Any expansion will only further this damage. People are also being affected by the monstrous field.
1086	I am also very concerned about the air pollution. This development should not endanger the citizens of that area. Somehow the permitting process needs to absolutely guarantee that the present pollution is reduced enough to meet all health standards and that the new drilling will never create a repeat of that pollution. Of course, this concern fits with my first concern. Longer term thinking will help.
1096	Air quality already in the Upper Green River Basin has been significantly impacted. Adding more emissions will only make the impacts greater. The health of the residents of this county and the health of the general public are important.
1097	Finally, Human Health is already an issue in Sublette County with dangerously high levels of ozone. Undoubtedly, these new wells will cause even more pollution to this once pristine valley.
1098	The high levels of ozone reported in Pinedale this winter are also of great concern. It is incomprehensible that a county with a population of 10,000 is subjected to the same air quality as cities with populations in the millions. The science documenting the debilitating and sometimes life threatening affects to the respiratory system from exposure to ground level ozone is vast and decisions must be based on this evidence.
1105	Elderly friends tell me they can't even go outside much of the time, and remain indoors sucking on oxygen tanks, and no doubt the poor kids will grow up with some serious health problems, such as are usually found the most-polluted parts of large cities.
1109	We request that BLM conduct a thorough Health Impact Assessment (HIA) during the NPL NEPA process. The World Health Organization has published rationale and common-sense guidelines on why and how to conduct a Health Impact Assessment, which are excerpted below. World Health Organization http://www.who.int/hia/about/why/en/index.html Why use HIA? HIA is based on four values. These values provide a platform from which the benefits of HIA can be derived, and link HIA to the policy environment in which HIA is being undertaken. 1. Democracy – allowing people to participate in the development and implementation of policies, programs or projects that may impact on their lives. 2. Equity – HIA assesses the distribution of impacts from a proposal on the whole population, with a particular reference to how the proposal will affect vulnerable people (in terms of age, gender, ethnic background and socio-economic status). 3. Sustainable development – that both short and long term impacts are considered, along with the obvious, and less obvious impacts. 4. Ethical use of evidence – the best available quantitative and qualitative evidence must be identified and used in the assessment. A wide variety of evidence should be collected using the best possible methods. ***Note refer to referenced WHO website for reasons to use HIA***
1116	First, please include Highway bridges and underpasses for use as wildlife crossings……. Add in the risk to humans and their vehicles and I believe this is a no-brainer.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1123	And certainly the utmost must be done to reduce ozone levels, because this pollutant presents a severe threat to the public health
1130	Work with Wyoming Department of Transportation to create over or under passes that wildlife can use to migrate safely through Highway 191, Highway 189 and Highway 351. This is an extremely important step in reducing vehicle collisions (both a human .....safety concern)
Invasive Species	
1104	Alteration of sagebrush habitat, including the spread of noxious and/or invasive species.
1104	Introduction of aquatic nuisance species.
1104	Introduction of terrestrial nuisance species.
1104	The intentional or unintentional spread of organisms from one body of water to another may be considered a violation of WGFC regulations. • When work will occur in or near water, all equipment must be decontaminated. Decontamination should first occur before arrival at a project site so AIS are not transferred from the last visited area. Decontamination should again occur before leaving a project site so A1S are not transferred to the next site. • Decontamination may consist of either: 1) Draining all water from equipment and compartments, Cleaning equipment of all mud, plants, debris, or animals, and Drying equipment for 5 days in summer (June, July & August); 18 days in Spring (March, April & May) and Fall (September, October & November); or 3 days in Winter (December, January & February) when temperatures are at or below freezing; or 2) Using a high pressure (3000 psi) hot water (140°F) pressure washer to thoroughly wash equipment and flush all compartments that may hold water.
1128	The EIS should recognize that because of its toxicity to sheep and other livestock, the spread of halogeton will significantly impact livestock forage in the Project Area and is not consistent with rangeland health objectives. Livestock can sicken and die from eating halogeton. Halogeton is invasive and will interfere with reclamation success and expand to undisturbed areas as well.
1128	There must be aggressive control of noxious weeds, especially halogeton.
1128	A project-wide weed plan should be developed that would specify actions to prevent the spread of and guide the control of noxious weeds and invasive plants.
1130	and all trucks need to be washed daily to prevent the spread of invasive species.
1130	Control invasive plant species.
Land Use	
1067	Any temporary or permanent changes in land use need to be disclosed.
1128	There should also be a column reflecting federal / state/ private land ratio.
Livestock Grazing	
1050	My first question is regarding wildlife. How will ranchers be affected by this proposal since the rigs are near grazing cattle? Sage grouse are becoming extinct due to the oil and gas boom and oil companies are changing where they are drilling in order to stop their extinction. However, are the ranchers being considered in this proposal and if so how will their livestock and land rights being protected. When the environmental impact statement is written I hope you consider the ranchers.....

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1053	Will you be making others move their animals off the BLM leases and they will have to pay for other land somewhere else.
1067	The BLM should address how range improvements and lessee allotments will be affected by the proposed project. In summary, the Sublette County Commission wants to ensure that the impacts to permittees are completely documented…….
1067	Our goal is to protect and maintain agricultural operations so as to maintain a diversity of businesses, especially agriculture during the lifetime of development and production of energy resources. We want to ensure that when the energy play is expired, that we continue to have a healthy and vibrant agricultural base.
1104	Discovered water could also be developed, where appropriate and applicable, to improve livestock distribution.
1116	First, please include Highway bridges and underpasses for use as wildlife crossings…….. Livestock growers would probably appreciate them as well.
1122	Please help the rancher and farmer. Please have more grazing land to help the farmer and rancher.
1127	Mitigation of impacts to vegetation and livestock grazing must be identified by PFO staff. Encana developed a list of mitigation measures under the prior Environmental Assessment. These agreed upon mitigation measures must be included in this EIS as part of a "tool box" to reduce impacts to rangelands and grazing operations.
1127	Grazing on public lands is a vital economic value to agricultural producers and to local communities. PFO must include impacts on this economic activity in the analysis. We urge PFO officials coordinate with the University Of Wyoming - College Of Agriculture, Department of Agriculture and Applied Economics, who conducted several studies showing how federal policies impact agriculture and communities throughout the state. The studies include the importance of Animal Unit Months, the significance of input and output of state agriculture, and the costs and revenues to counties of agriculture compared to development. Changes affecting the continuation of livestock grazing and other agricultural operations within the planning area and the economic impacts upon agriculture must be included in the analysis.
1127	We urge the PFO to base its decisions on science, long-term monitoring data and real data collected in the field. Permittees possess irreplaceable long-term, on-the-ground knowledge that should be utilized. Livestock grazing is a resource management tool currently used to achieve desired environmental objectives in the project area, including obtaining positive effects upon food and habitat for wildlife and livestock. The EIS must include (1) the positive effects livestock grazing has upon the environment. For example, using livestock to improve elk forage (Anderson and Scherzinger 1975l), bird habitat (Derner et al. 20093), and other natural resource objectives (Davies et at 19904, Severson 19905), and (2) how livestock grazing assists in achieving environmental objectives and objectives set forth in the Resource Management Plan, such as how livestock grazing can decrease excessive litter accumulation and thus increase plant diversity and species richness (Manier and Hobbs 20076). Producers are particularly aware of how impacts will affect rangeland health, habitat and forage. They understand it is in their best interest to continue to serve as stewards of rangelands in the project area and can offer recommendations which are both environmentally and economically sound.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1128	As mitigation for temporary loss of AUMs, Operators should agree to support vegetation and forage enhancement to improve range productivity.
1128	To the extent that oil and gas operations will prevent realization of management objectives, BLM must recognize that natural gas development is a primary causal factor in the allotment not meeting or maintaining the Wyoming Standards for Healthy Rangelands. Operators must agree to be responsible for corrective actions. BLM cannot reduce grazing permits or impose other onerous penalties on livestock operators, if gas field operations result in the allotment failing meet or maintain rangeland health.
1128	Operators should also agree to coordinate hauling with affected livestock grazing permittees and landowners, to reduce livestock collisions. Operators should further agree to compensate livestock operators for livestock fatalities at replacement cost, as opposed to market cost.
1128	Operators should agree to support vegetation and forage enhancement to improve range productivity and to provide forage replacement for areas where grazing is reduced or removed.
1128	Irrigation of hay meadows are critical to the continued ranching in the project area. This should be allowed to continue. If meadows are developed, the Operators should provide replacement meadows.
1128	In addition, livestock crossing signs should be placed in the area to make sure the drivers are aware that the area is open range and that they are in active grazing allotments. Speeds should be reduced to a level appropriate for travel within grazing allotments.
1128	The proposed action will directly affect some grazing allotments in the core drilling areas. The EIS needs to address the direct impacts on these operations and well as on the other allotments that will be affected to a lesser extent.
1128	The livestock grazing discussion should also identify stock driveways used to move sheep and cattle through the Project Area and in the vicinity of the Project Area. It also needs to identify other critical areas, such as sources of water, calving / lambing areas (if applicable), and planned range improvement projects that may be affected adversely.
1128	The EIS's impact discussion should also disclose and mitigate well pad, pipeline, and road construction, which removes vegetation on sites where permittees and BLM cooperated on vegetation projects which were already implemented to improve forage. Other work may interfere with or compromise livestock water projects and springs.
Mitigation	
1013	There should NOT be any funding per well to set up any structure similar to the JIO or PAPO office. There is about $300,000 a year going to salaries in PAPO to administer the program that would be better spent on PETs and NRSs to process APDs and conduct compliance inspections on the ground than to try to dream up ways to spend money that, in all probability, will not actually mitigate impacts to the flora, fauna, air and water in the area.
1013	It is the operator's job to pay for mitigation and the BLM's job to monitor the project regardless of slush funds with a layer of bureaucracy between the decision makers and the public heavily populated by operators with their own self interests at heart.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1021	I have been associated with many oil & gas related projects throughout the Rocky Mountain region and can attest to the dedicated stewardship which has been shown by those associated with this particular project. I have witnessed many conversations during project meetings associated to the Mesa, Anticline, Boulder, Riverside, Warbonnet and Jonah Fields with these developers where direction was given solely on the intent of protecting our wildlife and environment. Many times, this direction was up and above what was required and/or included off-site mitigation to improve wildlife habitat. The industry has spent numerous dollars in mitigation and protection of our environment.
1026	The proposed development utilizes best practices such as minimal regional gathering facilities, electrification, extensive directional drilling, natural gas fired drilling rigs, flare less completions and emission controls on facilities. Encana has a 10 year history in the Jonah field of following through on commitments and piloting new technologies that could have a future impact. The Operator Committed Practices Advisory Council has been established to suggest further mitigations or technologies.
1041	Development of course needs to be done in a prudent manner to protect the environment and quality of life of the state. I have personally witnessed the stewardship of the environment and wildlife by those associated with this NPL project. In almost every instance, they have gone over and above what is expected of them. They have continually sought new cleaner and nonintrusive methods and technologies to protect the environment. With those that were used, some have worked well and some have not; however the drive to seek better solutions is continually sought.
1067	Construction Mitigation Measures The following mitigation measures should be considered due to the air quality concerns in the area: ▪ Use of electric drill rigs where electric service will be available. ▪ Use of natural gas drill rigs with emissions no higher than the highest currently available EPA off-road engine Tier Level (Tier 2, 3, or 4) depending on engine size and date of the drilling. ▪ Use of off-road diesel equipment (dozers, loaders, graders, cranes, etc.) that meet the highest currently available EPA off-road engine Tier Level (Tier 3 or 4) at their time of use. ▪ Determination of and required use of the most effective fugitive dust controls for roads and other disturbed areas that will not be paved during construction. For example, the use of magnesium chloride, which does not maintain its soil binding properties when relative humidity is low, is extremely suspect in arid climates. ▪ The feasibility of improving primary travel routes, including identification and development of shorter travel routes and paving primary access roads to reduce air quality impacts. ▪ Site reclamation requirements should include appropriate biological reclamation (replanting) to naturally and permanently reduce wind erosion fugitive dust emissions to natural levels. ▪ Limiting drilling activities to the same maximum levels analyzed in the EIS (rigs operating per/day and wells per/year).

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1067	Operation Mitigation Measures The following operation mitigation measures, where not required by air quality permits, should be considered: In addition to the measures listed below, the BLM should work closely with the WDEQ and county to determine what mitigation measures they will require for regulatory compliance. ▪ A thorough Leak Detection and Repair (LDAR) program should be required to minimize fugitive VOC emissions from piping components. ▪ Use of electric well re-work rigs where electric service will be available. ▪ Use of natural gas well re-work rigs with emissions no higher than the highest currently available EPA off-road engine Tier Level (Tier 2, 3, or 4) depending on engine size and date of the re-work drilling. ▪ Determination of and required use of the most effective fugitive dust controls for roads and other disturbed areas that will not be paved during operation. ▪ Require emissions reduction for any existing high-emitting Encana facilities in the area to offset the projects emissions. Specifically, existing Encana facilities should be retrofit to current Best Available Control Technology standards. ▪ The requirement of other emission reductions (offsets) or the creation of a fund by the operator to create emission reductions, such as to fund retrofit/replacement of high emitting farming or municipal equipment in the county. ▪ Seasonal production/VOC emission limits or mitigation during the high ozone season.
1067	If the impacts analysis indicates that mitigations are needed, grazing mitigations should be consistent with those stated for oil and gas operations in the Resource Management Plan and Environmental Impact Statement for the Pinedale Office. ..and that any measures needed to mitigate ranch and grazing related impacts are fully implemented. Should energy resources in the field be expanded, we expect that these mitigations and any new ones necessary to protect permittees will be brought forward through any in-fill development.
1067	In particular, please include a mitigation regarding compensation by the operator if reduced allotment numbers occur due to project activities.
1067	In general, we prefer that mitigation, including such measures as seasonal operating periods, disturbance buffers, and regular and continuous monitoring, be employed as the primary method for protecting species and habitats. We prefer that more restrictive measures such as No Surface Occupancy (NSO) and/or withdrawal of leases be used as a tactic only when all other measures prove ineffectual.
1067	When severe adverse effects to wildlife and associated habitats cannot be avoided, we support the assessment of funds from lessees to be invested in Term Limit Habitat Contract accounts. Monies collected could be used for off-site mitigation, monitoring, and habitat restoration programs. We expect the amount of such funds be commensurate to the economic value of the resource(s) lost.
1067	Further, the Sublette County Commission request that any off-site mitigation be done at the county-level and not invested elsewhere.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1067	Lastly, when the need for off-site mitigation is identified, we do not advocate the purchase of private property to be used for wildlife habitat. Rather, we espouse mitigation measures that can be applied on private lands (for willing participants) that allow landowners to remain on-site, with the land remaining in the agricultural tax base, and with no loss of long-term landowner management sovereignty. Such mitigation measures could include purchase of standing grass, buy-down of herds, purchases of hay, water developments, or conservation easements that might preclude subdivision.
1067	If potential impacts are identified during analysis, please request funding from the lessees to conduct research-level monitoring to ensure that wintering mule deer (Berger et al. 2006; Sawyer et al. 2003; Sawyer et al. 2004; Sawyer et al. 2005; Sawyer et al. 2006b; Sawyer et al. 2007), pronghorn (Berger et al. 2006), and nesting greater sage-grouse (Naugle et al. 2006) respond to drilling disturbance (or lack thereof) as expected, based on past research.
1069	We hope Encana will support the return of bison to public lands as an environmental mitigation opportunity. Bison are a missing and critical ingredient to healthy sagebrush ecosystems. By helping return bison, Encana could be a leader in promoting win-win solution.
1083	Should you decide that there is some rationale for going forward with this outsized project, despite your legal obligations under NHPA, we would insist that a substantial investment, adequate to protect equally large historic landscapes, would be the only appropriate mitigation. In the past, projects in the Pinedale Anticline and Jonah Field have made substantial investments in wildlife mitigation while mitigation for the irreparable harm to historic and cultural resources have been minimal at best. While the recent purchase of the lands for the New Fork Historic Park was an elegant solution to damage done to the historic Lander Road, the actual investment by the operators was still relatively minimal in comparison to what has been devoted to protecting wildlife habitat. Should this project go forward, the BLM must insist on a very substantial mitigation fund under NHPA sufficient to protect other historic landscapes so that the general public will have the opportunity to enjoy their historic legacy of open spaces in other locations. Anything less than this would be an abdication of your legal responsibilities under numerous federal laws.
1083	In addition, should this enormous project be allowed to proceed, we believe that intensive, special training for heavy equipment operators will be required. It is especially important that the field operators understand their obligations to respect and avoid historic and cultural resources under both NHPA and the Archaeological Resources Protection Act (ARPA).Together, these provisions from NHPA and ARPA make it clear that contractors working on any federal undertaking that may encounter cultural resources need to receive in-depth training regarding the significance of those resources and the contractor's responsibilities under the law. These are requirements that we believe the BLM has a special obligation to oversee and that special training would be required.
1087	Furthermore, I do believe that industry should provide mitigation funds not only for impacts on wildlife and other natural resources, but for socio-economic impacts as well. These types of impacts include increased demand on community services, particularly healthcare.
1091	Establish actual, concrete steps for mitigation that will occur immediately when a trigger is hit. Don't use a general 1, 2, 3 step process that allows for wide open interpretation and no set deadline.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1091	Do not establish another interagency project office. Actual monitoring and mitigation can be conducted by the BLM in cooperation with other agencies without housing another office. If Encana wants to donate money for monitoring and mitigation, have the money fund BLM positions dedicated to the NPL. Or Encana can commit to a certain dollar amount each year and hire contractors to do special projects as determined by the BLM or other agencies.
1098	Mitigation measures need to be taken to limit methane released into the atmosphere from drilling, completion and production, as well as from wellheads and pipelines into the atmosphere. Mitigation measures must also been taken to decrease exhaust pollution from engines installed on well pads or used in the drilling, completion and production processes, including fracturing and well servicing.
1099	The WQD supports the recent BLM/USGS document "Regional Framework for Water Resources Monitoring Related to Energy Exploration and Development" (Framework). This guidance document provides a 7 step framework for developing a monitoring strategy for measuring and mitigating water resource damage. The framework should be specifically referenced in the EIS and the monitoring framework should be followed to develop a monitoring plan for both surface and groundwater prior to any development. Additionally, baseline monitoring data should be collected early in the planning process to help guide development and any necessary mitigation.
1102	How mitigation and compensation for impacts will be managed and how funding to implement this mitigation will be secured.
1104	The potential for habitat improvements to mitigate habitat losses in and adjacent to oil and gas developments should be cooperatively developed between agencies. We strongly support efforts to develop off-site habitat mitigation plans to replace non-recoverable wildlife habitat.
1104	We recommend development-impact monitoring plans be developed for affected species including pronghorn, sage-grouse, and appropriate non-game. We recommend WGFD personnel be involved in the development and future oversight of these plans.
1109	To the greatest extent possible, we urge the BLM to abide by the CEQ mitigation hierarchy for all wildlife species that are likely to be impacted by NPL development, which includes 1) avoiding crucial wildlife habitats, 2) minimizing operational impacts and 3) mitigating the remaining impacts from oil and gas development. We request that BLM implement a 4-step process to assess compensatory mitigation acreage, which includes: 1) discuss operator's objectives for the wildlife mitigation plan, identify crucial wildlife habitats, and delineate the area of operations, 2) analyze spatial data using Geographical Information Systems (GIS) to calculate direct and indirect impact compensatory mitigation acreage, 3) negotiate with the operator to reduce the impacts through avoidance and minimization measures (BMPs), and 4) resolve remaining mitigation needs through negotiations with the operator on mutually agreeable compensatory mitigation projects. Please refer to the attached draft document entitled, "Compensatory Mitigation Guidelines" from the Association of Fish and Wildlife Agencies for more detailed information. We request that BLM read and utilize these recommendations from experienced, professional biologists.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1109	[Document attached to email]COMPENSATORY MITIGATION GUIDELINES To address oil and gas development impacts on wildlife resources. August 2010. "These compensatory mitigation guidelines were prepared with the intent of recognizing and resolving wildlife impacts that result from oil and gas development. These guidelines were developed mostly to address oil and gas impact issues in the western states. The principles and framework contained within this document are applicable to other regions and industrial operations, based on regional research and findings."
1110	Looking at the proposed amount of energy development within the Wyoming High Desert District specifically within the Pinedale Field Office leads me to believe that the proposed NPL development must build into its plan the opportunity for offsite mitigation to occur.
1110	Energy development in Wyoming needs to provide the opportunity for the energy industry to mitigate for their impacts through planned mitigation banking methods. By not planning for mitigation, or establishing areas for mitigation dollars to be spent, Wyoming is denying the energy industry the right to balance their impacts with investments in our natural landscape resources.
1110	The mitigation projects at Cottonwood Ranch in Big Piney have been a celebrated example of successful off site mitigation for oil and gas impacts. The foundation of that investment was that there was low energy potential in that area while having high wildlife values. Cottonwood Ranch operations have participated in a multitude of partnerships and projects with the Jonah Interagency Office resulting in the protection of critical habitat. It encouraged the business practices that have expanded the health of riparian zones, and increased the rangeland health of the upland areas. These results have been monitored and are quantifiable values and increases. In reflection, Cottonwood Ranch projects are exemplary of Mitigation Banking for energy development in the arid rangeland environments of Wyoming.
1110	We can provide the space and time for Mitigation Banking by identifying the overlapping layers of high wildlife valued areas with low to medium potential energy. It is these areas that need restricted energy development for the duration of the RMP while other developments continue or occur. By limiting development and leasing in areas that are of low value for energy development in the short term, but high in wildlife values for the long term, adds the protections necessary for mitigation investments to have confidence. By identifying and creating these pockets within RMP areas we are also encouraging landowner and allotment permittee to benefit through the conservation of agriculture. Mitigation Banking is a structure and definition that is needed for the energy industry to have confidence investing capital into long-term projects with measurable results. Mitigation Banking is how we can balance Wyoming values with the energy needs of our country.
1121	Design a mitigation and monitoring plan that is tailored to address the actual impacts at the site, such as projects that increase forage used by livestock, wild horses, and wildlife to mitigate forage temporarily lost to development;
1121	The mitigation plan needs to be specifically tailored to address the identified impact. For instance, if crucial winter range is developed, then crucial winter range within the project area should be identified. Similarly, if development removes livestock forage, the mitigation should increase forage within the project area, rather than supporting an effort outside of the project area.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1121	Mitigation also needs to address the significant impacts on the demand for services from the affected communities. As mentioned above, this may include waivers on seasonal restrictions to allow for a year-round rather than seasonal or temporary work force. This and similar measures should be explored to develop a permanent work force that includes families and helps to build communities.
1121	Off-site or compensatory mitigation needs to follow BLM direction closely. IM 2005-69. To date the project description would not support off-site mitigation. Lincoln County generally opposes mitigation that includes private land purchases. Such acquisitions remove land from the tax base and remove a viable ranch that is an important part of the local community and economy.
1127	In addition, Encana has been working closely with livestock grazing permittees to develop voluntary mitigation measures in the form of livestock water developments. The PFO must work closely with permittees and Encana in developing these additional measures.
1128	BLM needs to document the mitigation measures and the basis that these measures will be sufficient to reduce any impacts to insignificance. An environmental assessment (EA) or EIS must have a reasonably thorough discussion of the effectiveness of mitigation measures. National Wildlife Federation, et al., 150 IBLA 385, 396 (1999). In addition to the issues identified in the scoping notice and discussed below, the EIS will need to address other mitigation measures and explain the basis for recommending them.
1128	On-Site Mitigation Preferred to Off-Site Mitigation Off-site compensatory mitigation is voluntary and adopted only if BLM has determined that mitigation measures and onsite compensatory mitigation measures are not sufficient. BLM IM 2008-024 at 1 ("[O]ffsite mitigation may be used only when the BLM can demonstrate that the proposed mitigation is reasonably necessary to accomplish an authorized BLM purpose. When proposed offsite mitigation is geographically distant from the project area, and particularly when it occurs on non-Federal land, the connection to resources for which the BLM is responsible should be clear.)
1128	The local governments support exploration of opportunities for onsite compensatory mitigation before going to offsite mitigation. Opportunities for onsite mitigation should be exhausted before off-site mitigation is considered and adopted.
1128	Onsite or mitigation actions, such as improvement of wildlife habitat, will provide alternative habitat to wildlife as they are immediately displaced by pad construction drilling. There is a role for offsite mitigation but BLM should not be ignoring the opportunities onsite.
1128	The local cooperators oppose both land purchases and easement acquisitions as mitigation due to the adverse impacts on the agriculture sector as well as the local tax base. CLG also opposes the acquisition of livestock grazing preference or grazing permits that will also remove livestock grazing and viable ranch operations from the public lands. One alternative is to compensate ranchers for their management on private lands that benefits wildlife and protects wildlife habitat.
1128	The 2008 EA mitigation measures were limited to the purchase of agriculture lands or interests in the land without considering the adverse impacts on the counties' tax base, the loss of agriculture operations, and the long-term impacts to the communities. Each of the local governments land use plans and policies include the preservation of agriculture. Land acquisition mitigation that only considers eliminating the current land uses and diminishing the property tax base for the counties contradicts the plans and policies and does not directly compensate for the project's impacts.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1128	Compensatory mitigation should also be coordinated with the local governments, because the development of replacement resources will directly affect land uses on and off public lands. Any off-site compensatory mitigation should not result in the loss of private land or interests within the affected counties. It should not be limited to impacts on wildlife habitat or wildlife. BLM guidelines also provide that such proposals must be analyzed in the NEPA process to identify what are being mitigating and the type of projects.
1128	Mitigation should also include close coordination with local governments. These steps are required by the BLM cultural resources policies, H-8140-1.
1128	Vegetation enhancement and vegetation projects should be part of the on-site and off-site mitigation. There is a backlog of such projects awaiting funding and approval.
1129	The EIS should include a Mitigation Plan similar to the revised Wildlife Mitigation and Threshold Plan developed for the Pinedale Anticline.
1130	Develop a mitigation plan that includes the proponent's ability to fund wildlife studies and contribute to a wildlife mitigation fund.
1130	Develop action plans for monitoring, addressing thresholds, and mitigation.
1130	· Define specific mitigations measures that the BLM will use to limit and prevent impacts to the hydrological systems.
1131	In addition. it is important that the NEPA analysis identify all relevant and reasonable mitigation measures to protect important water resources, even if they are outside of the jurisdiction of the BLM. Mitigation measures (e.g.. back flow preventers, adequate cementing and casing, pit lining) must be developed and implemented for this project to protect surface and ground water zones.
1131	Identify specific mitigation requirements and BMPs applicable to the operator for all phases and actions involved in drilling and production.
NEPA Process	
1026	….and encourage timely analysis of potential impacts of the development for the final decision on the EIS.
1026	Alternatives should be framed broadly, rather than specific technologies, so that it is possible to incorporate new solutions as they become known.
1027	It would be my desire to communicate how important it is for the quick and appropriate approval of development of the proposed NPL area of the Jonah field as it means so much to the State of Wyoming as well as the many people who call this area their home. I would respectfully request that your full support and attention be paid this very critical project of development and its approval be expedited as every stage of consideration.
1033	The project should be fast tracked to avoid any potential loss of skilled labor and to provide much needed revenue for our state.
1037	When I review all of these concerns, I am left wondering how the BLM will be able to authorize this additional gas field in the Upper Green River Valley. My recommendation would be to pursue a "No action" alternative with respect to this project. It is my understanding that a lot of gas is still coming out of Jonah and the Pinedale Anticline. The gas in this proposed field is not going anywhere. A "No action" alternative would allow Pinedale BLM to help the gas companies pursue a staged development approach to gas development in the Upper Green.
1064	The park also suggests that limits…on timing and development be considered in the development of the full range of alternatives.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1065	We encourage the BLM to complete the required analysis for the Normally Pressured Lance EIS as soon as possible.
1067	Given the level of energy development in the planning area and the associated environmental concerns, it is imperative that potential effects from project activities be analyzed in detail and disclosed in the Environmental Impact Statement (EIS). A thorough understanding of key issues will allow decision makers to properly address and mitigate potential impacts. In this memorandum, we provide input on issues and alternatives that should be considered during project development and addressed in the EIS. Our goal is to ensure that the best available science is fully analyzed, evaluated, and incorporated into the environmental document. If so desired, we will gladly provide BLM decision-makers clarification on comments deemed unclear or incomplete.
1067	The BLM should consider all comments from the public, and should strive to incorporate those comments from Sublette County residents. Please communicate in writing the details of the public participation plan, including how public comments will be considered, how feedback will be provided, and how the public will be able to participate in the process after scoping is over.
1067	Budgets for all baseline data studies should be included in the EIS.
1090	While oil and gas independence are important, we need to balance this with the impacts to area residents, national parks, and wildlife. It seems that these impacts have not really been taken seriously as more development is allowed in this area.
1091	Establish baselines and how to measure changes, start monitoring and plan for adjustments before permitting this project. The Pinedale Anticline still doesn't have a final groundwater monitoring plan and the baseline for mule deer is a joke. Please complete these kinds of steps - not just for water and wildlife but for air, etc. - before approving the project so that the public knows what it is dealing with and what will be done.
1091	If you use adaptive management, define it according to how it will actually be implemented. Don't let it be an ambiguous catch-phrase.
1091	Be realistic about how development actually happens. The Pinedale Anticline Record of Decision's "once on a pad, stay on a pad" is only applicable in certain situations. Define terms and expectations explicitly. The BLM's interpretation of certain development steps is different than the operators. Figure out what EXACTLY will be allowed when and how and make sure the agencies and Encana are on the same page.
1091	Ambiguous phrases in the Record of Decision such as "as soon as possible" and "in consultation with" should be avoided. Deadlines should be set and the role of cooperating agencies clearly defined. If they are consulting, what exactly are they consulting on and how? What result is expected from them, how and when? From the entire consultation?
1091	Record of Decision should be spare in language and direct in idea. Use bullet points, tables, charts, etc. rather than text that is open to interpretation.
1091	The BLM is ultimately responsible for what happens in the NPL; it should only use cooperating agencies as consultants and advisors, which is the requirement and intent of NEPA, rather than allowing them to dictate terms and conditions.
1092	In order to successfully develop these resources, BLM must establish reasonable alternatives that will enable environmentally-sound development of energy resources in the project area.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1093	Sierra Club agrees with the BLM that a landscape-scale management approach is absolutely necessary when evaluating proposed development projects, and we submit the following comments and concerns in response to the proposed Normally Pressured Lance Natural Gas Development Project (NPL Project) from that perspective.
1094	I want to encourage the BLM to adhere to a tight timeline relative to its EIS and review of EnCana's proposed NPL gas field.
1095	The EIS should include a broad range of reasonable alternatives, including the following: 1. Capping the density of surface well sites at one well site per square mile. Directional drilling is in widespread use in the Upper Green River Valley, and Questar is drilling more than 50 wells directionally from a single well pad. There is no excuse for the BLM to allow well surface densities greater than one pad per square mile, given the capabilities of the technology. It is true that in the Jonah Field, initial drilling results indicated that 13% of directional wells experienced some type of difficulty in drilling, and largely as a result of remediating these problems well costs were 10% higher for directional wells than for vertical wells. This is a small premium for oil and gas operators to pay to achieve something that more closely approaches multiple use in the context of full-field oil and gas development. Since EnCana is prepared to drill at this surface density in Core Area portions of the Project Area, why not set the bar at this level for the entire project? 2. Displacing surface disturbance from sensitive wildlife habitats. Sensitive wildlife habitats such as big game crucial ranges and sage grouse nesting habitats should be avoided; the gas and oil resources underneath them will still be available for production via the use of directional drilling. 3. Requiring green completions. Needless waste of natural gas through venting and flaring can be avoided by requiring green completions, thereby reducing air pollution and greenhouse gas production. 4. Require piping of condensate and central collection facilities rather than well site condensate tanks. This reduces truck traffic associated with trucking the condensate (thereby reducing to some degree disturbance to wildlife), and also reduces emissions of VOCs from condensate tanks. 5. Require well telemetry and reduce well site visits for the purpose of well tripping. The reduction of truck traffic would further reduce disturbance to wildlife and dust pollution. 6. Require closed-loop drilling in lieu of reserve pits. This reduces the size of individual well pads and thereby reduces the overall surface disturbance of the project.
1102	Recent Council on Environmental Quality guidelines regarding how mitigation must be implemented if a Finding of No Significant Impact is based on mitigation.
1102	Guidelines on how categorical exclusions are to be used in a tiered NEPA process.
1104	We recommend the development of an alternative in the EIS that avoids gas development and activities within all big game (pronghorn) crucial winter habitat, sage-grouse winter concentration areas, supports core area sage-grouse, and complies with existing habitat protection stipulation periods associated with sage-grouse leks and nesting habitat as a baseline for determining impacts.
1107	In the NPL Project EIS, BLM must consider the Operators' objectives of developing and maximizing recovery of hydrocarbon resources underlying federal, state, and private-fee mineral leases within the NPL Project Area when identifying the purpose and need of the Project.
1107	Furthermore, BLM should only analyze alternatives that meet the Operators' purpose and need for the NPL Project. BLM may not analyze alternatives that are inconsistent with the objective of developing hydrocarbon resources within the NPL Project Area.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1107	When developing alternatives in the NPL Project EIS, BLM must only analyze reasonable alternatives. Alternatives that would render development within the NPL Project Area uneconomic or infeasible are not reasonable. BLM should not analyze alternatives with overly stringent restrictions or conditions of approval that would render development uneconomic. BLM should also recognize that the application of certain technologies may not be feasible throughout the NPL Project Area.
1107	Furthermore, BLM may only analyze alternatives that are consistent with existing lease rights. An oil and gas lease is a contract between the federal government and the lessee, and BLM must recognize that once it issues a lease, it cannot preclude development or impose additional lease stipulations.
1107	Finally, BLM may not analyze the alternative of not approving development as a "no action" alternative. Under a "no action" alternative, BLM must analyze continuation of the status quo. Therefore, BLM should analyze the development that could proceed under the current management of the NPL Project Area if BLM did not approve the Operators' NPL Project proposal.
1107	Finally, the BLM must continue to authorize oil and gas development within the NPL Project Area, subject to requisite NEPA analysis. NEPA does not prohibit BLM from authorizing individual wells during its preparation of the NPL Project EIS.
1119	The Rockies have been on the losing end of shale development. Natural gas companies are moving out of the Rockies and shifting their development to the more profitable and less bureaucratic shale plays like the Marcellus and the Haynesville. In order to keep companies operating and developing in the Rockies, we must ensure they have access to the reserves and regulatory approval is granted in a reasonable amount of time. I encourage the BLM to adhere to their schedule in relation to the EIS process and...
1119	..ensure a thorough and comprehensive EIS.
1120	We know that majority of pollutants come from Duffy units - when will that be addressed?
1120	P.S. Why was the public only given 10 days to respond to this scoping meeting???
1121	Any proposal or action taken that may result in restrictions on reasonable and economical access to resources shall be opposed by the County. We ask that there be no arbitrary restrictions on development activities. Any seasonal restrictions, closures, or spatial buffers should be scientifically based and show a demonstrated and documented need. We believe that any restrictions should provide for waivers, modifications or exceptions.
1123	The Pinedale Resource Management Plan (RMP) indicates that this area is designated a Traditional Leasing Area. RMP Record of Decision (ROD) at Map 2-9. A number of sage-grouse leks occur in this area. RMP ROD Map 2-36. Other information we have received indicates that something like 1000 sage-grouse inhabit the area. Under the terms of the ROD, management provisions for sage-grouse in Traditional Leasing Areas are specified. RMP ROD at 2-46. These must be adhered to in the record of decision for the NPL Project. The same is true of big game resources. See id. at 2-48 (providing for big game mitigation measures).

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1123	Moreover, in our view it would be inappropriate to approve this project prior to finalization of the sage-grouse RMP amendments that are being prepared. These amendments may well establish new requirements for sage-grouse conservation, and the BLM should ensure these new provisions are fully abided by as the NPL Project is pursued. As will be discussed in the next section of these comments with respect to BLM's duty to minimize the environmental impacts of oil and gas development, there is no doubt BLM has authority and indeed an obligation to put these measures in place as conditions for this development proceeding, even if they are not currently part of the stipulations in the applicable leases.
1123	6. The Gold Book. And finally, while it is not a regulation, BLM's Gold Book also makes it clear that environmental impacts must be minimized. Under the Gold Book, the BLM must minimize undesirable impacts to the environment, the long term health and productivity of the land must be assured, and BLM and the operator must minimize long-term disruption of the surface resources and uses and promote successful reclamation. Gold Book at 2, 15. While the objective is to maximize oil and gas recovery, this is to be done "with minimum adverse effect on ... other natural resources, and environmental quality." Id. at 37. Design and construction techniques should "minimize surface disturbance and the associated effects of proposed operations and maintain the reclamation potential of the site." Jd at 15. And under regulatory provisions, operators "shall comply" not only with statutory and regulatory provisions, but also must comply with "other orders and instructions of the authorized officer." 43 C.F.R. § 3162.1(a). The Gold Book is nothing if not standing instructions and orders from the BLM, and accordingly its provisions are binding and must be complied with. As can be seen, there are a host of BLM regulations and other authorities that require the agency to "minimize" the adverse environmental impacts of oil and gas development, and others that require it to "protect" natural resources and environmental quality. These are substantive obligations that the agency must adhere to as it moves to approve the NPL Project. The obligation to minimize impacts lies relative to the ozone problem and Class I area visibility mentioned above, as well as issues related to sage grouse and big game conservation, which were also mentioned above.
1123	B. The Meaning of the Word "Minimize." The word minimize means "[t]o reduce to the smallest possible amount, extent, size, or degree." THE AMERICAN HERITAGE DICTIONARY OF THE ENGLISH LANGUAGE 1119 (4TH ed.). Obviously this is a strong standard. And it is not an analytical or procedural requirement-it is not just a mandate to comply with the National Environmental Policy Act (NEPA). It is an additional substantive obligation-in order to meet the obligation to minimize impacts established by its regulations, the BLM must reduce adverse environmental impacts "to the smallest possible ... degree." This substantive standard is not necessarily met by engaging in NEPA analysis, actual measures to minimize adverse impacts to the environment must be put in place.
1123	Accordingly, it is appropriate to apply the ordinary meaning of minimize relative to what is required to protect resources in the NPL Project area. And certainly even if a modified meaning were used it cannot be a change of such magnitude that the word is effectively nullified or read out of the regulations. The obligation to minimize adverse impacts must be given real meaning.
1125	To prevent this economic loss, it is critical that the BLM expedite its Environmental Impact Statement so that a Record of Decision can be issued in a timely manner. Again, Sweetwater County would like to thank the BLM for the opportunity to comment on the NPL Project and to express importance of the BLM expediting the issuance of a Record of Decision.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1125	Sweetwater County Comprehensive Plan Goals: Sweetwater County believes the NPL Project can be accomplished in manner that balances resource development with environmental protection. The Sweetwater County Comprehensive Plan - 2002 goals that support this balance call for the County to: • Encourage and support environmentally responsible resource exploration/development with the region. • Encourage/support proactive County participation in relevant public land and resource planning and decision-making processes"; • "Encourage a balance between resource development and environmental protection." • -'Evaluate natural Resource development proposals (and the associated land uses) for their effects on air, water and environmental quality." • "Encourage industrial development near available facilities, services and resources." It is in this spirit that Sweetwater County offers the following comments regarding the proposed NPL Project
1125	Protection of Natural Features and Resources: The Sweetwater County Comprehensive Plan 2002 calls for Sweetwater County to: "Recognize and protect the County's unique cultural, recreational, environmental and historic resources" and "Consider the region's limited water resources as a part of County land use and development decisions"
1127	The WDA recommends the NEPA analysis include the socio and economic importance of livestock grazing and ranching on the local economy, as well as the protection of open space and wildlife habitats as referenced in Ranching in the Rockies, Threats and Signs of Hope (Yarbrough et at. 20061).
1128	The EIS must examine other alternatives, including BLM commitment to candidate conservation agreement and special management actions on public lands within and adjacent to the project area.
1128	BLM can tier from or incorporate by reference the analysis done in another environmental impact statement (EIS) or EA, when that analysis applies, such as to similar actions and similar effects. BLM NEPA Handbook H-1790-1 at 25-27. The EIS should incorporate by reference the analysis that it used in the Jonah Infill Development Project (Jonah) FEIS, (2006), Pinedale RMP FEIS (2008), and the Pinedale Anticline Supplemental EIS (2008).
1128	When BLM relies on other NEPA documents, it must specifically incorporate them by reference. 50 C.F.R. §1500.4(j). Biodiversity Conservation Alliance, 171 IBLA 218, 227 (2007). In Biodiversity Conservation Alliance, the Board held that an EIS complied with NEPA for approval of 120 wells in a coaled gas project in Wyoming. Id. at 229. The Board found that BLM properly used the tiered EIS approach to incorporate by reference previous environmental analysis and fully addressed the cumulative impacts. See also Biodiversity Conservation Alliance, 169 IBLA 321, 331 (2006), citing Friends of the Nestucca, 144 IBLA 341, 358 (1998).

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1128	Section 102(2)(E) of NEPA requires BLM to consider, in an EA, "appropriate alternatives" to the proposed action, as well as their environmental consequences. 42 U.S.C. §4332(2)(E) (2000); see 40 C.F.R. §§1501.2(c) and 1508.9(b); City of Aurora v. Hunt, 749 F.2d 1457, 1466 (10th Cir. 1984); Bales Ranch, Inc., 151 IBLA 353, 363 (2000). Such alternatives should include reasonable alternatives to the proposed action, which will accomplish its intended purpose, are technically and economically feasible, and yet have a lesser or no impact. 40 C.F.R. §1500.2(e); Bales Ranch, Inc., 151 IBLA at 363, and cases cited therein. Consideration of alternatives ensures that the decision maker "has before him and takes into proper account all possible approaches to a particular project." Calvert Cliffs' Coordinating Committee, Inc. v. U.S. Atomic Energy Commission, 449 F.2d 1109, 1114 (D.C. Cir. 1971).
1128	The EIS may need to analyze an alternative drilling plan with less environmental impact. Any preferred alternative, if it differs from the proposed action, must meet the operators' needs as well.
1128	The alternatives to be developed need to conform to the Purpose and Need or the proposed action in this case. In particular, any alternatives need to be technically feasible, avoid wasting the natural gas resource, and maximize revenue to the United States. Thus, 'postponing' some lease development, which would reduce revenues or threaten natural gas recovery, would not be meet the Purpose and Need of the proposed action.
1128	CLG commented on the 2008 Normally Pressurized Lance Environmental Assessment (EA) and incorporate by reference those comments.
1129	All development plans and activities must adhere to the Pinedale BLM Final Resource Management Plan (RMP)/Record of Decision (ROD) of November 2008. This includes all mitigation guidelines which are outlined in Appendix 3 of the ROD.
1130	Because the NPL overlaps both the Pinedale RMP and the Rock Springs RMP, the BLM needs to identify which RMP will guide activity, disturbance, reclamation, mitigation, and monitoring.
1131	In accordance with EPA's responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, we are providing scoping comments to inform BLM of issues that EPA believes to be significant and warrant explicit treatment during the NEPA process. In providing these comments, it is our goal to have these issues addressed in the Draft EIS.
1131	Recent events have led EPA to become acutely aware of the spill risks inherent in oil and gas development operations. To this end, it is important the NEPA analysis address reasonably foreseeable impacts from low probability catastrophic spills and spill prevention measures that are in place to prevent these impacts. Implementation or a Spill Prevention, Control and Countermeasures Plan (SpeCp) will reduce the potential for direct and indirect impacts to sensitive resources from spills or accidental releases of hazardous substances. EPA believes that it is critical that all spceps are appropriately designed given local geology and the level of risk associated with local conditions. We recommend that BLM describe in the Draft EIS how a site specific SPCCP will address low probability catastrophic spills.
1132	The extent of development will in part depend on the content of the EIS and Record of Decision (ROD) and future permit decisions, including any environmental restrictions or limitations imposed by the BLM for operations proposed on BLM-administered lands.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1132	In the NPL Project EIS, BLM must expressly recognize that the State of Wyoming, and not the BLM, has authority for regulating air quality within the NPL Project Area. The complex regulatory scheme established by the Clean Air Act (CAA) provides the State of Wyoming with the authority to regulate Wyoming's air resources. BLM may not infringe upon the State's authority by attempting to regulate air quality or air emissions in the NPL Project EIS.
1132	The NPL Project ElS currently has a timeline for completion that estimates a ROD will be issued in the Spring of2013. Encana strongly encourages the BLM to ensure that this time line is met.
Oil and Gas Operations	
1006	Let's make sure we recycle our products, pipe, chemical plastic bottles, oils.
1010	How can you authorize 3500 more wells now? They should complete the 500+ in the Jonah that are already permitted, prove they can do a better job, then start this new project.
1013	Are the plans to directionally drill 1/4 miles from four pads per section?
1013	The scoping states that spacing will be 10 acres. You are planning on 40 acre spacing with the number of wells proposed over 140,000 acres.
1013	If you are planning on using Quantum Leap technology you are to be commended.
1013	The Lance formation in the Jonah field is spaced at 5 acres. What is different about the porosity of the same formation that 10 acre spacing will actually drain the formation? It appears that 40 acres will lead to 10 acres then to 5 acres. This will lead to 15,000 wells vs. 3500 wells in the field. If that is the case we need to plan up front for 5 acre spacing.
1013	I recommend drilling directionally up to 1/2 mile and use one 60-72 acre pad vs. four 18 acre pads. This will cut down on the road and pipeline infrastructure needs. Roads can be placed down every other section and leave a 3/4 mile buffer between pads without roads or pipelines thus providing wildlife a place to be with less disruption to their lives.
1016	Encana is a leader in environmental compliance and application of multiple development impact reduction strategies.
1016	Encana is an industry leader in application of cutting-edge air emission reductions technologies, including: natural gas powered rigs, flare-less completions technologies, and many production related emission reduction technologies.
1017	They are a leader in environmental compliance and application of multiple development impact reduction strategies with their cutting edge air emissions reductions technologies, such as the natural gas fired drilling rigs.
1021	I have worked side by side with many of these individuals who regard these areas as their own back yard and intend to go the extra mile to maintain its beauty as they produce a resource which we all enjoy and utilize. The development of pipeline gathering systems and multiple well pad locations have minimized traffic and air pollutants. Much of the existing infrastructure such as access roads, gathering pipelines and central delivery points exist and can be utilized for the proposed NPL project.
1024	In addition, we believe the development strategy proposed by Encana, which includes directional drilling, a three-phase gathering system, and low surface disturbance demonstrates a commitment to environmental stewardship and will provide a clean, domestic energy source.
1029	I am asking the BLM please require a maximum of one well pad per square mile throughout the entire area, not just in sage grouse Core Areas.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1029	Phased development should be required, with no more than 25,000 acres committed to full field development at any one time. · Allow new acreage to be opened for drilling ***only*** after final reclamation of a similar acreage of well field.
1033	The use of low emission natural gas drilling rigs and flare fewer completions are examples of their commitment to keep impacts to a minimum.
1033	As there becomes more natural gas diesel alternatives for trucking sub contractors there should be a push to reduce diesel pollution by using natural gas powered trucks for as much as possible.
1042	Knowing that the expected levels of oil are not for sure yet, I don't believe that they should just jump into building all these wells.
1053	The last concern about this land is, will you be fencing, will you put limits on the rigs by fencing, and how much money will it cost?
1054	And how are they going to transport the water that the wells needs are they going to use pipe lines?
1055	I have been impressed with this company's efforts to mitigate damage to the surface area and their efforts to drill as many wells from one pad as they can. I am also pleased with their internal efforts to control spills and discharges.
1058	We also request that an alternative be fully analyzed that limits surface disturbance to 1 pad per 4 sections. With the proposed well depths it is well within current technology to fully extract the gas with this offset distance. This helps to deal with the surface disturbance related issues.
1065	Given its proximity to the Jonah Field, the Normally Pressured Lance Area provides significant energy resources in an area close to existing energy infrastructure.
1067	As the county has limited gravel sources, please disclose gravel sources and amount planned for use for the period of the project.
1067	Methods to control garbage disposed of along county and state roads created from material hauled to and from project
1067	Sublette County Commissioners request that backflow prevention mechanisms are installed on all well heads.
1068	Please require a maximum surface density of one well pad per square mile throughout the entire project, not just in sage grouse Core Areas.
1068	Finally, phased development should be required for this project, under which no more than 25,000 acres should be committed to full-field development at any one time, and new acreage can only be opened up for drilling after final reclamation of a similar acreage of well field.
1077	One well pad per square mile throughout the entire project.
1077	The BLM should provide a corridor at least two miles wide without any drilling or road construction allowed along the Grand Teton pronghorn herd migration route.
1077	Phased development should be required with no more than 25,000 acres committed to full-field development at any one time, and new acreage can only be made available after final reclamation of a similar acreage or well field.
1079	And no more than 25,000 acres should go to full field development without a similar acreage of reclamation imposed.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1082	EnCana is proposing to use directional drilling to cluster wells on one well pad per square mile in sage grouse Core Areas and four well pads per mile elsewhere, and to use natural-gas-powered directional drilling rigs to cut down on air pollution, which the company refused to consider for the Jonah Field. These measures are better late than never, but wildlife and fisheries could still suffer major impacts if the project does not include additional safeguards.
1086	Do so many wells need to be put on line so quickly.
1087	With that said, I also believe that industry must do its part to follow all rules, regulations, and best practices as gas and oil reserves are developed in Sublette County.
1088	Using the drilling pad will make a smaller foot print by using each pad for four wells.
1088	The smaller number of collection sites will keep traffic to a minimum throughout the NPL. This will cause less stress upon all the animals in the area and help keep dust down.
1091	Require that Encana require subcontractors, etc. adhere to best management practices and be held to the same regulations, requirements, spill reporting, etc. that Encana will be. And prove it. This is especially important for drivers who speed or run over wildlife. At posted speed limits in the fields, no wildlife should be getting hit. NO littering! There should be consequences!
1091	Use oak mats for well pads to reduce impacts to vegetation and wildlife.
1091	Make Encana justify future locations of well pads now. Even though much of this is determined by the success of wells, Encana should know the general development schedule and locations. Review future road arteries and try to plan so that one road can service many wells pads rather than making new ones for every well pad. Isn't it better to have one winding road from pad to pad rather than several main roads with a spider web of secondary access roads?
1091	The NPL should be remote monitored and facilities (dehydrators, compressors, tanks, etc.) should be co-located to reduce or eliminate human disturbance. Use LGS!
1091	Solar and/or wind power should be used field-wide as much as feasible. Not what is cheapest but what is possible and has the best overall benefits! Reduce overhead powerlines.
1091	NO YEAR-ROUND DRILLING!!!
1092	Timely approval of the EIS and associated ROD will allow Encana to smoothly transition equipment and workers from the Jonah Field to the nearby NPL Field. Because of the fields' geographic proximity, Encana can lessen impacts to local communities by building upon existing Jonah infrastructure and technologies.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1094	The importance of business continuity between EnCana's operations in the Jonah Field and the proposed NPL Field cannot be emphasized enough. If EnCana does not have all of the needed regulatory approvals completed when its developmental drilling program in the Jonah Field is completed, then the economic case for developing the NPL Field could be severely diminished. This is due to the following factors: The current gas price at the Opal Hub is less than $4.00 / mcf. At this price level every cost associated with developing a gas field must be managed very efficiently in order for the return on investment to justify the various risks associated with the project. My understanding is that the expected recoverable reserves per well in the NPL Field are good, but not great. This factor also underscores the importance of EnCana being able to seamlessly move people and equipment from the Jonah Field to the NPL Field. Any disruption due to factors such as a longer than anticipated regulatory approval process will add to costs, diminish the return on investment, and could result in jobs and tax revenue being lost to Sublette and Sweetwater Counties. And of course an important piece of the value creation puzzle is for EnCana to be able to seamlessly move its operation from the Jonah Field to the proposed NPL Field.
1094	I believe the following plans will result in a positive result for the project from an environmental perspective: The characteristics of the NPL Field will allow for directional drilling techniques. This will minimize the impact on wildlife habitats and surface disturbance. An active monitoring system using state of the art technology to determine any gas leaks (from valves etc.) will minimize the impact of any leaks, and ensure an effective maintenance program is in place. The three-phase gas gathering system envisioned for the NPL Field should be an effective strategy for managing the potential emissions from the NPL Field. I feel the financial strength of EnCana is a strength relative their ability to operate in an environmentally responsible manner. They are a public company with a history of strong financial performance. EnCana not only possesses the technical expertise to manage environmental risks, but they possess the access to various forms of capital to be able to finance the implementation of a responsible program.
1095	Given the cumulative level of expansion of gas drilling in this area, we recommend that a system of phased development be instituted, in which new lands are not opened to drilling until existing impacted areas have at least completed final (not interim) reclamation. Leases involved in projects such as the NPL project could be suspended so that the Operator(s) would not have to pay lease rentals during the pendency of the delay.
1095	For the NPL project, no more than 25,000 acres should be committed to full-field development at any one time. New acres could be opened for development as a comparable acreage of previously produced lands reach the stage of final reclamation.
1095	We are also pleased to see that EnCana intends to do its directional drilling with natural gas powered drilling rigs, so that directional drilling can be accomplished without significant elevation of pollutant levels. This could have been done in the Jonah Field as well, but at the time of that project's approval, the BLM never considered directional drilling paired with gas-powered drilling rigs, and indeed used the higher emissions of conventional drilling rigs as the excuse not to require directional drilling for that project, citing air quality concerns. We are pleased to see that the BLM is now taking a smarter approach to its permitting of oil and gas projects, at least on this count.
1096	Please require a maximum surface density of one well pad per square mile throughout the entire project, not just in sage grouse Core Areas.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1096	Phased development should be required for this project, under which no more than 25,000 acres should be committed to full-field development at any one time, and new acreage can only be opened up for drilling after final reclamation of a similar acreage of well field.
1096	What is the current pipeline capacity?
1098	Phased development should be required for this project. No more than 25,000 acres should be committed to full-field development at any one time, and new acreage can only be opened up for drilling after final reclamation of a similar acreage of well field.
1098	Prior to the Jonah and Pinedale Anticline development I spent occasional days in that area watching sage grouse during their mating season, marveling at the number of antelope or feeling the sting of wind driven sleet. The crush of wind often drowned out the crunch of sage or gravel underfoot, making conversation impossible. The last time I stood in that same place, there were no less than 10 wells within several hundred yards, the ground was scraped clean, UPS trucks and water tankers rushed by, the wind howled but the only sound was the drone of gas wells, drill rigs and traffic.
1103	[Document attached to email] Natural Gas Compressor Engine Survey and Engine NOx Emissions at Gas Production Facilities. August 31, 2005. "The objective of this study was to collect the technical information required by the Texas Commission on Environmental Quality (TCEQ) to estimate the distribution of compressor engines associated with natural gas wells in the eastern portion of Texas. This study is the first TCEQ effort to conduct a detailed survey of small compressor engines in this region; currently, there are no TCEQ rules or programs that inventory small compressor engines. The study area included 110 counties bisected by, and east of, Texas Interstate Highways 35 and 37 (IH-35 & 37)."
1103	Coriolis metering can reduce many errors, reduce onsite support service requirements, increase transparency of measurement (and the confidence of citizens that resources are being produced fairly), reduce waste by accurate measurements, and reduce the need for calibration services. While these meters are not suitable for all services, some effort should be made to encourage adoption of the most accurate, reliable, safe, and secure metering possible for various applications. Due to satellite communications, WiMAX, WiFi, and other communication advancements, virtually all areas can now have near real-time reporting, which will allow errors to be discovered sooner, resulting in less waste and minimize expensive legal procedures.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1103	Please consider waste reduction through efficient use of resources to be essential. Combined Heat and Power (CHP) is capable of generating significant electrical energy from the heat of compression, and other production related processes. CHP adoption has suffered in Wyoming due to: 1. Regulatory silos that separate oil & gas production and transportation from electric power production, transmission, and distribution. 2. Regulatory capture that harnesses the power of regulators for the benefit of those that are supposed to be regulated. 3. Regulatory arbitrage that results in costs being shifted to taxpayers, ratepayers, or other unwary entities, for the benefit of powerful vested interests. 4. The lack of interconnection standards to allow connection to electric utility lines. 5. The tendency of high value resource producers to continue to focus on production volume based on existing equipment and traditional methods, instead of considering new technologies for better results. While there is something to be said for recycling equipment, it has often been shown that more strict regulation to reduce waste results in process savings, such as the increased profitability of chemical plants after cheap injection disposal methods were discouraged. 6. CHP adoption would reduce ambient noise around production facilities by encouraging the enclosure of engine powered skids used for production. If the heat energy is captured, the enclosures will not be cooled by using large fans to exhaust the heat, allowing closed circuit cooling to capture energy for other purposes (including, but not limited to production of electrical power). 7. Increasing the transparency of the reporting process would help improve faith in the fairness of the process. For example: When documents are scanned into computer systems an ASCII (or other standardized information content (i.e. XML format) for public monitoring / accountability) must be part of the file. Public access to files that require manual searching to find relevant information is a form of regulatory arbitrage that reduces faith in the process. Please require sufficient information in machine readable
1103	The nature of resource development requires periodic adjustments, and the recent history of the Jonah Field has shown that the process generally involves producers requesting more liberal rules for increasing production and reducing costs. Please see attached testimony by Montana Dakota Utilities before the North Dakota Public Utilities Commission on the benefits they have realized from their CHP project at the Glen Ullin, ND natural gas compression station.
1103	[Document attached to email] MONTANA-DAKOTA UTILITIES CO., A Division of MDU Resources Group, Inc., Before the Public Service Commission of North Dakota Case No. PU-10- Direct Testimony of Darcy J. Neigum
1103	Our system of government requires that checks and balances must be defined, measured, and enforced to be both fair and effective. To achieve this result Normally Pressured Lance Project development should be guided by phased implementation plans so that progress can be assessed, and necessary changes made with adequate input from all parties.
1104	We support the proponent's suggested use of directional drilling technology to minimize the number of well pads.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1104	We support the proponent's effort to minimize the production and storage of waste. Reserve pits should be lined with plastic (or another non-porous material) to prevent surface or ground water contamination from seepage, fenced to exclude mammals, and covered with one to two-inch woven mesh material to minimize bird entrapment. Alternatively, plastic or fiberglass tanks should be used to hold drilling fluids.
1104	It is generally preferable for pipelines to follow existing utility corridors to the extent possible.
1104	The concerns with transporting AIS with hydrostatic test water can be avoided by using a potable water supply. Potable water, if used for hydrostatic testing, can be moved between watersheds without concern for transporting AIS. The discharge of potable water should be accomplished in a manner that does not increase erosion or alter stream channels. Discharge should occur into temporary sedimentation basins and the dewatering of temporary sedimentation basins should then be done in a manner that precludes erosion.
1106	a maximum surface density of one well pad per square mile throughout the entire project, and not just in sage grouse Core Areas. (Note that this is technically feasible given all the directional drilling technology we now have.)
1106	phased development whereby a limited number of acres is committed to full-field development at any one time, with new acreage being opened up for drilling after final reclamation of a similar acreage of well field, and
1107	Continued natural gas development in the NPL Project Area will allow development to proceed more smoothly if BLM approves the project because rigs and labor will already be available in the NPL Project Area. Timely approval of the NPL EIS will offer a smooth transition from Jonah for the operator. This project will build upon the existing Jonah infrastructure and technologies.
1109	We believe that many problems in the Upper Green, including ozone exceedances, wildlife declines and groundwater contamination could have been avoided had a more moderate pace of development been planned and required by BLM. It is within BLM's authority to require this, especially to prevent further threats to human health from high ozone levels and Toxic Air Contaminants. This not only makes sense to protect and preserve all natural resources that BLM is required under FLPMA to consider during the NEPA process, but also because the U.S. now has more natural gas in reserve than at any previous time in history. There is simply more gas in storage than is needed by consumers. Additionally, the State of Wyoming does not have the pipeline capacity to allow it to receive the higher prices for its gas than other states, and so more gas produced immediately results in fewer royalties to the state in the long-term than waiting for additional, future pipeline capacity. The gas will still be there when prices are higher, and our community's respiratory health will benefit with a slower pace. We therefore request that BLM limit the number of spuds allowed within a single year to protect human health, wildlife and groundwater.
1109	The map of the NPL project area available at the BLM website is not accurate, and includes sections that are not presently held by oil and gas leases (see T29 N., R.109 W). We request that this map should be corrected and a new map published at the BLM website.
1113	Maximum surface density of one well pad per square mile.
1113	Require phased development. Maximum of 25,000 acres under development at any one time. New acreage opened to drilling only after final reclamation of a similar acreage of well field.
1114	Encana is a leader in environmental compliance and application of multiple development impact reduction strategies.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1118	With the directional drilling technology, low emission natural gas drilling rigs and flare less completions, Encana continues its progressive approach of good industrial citizenship.
1120	I also noticed part of the project overlaps sage grouse designated core areas. How will this affect industry procedures - unknown.
1120	I am against winter drilling and believe the BLM needs to slow things down and plan for phased development.
1121	We believe that the location of well pads, road access and pipelines should be designed to reduce impacts on wildlife and fisheries, groundwater resources and sensitive areas. We believe it is technically feasible to permit appropriate access to mineral and energy resources while protecting other resources from irreparable harm.
1123	There are many means by which the obligation to minimize adverse impacts can be met. Two of the most significant would be to require the use of directional drilling and to mandate a phased approach (temporally or spatially) to development. The Federal Register notice for the NPL Project indicates that a number of measures will be used to reduce impacts, and we appreciate that. See 76 Fed. Reg. 20,370, 20,371 (April 12, 2011). This includes the use of directional drilling. But in moving forward on this project BLM must reconsider whether it has done the absolute most to reduce impacts, as the minimization standard requires.
1123	Moreover, the BLM should fully consider requiring a phased approach to development in this area. In the Encana slide show, slide 43 indicates that Encana may contemplate a three-phased approach.8 This three tiered approach could be a means to minimize the impacts of this project. In particular, the first "concentric ring" that is portrayed in the slide might be drilled from the existing Jonah field using directional drilling, which could reduce impacts. And in all cases, development of the next phase should not be permitted until reclamation has been successful in an earlier phase area. Many other means might be available to minimize adverse impacts, and BLM should consider the full range of these options prior to permitting this project, especially relative to controlling ozone pollution, protecting visibility, conserving sage-grouse, and protecting big game habitat and migration corridors.
1123	As discussed, efforts to minimize impacts such as we have suggested would not be inconsistent with lease rights that have been granted. Putting in place requirements for the use of directional drilling from fewer well pads, the use of centralized liquid gathering facilities, and the use of remote well monitoring telemetry, for example, are not inconsistent with any lease rights and would help meet BLM's obligation to minimize environmental impacts due to oil and gas operations.
1125	Once this Record of Decision is issued, the NPL Project Area will be scheduled to become the base of operations for those oil and gas rigs projected to leave the Jonah Field.
1126	Take note of these Encana Measures: Conversion of diesel rig engines to natural gas: Selective catalytic oxidation emission controls: Flare-less flow back green well completion; Gas, water and condensate will be collected in closed-loop systems;
1129	Closed-loop piping systems must be mandatory in the project design, including piping condensates, water, gas production, and waste.
Out of Scope	
1001	I fully support the (NPL) project and hope it grows and thrives.
1003	Encana is one of these companies that care about the environment. Most of their employees are from WY and are sportsmen so they have a vested interest for jobs and their way of life.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1004	I am in full support of the NPL Project and development.
1005	I would like to express my opinion in favor of the continued safe development of oil and gas resources. My experience with Encana has shown me that they are one of the most responsible companies there is with safe, clean, environmentally sound energy development.
1005	..and they are good neighbors in the community.
1006	We need gas. But we don't need a bad rap about getting the gas. If we practice all the things we talk about, i.e., safety, courteous actions, environment concerns, we can achieve the goal.
1007	I have worked in the oil and gas field for about 3 years now. As everybody knows Encana is the largest natural gas producer in Wyoming. They are very good at what they do. They will always look at the impact on the community and land and environmental issues.
1007	I'm sure they will input any regulation that the BLM or any other organization has. There will always be different concerns and issues. They always keep the community informed on all the issues. They do have the best interest in the community. And the land they will be drilling on.
1008	I am supportive of Encana NPL project.
1008	My relationship with Encana has been supplying needs to the oil field. I truly believe that Encana has a second to none commitment to being a good steward of our precious Wyoming landscape.
1010	Having worked in the gas field - mostly in flow back (flow test) I have spent hundreds of days on Encana locations. Problems I have seen:
1010	P.S. You need to prove you can do a better job too. Current grade F-. Yep.
1014	I oppose allowing this contamination and toxic pollution to happen in Sublette county Wyoming…….shut down this permit and deny it.
1015	I am writing this in strong favor of EnCana's NPL project!
1016	NPL development would provide a continued secure supply of domestic energy to Wyoming and the U.S.A.
1017	I would like to offer my public comment on the NPL proposal and impending EIS. As an 11 year resident, husband, father of five children, my family and I have had a pleasurable experience living and working in Sublette county.
1017	I see that the NPL development would provide a continued secure supply of domestic energy to Wyoming and the U.S.A., helping reduce the feeling of being held hostage by foreign countries' natural resources.
1017	I think that some overlook what commodities the oil and gas industry provides in our everyday lives, products that everyone uses, day to day, even though others slam the industry.
1017	Thanks for your time and consideration of approval for this development.
1019	I fully support the NPL program, …..
1020	I support the Wyoming NPL natural gas project.
1021	I do appreciate the opportunity to provide comments in support of the proposed NPL project.
1021	I enjoy being in the outdoors camping, hunting, fishing and exploring our great state. I am proud of what we have accomplished in regards to the development of our natural resources and to have been able to be a part of the planning process. I appreciate your time and the opportunity to provide comments in support of the proposed NPL project, a project which the entire state of Wyoming will benefit from for years to come.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1022	Overall, the project have many positive impacts and the negative impacts are being addressed and minimized to help keep a positive appeal of the industry of gas exploration.
1023	I am in favor of the NPL EIS for the following reasons:
1023	I feel that Encana has proven themselves to be responsible corporate citizens of our Southwest Wyoming communities, through their environmental programs and civic contributions. I would prefer to allow Encana the opportunity to develop this area instead of allowing a new or different operator to come in which may or may not be as good a corporate citizen as Encana.
1024	Sublette County School District #1 supports the NPL project.
1025	A steady supply of natural gas is needed for our country.
1026	I write in support of the NPL development project…….
1026	Natural gas development is critical for our country's energy independence……As American's, we enjoy a high quality of life, but also demand a high level of energy. Our lands are abundant in natural gas and we have the governmental regulations to insure that it is done environmentally responsibly, making it imperative that our energy is sourced locally.
1027	I have seen firsthand how far the energy industry has come since my first involvement in early 1980 up until this time, I have no doubt that development of the proposed NPL area of Jonah will be conducted with the utmost respect and consideration for the natural resources and habitat that is so critical for the enjoyment of live in this area.
1028	I believe that Wyoming needs to be a leader in natural resource production to help this country to lower its dependency on foreign resources.
1029	Many people in Green River, Rock Springs and across Southwestern Wyoming are deeply concerned regarding the potential impact to the land, wildlife, air, and water that we so deeply cherish. My wife and I moved from the Southeast to Wyoming to work in drilling sector of the energy market and later began a career with Sweetwater County government. Clearly, I appreciate the critically important work performed by men and women who earn a living in the "oil and gas patch". However, as a hunter, fisherman, hiker, and supporter of the conservation movement; I have grave concerns for the future of the area north of Green River, Wyoming and south of the Jonah Fields. I am referring to EnCana's Normally Pressured Lance Project, which, I believe, will have a devastating effect on wildlife, public use of the land, water quality, and clean air across the entire Upper Green River Valley.
1029	I am asking that the BLM; in order to strike a balance between the demands or the oil & gas industry ***and the stewardship required to protect our public lands for coming generations***; give, at least equal weight to the needs of wildlife, public land use, and air & water quality.
1030	As a citizen of Wyoming, and one who works within the Environmental, Health and Safety field, I would like to share my thoughts and concerns regarding the proposed NPL Natural Gas Development project. I can state with certainty that the natural gas company for which I work for makes every effort to keep the environment clean within the area we operate in.
1030	I understand environmental stewardship. It is a part of my every day job. I know people desire a healthy environment, with clean water, air and land. I desire those things as well.
1031	I support the Wyoming NPL natural gas project
1032	I just wanted to show up in support of continued Natural Gas Exploration and production.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1032	It has become obvious that new and greater natural gas deposits can and should be a pivotal answer to many of the nation's questions about our future energy needs. We are much closer to a more complete superstructure to support the free flow of natural gas than we will be for solar or wind power for quite some time.
1032	However, dump the EPA for a sensible alternative and this country could take care of all these issues in a matter of MONTHS and not years.
1033	Wyoming is fortunate to be able to help the United States to be more energy independent.
1034	Do not permit any more gas development in the Green River Valley. Quit drilling and allowing them to wreck out land for the profits of stockholders.
1035	My family owns a ranch in Boulder that my great-grandfather purchased over 100 yrs. ago. At first, most residents were happy with the gas companies, which brought money and jobs to a hard scrabble, mostly ranching community. Sublette county is no longer the “last of the big frontier”, and this drilling is irreversible. But once the Fed makes up its’ mind there is little anyone can do but yell and scream in vain. If you haven’t guessed by now I am opposed to any more drilling the NPL wants to do. The gas and oil will be gone eventually, but our environment will never rebound back to what It was, uniquely majestic.
1035	However, in the last ten years I have seen nothing but an absolute RAPE of the land and its air quality!
1040	I believe that the proposed Naturally Pressured Lance (NPL) natural gas field is a great idea. Natural gas is a great transition phase between the oil industry into other possible alternative energies.
1040	Right now, the natural gas industry is just starting out, so it would be wise to research how much natural gas will be used. It would be awful if the NPL went through, and natural gas was not in high demand.
1041	I truly appreciate the opportunity to submit my comments that are in support of the proposed NPL project near the Jonah Field. On behalf of our firm, I whole-heartedly support the NPL project.
1042	To conclude my argument, I believe that this proposal would be a good addition to the drilling that has already taken place, but only if the amount of wells is lowered and the wells are a lot cleaner than the previous wells.
1043	As far as the Normally Pressured Lands project goes I think that they should just be able to drill. Other than that, drill baby drill.
1044	The proposal of the NPL is a good one in my opinion.
1045	I think this proposal is a good one. All in all I think this is a very good idea, and that this proposal should become real.
1046	I think the proposal for the NPL project is a good idea. Even with all those things I still think it is a good idea to put all those wells out there and keep drilling.
1047	I do not disagree with allowing the development of the new wells, but these issues need to be taken care of. This is why the NPL proposal should be approved,…..
1048	I support the Wyoming NPL natural gas project.
1048	Domestic energy (not purchased from our enemies) Jobs for Americans Taxes for our state and country EnCana’s commitment to our environment We need more of these types of projects for US developed clean energy.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1049	I as a student of Pinedale High support your work, but I am concerned about the NPL project put forth by Encana.
1049	I think there is a lot of ways for our evolution in the oil and gas industries maybe there is a better way of bringing oil and gas to revolutionize that will help with the environment and proceed to the future.
1050	Although I am in full support of the NPL project I have a few questions and concerns.
1051	I work in the oil & gas industry. I personally feel it is vital to Southwestern Wyoming's economy that the NPL Natural Gas Development Project gets approved. This should be an easy decision for Wyoming to make.
1052	All in all I feel that the NPL can be very beneficial to the state but as of right now I feel a slight feeling of apprehension and fear for the beautiful state of Wyoming.
1054	.. and I want to know if EnCana is going to work with some organizations that care and protect the environment?
1055	I have reviewed Encana's proposed NPL development project and would like to state that I support their efforts and would hope that permits would be issued to allow them to proceed in this endeavor.
1056	I am a farmer in Eden, WY. I strongly support Natural Gas development in our side of the state. As a gentleman said to me at a gas station in Rock Springs, on May 6th, "is it always this way.?" My reply was: " Yep, that's why God gave us Natural Gas. Everything is below ground here. Why not develop it?" When he got in his car, he nodded and said, "I had no idea." That's right. They have no idea how mile after mile is sagebrush, grass and hills. Let's develop the gas. There is no plant, animal, or bird, that cannot, will not or are not able to adapt to gas development. Please. Let's. Use. Natural Gas.
1057	I am a resident of Rock Springs, Wyo. I make my living in the Jonah field. I see firsthand what Encana does to keep the environment safe. I personally have to follow the protection measures every day. I spend many hours a year being trained in the procedures to keep the environment safe. I know this sounds like company line propaganda but it is still a documented fact. I have been in the Jonah field in one capacity or another for 9 years. I have worked all around the US and offshore for the past 31 years. I have seen the industry grow towards the safer, cleaner, and much more environmentally aware group. Mostly in the past 10 years when the Jonah EIS was processed. I can say that it forever changed the way we do business. Encana is totally committed to the responsible extraction of natural gas from Wyoming and when the NPL EIS is approved they will continue to be the friend to the environment and good steward to the land and people.
1057	To finish I would like to be counted as a complete supporter of the Encana NPL project.
1058	We specifically incorporate by reference the comments submitted by Wyoming Outdoor Council, in case we cannot get to further input prior to the deadline.
1059	I am a resident of Rock Springs, Wyo. my husband makes our living in the Jonah field. Encana is totally committed to the responsible extraction of natural gas from Wyoming and when the NPL EIS is approved they will continue to be the friend to the environment and good to the people directly related.....
1061	It is my humble opinion that this proposed development by Encana is a positive thing.
1063	At some point we need to wake up, before it's too late and address the idea of cleaner and less intrusive forms of energy.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1065	Devon Energy Production Company ("Devon") has reviewed the Bureau of Land Management's ("BLM") Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Normally Pressured Lance Natural Gas Development Project in Sublette County, Wyoming. 76 Fed. Reg. 20370 (April 12, 2011). Devon owns and operates federal oil and gas leases in the Jonah Field and lands contained within the Normally Pressured Lance EIS boundary. I would like to thank the Bureau of Land Management for the opportunity to submit scoping comments regarding this important project.
1065	Given continued geopolitical instability, the need for reliable, domestic sources of clean burning natural gas continues to grow.
1065	Please place Devon (Randy Bolles 20 North Broadway, Oklahoma City, OK 73102-8260 and Dru Bower-Moore PO Box 166, Worland WY 82401) on the mailing list for all future information regarding the Normally Pressured Lands EIS,
1065	and please provide our office a copy of the draft EIS, final EIS, and Record of Decision for this project. Please do not hesitate to contact me if you need any additional information.
1067	The Sublette County Commissioners support the development of oil and gas extraction in the Normally Pressured Lance formation. There are numerous financial benefits afforded by these activities, and we are very interested in maintaining a mutually beneficial working relationship with the BLM and energy operators.
1068	I've seen the Jonah Field and the rest of Sublette County energy development and am appalled at the havoc wreaked on the land, air and wildlife of this world class exquisite environment. I believe a moratorium on further development should be declared!
1068	Oil and gas development has taken a front seat for far too long while putting the ABSOLUTE NEEDS of wildlife and the preservation of important view sheds, water quality and clean air have been relegated to the trunk in the Upper Green River Valley. It's time for the BLM to REQUIRE and truly SEEK a sense of balance in its multiple-use management of our public lands.
1069	We appreciate that Encana has made positive assurances to reduce impacts by employing the latest technology.
1069	Encana could also help improve Wyoming's air quality by assisting with the rural refuse burn issue. Helping rural and other outlying areas dispose of solid waste will reduce emissions and pollutants.
1070	I firmly believe EnCana Oil & Gas, Inc. should be allowed to go ahead with the NPL project. Please support EnCana and the NPL Project.
1070	I have traveled to the Jonah Field often and I have never been a witness to a company so dedicated to the environment and its communities. I have personally seen EnCana employees scouring sagebrush areas for litter. I have never seen another company with this type of dedication to maintaining Wyoming. When speaking of "Stewards of our land", EnCana has no equal.
1071	I am writing to ask you to support EnCana and the NPL Project.
1071	EnCana has proved to be a caregiver to our lands, wildlife, and economy.
1072	This mail is being written in order to give my full support of Encana and The Normally Pressured Lance natural gas development project.
1073	This mail is being sent in support of Encana and the Normally Pressured Lance natural gas development project.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1073	Please grant Encana the right to drill and develop this land for the benefit of the state of Wyoming.
1074	I'm writing to ask you to please protect the Upper Green River Basin from further impacts of oil and gas development. You know how heavily impacted the Jonah Field environment already is, and though the EnCana proposal has some attempts at doing things better, it still sounds like a disaster for wildlife, air quality, and aesthetics. Can we please not sacrifice more irreplaceable spaces for short-term gain?
1076	This letter is to state my support of the NPL Project located in southern Sublette County.
1076	Over the past several years our firm has had the opportunity to work in the Jonah Field. I have been impressed with the past commitment in this area to protecting the public lands, the environment and our wildlife. They have a proven record of commitment to our wildlife and our environment.
1077	The Jonah Field is a nightmare! I have never seen it in person, but aerial photos are enough to elicit my opening statement. I don't think there is any reason for expansion of the Jonah Field, but I'm sure it will happen, and so the following should be required:
1077	It is time for the Bureau of Land Management to manage for the benefit of sage grouse and pronghorn and people. Why is the BLM so partial to gas, oil, and other energy industries when public land is being considered? So far, the BLM has not considered any habitat, wildlife, or people above the desires of oil and gas developers. This is not multi-use management. This is obvious partiality to big companies that ruin the land, make huge profits, and leave huge scars on Wyoming's land, air, water, and living things.
1078	We agree with all of the Biodiversity Conservation Alliances thoughts on the expansion in the Jonah Field.
1079	I'm writing about the proposed expansion of the Jonas Gas field. I have visited the area and seen the industrialization of these lands with their negative impacts on many wildlife species, polluted air, and not to mention scarring the landscape with well pads, roads, and so on. These are all valuable public resources being compromised by gas and oil development of these public lands.
1080	At this time, I don't think it is appropriate to issue permits for such a massive project until these issues are fully addressed and dealt with.
1081	Project will result in less dependence on foreign energy sources. Resources in domestic market need to be developed and grow.
1081	Federal lands should be multiple use areas. Projects of this nature are one facet of this concept.
1082	This project is the first indication that the "tight gas sandstone" formations in this area are not confined to the up folded bedrock of the Pinedale Anticline or the lands trapped between the faults of the Jonah Field, but instead are widespread throughout the Upper Green River Valley. This means that drilling will not be confined to the lands already moonscaped by drilling, but instead can be expected to spread throughout the basin on lands already under lease, which make up 92% of available lands in the Pinedale Field Office.
1082	Tell the BLM that protecting the Upper Green's wildlife, air, and water quality need to be major priorities!
1084	The exploration and production of natural gas is very important to this area and our country. I believe the more that we can production this country, the less we will be dependent on foreign countries for the fuel we consume.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1085	I write to you in strong opposition to the proposed Normal Pressure Lance Project by Encana. With the compounding evidence of air and water pollution from the Pinedale Anticline and Jonah Fields, I find it disheartening to be informed of another potentially devastating project. Stop this project and tell Encana to go back and destroy Canada, leave Wyoming alone.
1085	The BLM and DEQ show a poor track record of preserving clean water and air for their residents. Some question your influence and motives to favor industry development over the publics' welfare. It is time to stop the unfair balance of land use. Secretary of Interior Ken Salazar has issued a Secretarial Order 3310 to inventory of lands that possess wild and scenic characteristics. What better time to stop and look at what has become of the beautiful Wyoming landscape. Future generations will question the decisions that have been made to inflict permanent damage to our limited resources.
1087	I am in support of the proposed development for a number of reasons.
1088	Environmentally Encana is one of the leaders in the field of compliance and application of multiple development impact reduction strategies.
1089	In my opinion, there are many beneficial aspects to the NPL Natural Gas Development Project. Some of the more important ideals, which demonstrate my full and continued support as an Encana employee and resident of one of the benefitting counties,
1089	With these changes we have so eagerly made to our operations here in the Jonah, I believe that is reason to trust and support our continued growth and expansion when have proven ourselves conscientious and responsible.
1091	Streamline what's reported, how and to whom by Encana. There's a lot of redundant information and requirements for operators. Establish systems/protocols for reporting before the reports are due, possibly before the Record of Decision is even signed.
1092	Western Energy Alliance strongly supports the timely development and approval of an EIS and associated Record of Decision (ROD) that provides for the full development of natural gas and oil resources in the NPL project area.
1092	Encana Oil and Gas (USA) recognizes that many factors will have to be addressed in order to successfully explore and develop this resource and has developed a proposal that will minimize environmental impacts while providing significant benefits to local communities, the state, and the nation.
1092	Environmentally responsible development of natural gas and oil resources in the NPL project area will provide significant benefits while minimizing impacts to the environment and local communities.
1093	Since 1892, Sierra Club has worked to help people enjoy, explore and protect the planet. Many Sierra Club members, both here in Wyoming as well as from across the country, are inspired by and treasure the beauty and largely undeveloped nature of the Wyoming high desert, and we have a strong interest in fully participating in proposals for energy development on public lands in the state.
1093	We offer the following comments at this time in response to your request for scoping comments on this proposed project. We look forward to actively engaging throughout the environmental impact statement preparation process and submitting additional detailed comments in the future.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1094	The purpose of this email is to provide some comment relative to the EIS you are conducting for EnCana's proposed NPL project in Sublette County. I am employed by Rocky Mountain Bank and am responsible for our offices in Pinedale and Rock Springs. I am Chairman of the Sublette Economic Resource Council, which is the economic development group for Sublette County. Both as a resident of Sublette County and in my professional life, I am sincerely interested in helping achieve responsible and sustainable economic growth in western Wyoming.
1094	I believe EnCana has proven it is a responsible operator as it engages in the exploration and development of natural gas reserves. These prudent practices are part of the Company's culture and will be carried over to its activities in the NPL Field.
1095	We are pleased to see that EnCana is proposing to drill this project entirely using directional drilling with multiple wells on a single pad. This company dishonestly told the public and the BLM that they could not do this in the Jonah Field, even after they had drilled 160 directional wells in Jonah.
1095	Please put us on the list to receive a hardcopy of the Draft EIS when it is released. Please send it to us in hardcopy rather than on CD-ROM.
1096	we look forward to receiving future mailings, decisions, etc. regarding this project.
1096	Oil and gas development has run roughshod over other resources and values, such as wildlife, public use of the land, water quality, and clean air in the Upper Green River Valley. It's time for the BLM to require some balance in its multiple-use management of our public lands.
1097	The BLM should manage its lands for multiple use and not just for the oil and gas industry.
1097	Oil and gas development should be part of a multiple use strategy for our public lands. Unfortunately, we have seen the disastrous effects of this industry already. My renewable tourism and Sportsmen dollars will go somewhere else if the expansion of this experimental industrial site once known as Sublette County continues.
1098	I am a resident of Colorado, but was born and raised in Wyoming. My family still lives in Wyoming and one day I expect to inherit their land. My immigrant grandfather left a failed attempt at homesteading in Eastern Montana in the mid 1920's to work in the Salt Creek oil fields and Amoco refinery in Casper. My father also worked in the oil industry for Texaco and then Little America refineries as a blue collar lab technician in Casper. I worked in the maintenance department of Little America to earn money during my college years. I am well aware of the monetary benefits associated with the oil and gas industry. In the end, the oil industry provided our family the means to pursue the American dream... the hope that your children will get a solid education and have better opportunities than you did. But in the end, the oil industry did not make us wealthy. Instead, the Wyoming landscape, abundant wildlife and the experiences afforded by the access to hike, hunt, fish, explore and discover on those lands....especially those lands owned collectively by the American public... is what gave our family a sense of wealth.
1098	There has been little to no balance in the multiple use mission of the BLM from the Pinedale Field Office in recent years. Instead, the gas industry has flaunted the rules and regulations and run the show.
1098	Industry has been given every advantage for many years while other resources and the health of citizens have been compromised. It's time to return balance to the equation.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1100	I think it is very good for the people here in Wyoming to continue to tap into our natural resources. Encana does a great job trying of to preserve the environment while extracting as much gas as possible as quickly as possible. They do this so they won't be here longer than what is needed.
1100	Just think; If the Oil company's, Coal Mine's, Power plant's and all the other companies that mine for natural resources were to stop tomorrow and let it run out. Within a few months/years, the cost of importing it would be astronomical. What would that do to our economy? Basically what I'm trying to say is "Drill Baby Drill" at least until we, as nation, can come up with a better way to produce the power that we need to survive.
1101	This is a formal request to allow EnCana Natural Gas to drill the NPL region adjacent to the Jonah Field.
1101	EnCana strives to go above and beyond what is required by the governing / permitting agencies to protect the wildlife, the environment, the health and safety of persons committed to extracting the gas and other by-products from the sub surface as well as the nearby inhabitants of the land we lease / own.
1102	Funding is required for adequate fish and wildlife management. Historically, fish and wildfire programs have been underfunded or relied on funding sources other than federal monies. While funding alone will not solve the problem, it plays a critical role in our ability to balance energy development with the needs of fish and wildlife. Funding must be secure, substantial and properly allocated to make a difference. TRCP recommends that you: · Determine adequate funding for sustainable fish and wildlife management in areas proposed for energy development. · Prior to development, identify and secure appropriate funds for fish and wildlife monitoring and mitigation, including compensation if necessary or required. · Establish a long-term, dedicated “mitigation trust” to benefit fish and wildlife that is funded by royalties, rents, fines or voluntary payments. · Ensure that funds designated and intended for fish and wildlife management are not redirected to other causes. · Work cooperatively with various funding sources to leverage additional federal or state grants.
1102	The TRCP supports and promotes responsible energy development which balances land and resource values that sustain fish and wildlife populations while maintaining opportunities for hunting and fishing.
1103	Representative government, like allocating resources based on economic benefits is a balancing act that requires periodic adjustments as conditions and technology require / permit changes to be made to improve outcomes. One significant change in technology that should be implemented for future oil & gas production is a requirement for improved measurement of produced minerals and wastes. More accurate metering and verification reporting is now more cost-effective and should be required for production of public goods. Currently there is not a requirement for revenue quality metering to be used to measure the amount of fuel used per unit of production, which effectively means we do not have a means to insure that waste is minimized. Allocation metering is not fiscally responsible, as there is no liability attached to metering or application failure to measure properly. Measuring flow is inherently messy, with technical details, but continuing to ignore measurements reduces the faith of citizens that our resources are being put to beneficial use. Please see attached 2005 study done in Texas with respect to estimating NOx output from various natural gas engines, and note their lack of ability to accurately measure production on a per unit volume of consumption.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1103	The health of people and our environment are of course vital interests to the citizens of Wyoming.
1104	We offer the following preliminary recommendations as guidelines that will assist with developing the EIS for the proposed project. As the project develops and more details regarding development of the gas field become available, other recommendations may follow.
1105	Given the adverse impact to air quality, visibility, wildlife habitat, human health, and other resources BLM has the duty to protect, it is hard to believe you would recommend proceeding with the Encana Normally Pressured Lance Project.
1105	But BLM seems to have deteriorated in both integrity and commitment, to act, in Wyoming at least, as a service bureau for mining and oil companies. Given the terrible job you have done to date at managing public land, I fiercely resent the fact that my taxes are paying for your destructive mismanagement of public lands and resources.
1105	I lived in the Pinedale area from 1978 to 1999 and worked for the Pinedale Ranger District, so I know the place well. And, owing to the mess made by BLM and the corporate interests, I would not live there now.
1105	While the corporations, your chief "customers," reap huge profits and continue to corrupt Wyoming politics with their cash. You ought to be ashamed of what you have done to that place.
1106	I am a Wyomingite who has worked in the oil and gas industry. That experience has taken me abroad, which in turn enables me to understand just how unique Wyoming's open spaces and wildlife are in today's resource-pressured world.
1106	That does not mean I am opposed to well done exploration and development. As a nation we need to be good stewards of the land we have been given, balancing needs for energy with the need to honor our landscapes, maintain a healthy ecosystem that draws tourists, and to connect with the natural world for our own sanity. I urge you to very carefully address this need for balance, rather than enhancing oil and gas company profits,
1106	Stipulating that this project pay its own way in terms of producing the necessary science and studies to adequately mitigate impacts. (Federal budget constraints raise the risk of projects being done in a half-baked way that could hurt Wyoming's unique nature in the long run.)
1106	I trust the BLM will act to require balance in its multiple-use management of our public lands, given the world-class natural values that set Wyoming apart.
1107	PAW supports the NPL Project proposed by EnCana Oil & Gas (USA) Inc.
1107	With rising world demand, reliable, domestic sources of clean burning fuel are as necessary now as ever. Public lands managed by the BLM must be utilized for multiple uses, including energy development. As gas produced from traditional supply sources decline, the untapped natural gas potential on BLM lands, as well as other federal lands in the Intermountain West, must take a more prominent role in meeting the nation's energy needs.
1108	Please include me in your mailing lists of interested persons in the DEIS document.
1110	I am the owner/operator of Cottonwood Ranch in Big Piney. I am also a recently nominated member of the Wyoming RAC. Below is my comment concerning the Rock Springs RMP.
1111	[No comment was included in email.]
1112	I am a couple days late for the public comment period but wanted to say Encana is a very good company and exceeds all regulations in areas where they operate.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1112	These large companies have many other opportunities in their portfolio and as they answer to shareholders they will have no choice but to fund other projects if this one is delayed.
1113	The BLM should protect the Upper Green River Valley from some of the previous practices that damaged wildlife, public use of the land, water quality, and clean air.
1114	NPL development would provide a continued secure supply of domestic energy to Wyoming and the U.S.A.
1115	I am writing a few lines to protest the idea of Encana's plans for their gas project.
1115	Are we not going to see that we must think of future generations and what we are leaving them to contend with. Soon we will have no clear skies, good air and wild life aplenty.
1115	People involved in all these endeavors are not from Wyoming, nor have they ever been here, so they could care less for what is left after they have made their millions.
1115	I hope everyone involved will take a good hard look at what is happening -with all these "good guy" things that is predicted for our state. Please take a long hard look once and then again.
1116	I am submitting my comment both as the Founder and Director of the Bridger Wilderness Institute, L3C (BWJ) and as a citizen of Sublette County.
1116	In effect, there is a great cloud of uncertainty over the entire basin.
1117	I think it will be very good.
1117	I think it will be very good for the USA.
1117	I think Encana will take very good care of our environment, they have done very good in the Jonah Field over the past 10 years or so.
1117	The United States of America, the State of Wyoming, all the people of this great land need this gas field.
1118	As the USA tries to emerge from one of the more devastating and long lasting economic downturns seen in some while, we should not hinder but instead help companies like Encana move forward to develop the natural resources that will strengthen and help this country prosper; especially putting strong emphasis on the ones like this should be a priority. Our government agencies, federal, state and local must be cognizant of the ongoing needs for improved economic conditions and energy independence from foreign sources while maintaining the appropriate protective measures for our wildlife and habitat. Our energy companies need the support of the government agencies to maintain and continue investment within our borders.
1118	As a native Wyomingite and longtime resident, I am strongly in favor of proposals such as this one, from both an environmental perspective and from an overall economic enhancement to our tax base.
1119	I work in the Jonah Field and I support the NPL development.
1119	I believe Encana has done an excellent job in developing Jonah as they have continually strived to be an environmental steward.
1120	Please add my name to the mailing list so that I can receive information on the NPL project
1120	How much more can the wildlife, environment and people of Sublette County withstand.
1121	As County Commissioners we support the request for development.
1122	Please make the Green River Basin Wildlife Refuge on 60,000 acres.
1122	Please make the Powder River Basin State Park around Thunder Basin on 2500 acres.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1122	Please pass a Cheyenne Wyoming Wildlife Park State Park on 5,000,000 acres.
1122	Please then pass the Red Desert Park on 4 million acres of desert land to save wondrous wildlife . History too.
1122	Please tell me all you can on Wyoming about Wyoming.
1122	Please pass a bill that will say only so much oil wells, gas wells, coal mines and mines in one area and put on caps.
1124	I am writing this letter in support of Encana's proposed development of the NPL region located in Sublette and Sweetwater counties.
1124	With Encana's commitment to lowering air emissions, minimal impact on the land ,wildlife, and groundwater, it can help meet increasing demands for natural gas as a 21" century energy economy that includes low carbon fossils fuels.
1125	The Sweetwater County Board of County Commissioners (Board), would like to thank you for the opportunity to comment on the Normally Pressured Lance Natural Gas Development Project (NPL Project) and to strongly support Encana Oil and Gas (USA) Inc. (Encana) in the development of this project.
1125	Please see attached graphic. [Text refers to a "graphic" depicting economic base of Sweetwater County, no such graphic was included in comment
1125	With these goals in mind, Sweetwater County supports Encana's commitment to natural resource protection, as stated in Encana's public participation materials, especially in the following resource areas: Air Quality, Wildlife Protection, Groundwater protection, Surface disturbance and reclamation.
1126	On behalf of the Wyoming Business Alliance I am 'Writing to you today in support of the EnCana NPL Natural Gas Development Project. In conclusion, we request BLM's approval of En Cana's Normally Pressured Lance (NPL) natural gas development program
1126	The environmental benefits are equally important. EnCana is an industry leader in addressing a wide range of environmental (potential and real), concerns. Without its presence a wide range of mitigating-measures more than likely would not have occurred. Take note of these Encana measures:
1127	Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. The NPL project will affect our agriculture industry, our natural resources, and the welfare of our citizens, it's important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns. We appreciate the opportunity to comment on the scope of the EIS. We encourage continued attention to our concerns and look forward to hearing about and being involved in future proposed actions and decisions.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1129	As an organization we seek to find balanced solutions for this project that ensure fish and wildlife habitat is protected through responsible energy development. TU appreciates the opportunity to participate in the public commenting process. Background Trout Unlimited (TU) has a strong base support of hunters and anglers who depend on Wyoming's natural resources for their multi-use activities both now and in the future. Members of our organization value these public lands that sustain some of the cleanest water, the healthiest habitats and finest fishing and hunting in North America. TU is composed of more than 140,000 members and has dedicated staff and volunteers working toward the protection of sensitive ecological systems necessary to support robust native and wild trout and salmon populations in their respective ranges. In Wyoming, TU's membership of more than 1,500 anglers and 13 chapters spend countless volunteer hours each year working on projects that meet the mission of the organization.
1130	The Wyoming Wildlife Federation (WWF), established in 1937 and with current standing membership of over 5,000, is Wyoming's oldest and largest statewide conservation organization. Our mission is to work for hunters, anglers and other wildlife enthusiasts to protect and enhance habitat, to perpetuate quality hunting and fishing, to protect citizens' rights to use public lands and waters, and to promote ethical hunting and fishing. Our comments will focus on wildlife, ground and surface water, and recreation. This project includes many wells, rigs, associated infrastructure, and an increase of human activity. Increased disturbance in a landscape results in elevated negative pressure on other multiple uses.
1132	With continued geopolitical instability, the need for reliable, domestic sources of clean burning fuel continues to grow. Public lands managed by the BLM must be utilized for multiple uses, including energy development. As gas produced from traditional supply sources decline, the untapped natural gas potential on BLM lands, as well as other federal lands, must take a larger role in meeting the nation's continually increasing energy needs.
1132	The NPL Project can and will achieve a balance between environmental protection, economic growth, and other multiple uses to help meet our nation's energy needs.
Policy, Regulation, and Permitting	
1009	Any utilities that encroach into our R/W will need to be permitted with a utility permit.
1037	5) It is my understanding that the BLM as mandated by FLPMA is required to administer the lands under its supervision for multiple use. Looking at a map of the Upper Green River Valley, with all its gas fields abutting each other, it is difficult to see the balance between gas field development and other uses.
1065	Areas such as the Normally Pressured Lance EIS area must be utilized for multiple uses, including energy development. The project proposal serves the National Energy Policy, and we believe this project can and will achieve a balance between environmental projection, economic growth, and other multiple uses.
1091	Exceptions should be a rarity. Encana should know what it's doing pretty solidly for at least three to six months and should be able to plan around wildlife. The BLM is obligated by law to facilitate development but not to ensure that developers make the maximum profit by going gangbusters in the field.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1095	Now, EnCana proposes an additional 3,500 wells across 141,800 acres of land surrounding the Jonah Field. This should trigger the BLM to fundamentally re-assess the scale and scope of oil and gas development in the Upper Green River Valley, and how much more full-field development can be sustained before the BLM can no longer fulfill its multiple use mandate pursuant to FLPMA to provide multiple uses, including wildlife, air quality, and watersheds.
1099	Storm Water Associated with Construction Activities. This permit is required any time a project results in clearing, grading, or otherwise disturbing one or more acres. The disturbed area does not need to be contiguous. The permit is required for surface disturbances associated with construction of the project, access roads, construction of wetland mitigation sites, borrow and stockpiling areas, equipment staging and maintenance areas and any other disturbed areas associated with construction. A general permit has been established for this purpose and either the project sponsor or general contractor is responsible for filing a Notice of Intent (NOI) and complying with the provisions of the general permit. The NOI should be filed no later than 30 days prior to the start of construction activity. Please contact Barb Sahl at 307-777-7570.
1099	Discharge Permit. Any discharges to "waters of the state", including discharges from cofferdam dewatering, discharges from hydrostatic pipeline testing, or discharge of other waste waters must be permitted under the Wyoming Pollutant Discharge Elimination System (WYPDES) program. This program is part of the federal Clean Water Act, but is administered by the WQD. For clarification waters of the state include rivers, streams, dry draws, wetlands, lakes, reservoirs and even stock ponds. This permit will require some sampling and will incorporate effluent limits for any constituents of concern. Roland Peterson (307-777-7090) can provide additional information.
1099	Temporary Turbidity Variance. Wyoming has turbidity criteria for waters designated as fisheries or drinking water supplies. Any type of construction activity within these streams is likely to result in an exceedence of these criteria. However, in accordance with Section 23(c)(2) of the Chapter 1 Surface Water Quality Standards, the administrator of the Water Quality Division may authorize temporary increases in turbidity above the numeric criteria in Section 23 (a) of the Standards in response to an individual application for a specific activity. While it is not required to get this authorization, this project has the potential to exceed the turbidity criteria and a variance is recommended. An application must be submitted and a variance approved by the administrator before any temporary increase in turbidity above the numeric limits takes place. This process generally takes about 45 days. Please contact Jeff Clark at 307-777- 6891 for more information.
1099	Water Supply Wells. The WQD would like to remind the BLM that the Wyoming State Engineer (SEO) has regulations governing the sanitary construction of water supply wells and the Wyoming Oil and Gas Conservation Commission (WOGCC) has regulations governing the siting and construction of water supply wells proximal to oil and gas exploration and production facilities.
1099	Section 404. While not a state permit, this project may require a section 404 permit from the US Army Corps of Engineers. Any time work occurs within waters of the US a 404 permit may be required. Please contact the Corps (307-772-2300) for specific information regarding jurisdiction and requirements.
1102	Recent policy and guidance on how BLM Master Lease Planning and Energy Lease Reforms will be implemented for this project and surrounding areas.
1109	We also request that BLM require complete adherence to the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, without granting exceptions.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1120	Industry is still not using best practice technology because they are not forced to.
1120	The BLM does a good job of allowing exceptions to rules that were once put in place to protect our wildlife and habitat. I feel the Mesa is proof enough of what can happen when oil and gas "develops" an area. No study needed there.
1123	If this area is designated in nonattainment-a virtual certainty-the State will be required to revise its state implementation plan (SIP) to reflect the new legal status. The revised SIP could put in place many requirements that are not currently reflected in the legal framework that BLM and the DEQ are operating under. Thus, it seems inappropriate to move toward approving this project until the air quality law that will apply to this project is more clearly settled.
1123	However, in addition to complying with the provisions in the applicable RMPs relative to sage-grouse and big game resources, we feel several other requirements must also be met. Relative to sage-grouse, we believe the BLM must ensure compliance with the State of Wyoming's sage-grouse Executive Order (EO) issued by the Governor. Executive Order 2010-4 (Aug. 18,2010). Perhaps most importantly, the EO provides that surface disturbance in core areas will not exceed five percent of suitable sage-grouse habitat per 640 acre section of land. In addition to the EO, we believe the BLM must also comply with the provisions in the Wyoming Game and Fish Department's "Stipulations for Development in Core Sage Grouse Population Areas."
1123	A. Requirements for BLM to Minimize Adverse Environmental Impacts and Protect Environmental Qualities. 1. The 3101.1-2 Regulation. Any rights granted in a lease arc made "subject to" reasonable measures that may be required by the authorized officer, with such reasonable measures being as needed to "minimize adverse impacts to other resource values, land uses or users not addressed in the lease stipulations at the time operations are proposed." 43 C.F.R. § 3101.1-2. BLM is given the right, consistent with lease rights granted, to modify the siting or design of facilities, the timing of operations, and can specify interim and final reclamation measures; however, reasonable measures "are not limited to" these actions. Id. While the regulation specifies that actions are consistent with the lease rights granted if they do not exceed three limits,4 [[Footnote 4: 4 The regulation states that reasonable measures "{a)t a minimum" are consistent with lease rights granted if they do not require relocation of the proposed operation by more than 200 meters, require operations to be sited off of the lease, or prohibit surface disturbing operations for more than 60 days in a lease year. 43 C.F.R. § 3101.1-2.]] the regulation is also explicit that these three limits are "[a]t a minimum" of what is consistent with lease rights. As BLM stated when it adopted this rule, "the authority of the Bureau to prescribe 'reasonable,' but more stringent, protection measures is not affected by the final rulemaking." 53 Fed. Reg. 17,340, 17,341 (May 16, 1988). The Interior Board of Land Appeals (IBLA) also recognized that a constrained interpretation of the 3101.1-2 regulation is not warranted: "[This] constrained interpretation of a 'reasonable measure' [that would only allow imposition of the three listed limits] is at odds with the plain language of the regulation, which describes what measures 'at a minimum' are deemed consistent with lease rights, and does not purport to prohibit as unreasonable per se measures that are more stringent." Yates Petroleum Corp .. 176IBLA 144, 156 (2008).

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1123	2. The Standard Lease Form. Section 6 of BLM's standard lease form (form 3100-11) requires the lessee to conduct operations in a manner that "minimizes" adverse impacts to a host of environmental resources. Reasonable measures "deemed necessary by lessor" (i.e., BLM) must be taken by the lessee to accomplish this intent. Again, the BLM can modify the siting or design of facilities, the timing of operations, and specify interim and final reclamation measures to achieve these needs, but BLM's specification of reasonable measures "are not limited to" just these measures.
1123	3. Leasing, Permitting, and Easement Regulations. BLM's regulations for leases, permits, and easements also require BLM to minimize environmental impacts. These regulations require that every land use authorization contain terms and conditions which shall "[m]inimize damage to scenic, cultural, and aesthetic values, fish and wildlife habitat, and otherwise protect the environment." 43. C.F.R. §2920.7(b)(2). A number of other environmental protection requirements are also found in these regulations, including the regulation requiring compliance with air quality standards that was mentioned above.
1123	4. Onshore Oil and Gas Order No.1. Another source of authority requiring BLM to minimize adverse environmental impacts from oil and gas operations is Onshore Oil and Gas Order No.1. The Order requires that, "[t]he operator must conduct operations to minimize adverse effects to surface and subsurface resources, prevent unnecessary surface disturbance, and conform with currently available technology and practice." Onshore Order No.1 § IV. In approving an Application for Permit to Drill (APD), BLM must attach conditions of approval that reflect necessary mitigation measures, including reasonable mitigation measures to ensure that operations "minimize adverse impacts to other resources. " Id. § III.F.a.3.
1123	5. BLM's Oil and Gas Operations Regulations Mandate Compliance with the Minimization Standard and Impose an Additional Duty to Protect Natural Resources and Environmental Quality. BLM's oil and gas operations regulations reinforce the obligation to minimize adverse impacts. The authorized officer is authorized and "directed" to, among other things, "require compliance with lease terms, with the regulations in this title, and all other applicable regulations .... " 43 C.F.R. § 3161.2. Consequently BLM compliance with the minimization standard in the standard lease form, the 3101.1-2 and 2920.7(b)(2) regulations, and Onshore Order No.1 is required by this regulation. Moreover, pursuant to this regulation the authorized officer must also require that operations be conducted in a manner that "protects" other natural resources and environmental quality.5 [[Footnote 5: 5 See also 43 C.F.R. §§ 3162.1(a) (requiring the operating rights owner to conduct operations in a manner which protects other natural resources and the environment); 3162.5-1(a) (same, also giving authorized officer authority to determine conditions of approval); 3162.5-1 (operator much exercise due care to assure operations do not cause undue damage to surface resources).]]Id. The word "protect" means to keep from being damaged or injured, to guard. THE AMERICAN HERITAGE DICTIONARY OF THE ENGLISH LANGUAGE 1409 (4-IH ed.).

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1123	C. The Supreme Court's Interpretation of the Word "Minimize." In Entergy Corp. v. Riverkeeper, Inc., 129 S. Ct. 1498 (2009), the United States Supreme Court offered a somewhat restricted view of the meaning of "minimizing" in a Clean Water Act case. In Entergy the Supreme Court determined that minimize "is a term that admits of degree and is not necessarily used to refer exclusively to the "greatest possible reduction."" 129 S. Ct. at 1506. This interpretation allowed the Court to hold that it was permissible for the EPA to conduct cost benefit analyses to set national performance standards and to allow variances thereto in order to meet a statutory requirement for cooling water intake structure standards that "reflect the best technology available for minimizing adverse environmental impact." Id. at 1503, 1505-1506, 1510. But despite this interpretation of the word minimizing, we believe that in the context of BLM oil and gas decision-making as opposed to section 316(b) of the Clean Water Act, which was all that Entergy concerned, and all that its holding strictly applies to-BLM nevertheless has very strong obligations to reduce the adverse environmental impacts of such development.
1123	D. Additional Supreme Court Precedents. Despite Entergy, in numerous cases the Supreme Court has made it clear that the ordinary, dictionary definition of a word is the place to start in finding its meaning and that all words in a law should be given effect. For example, recently in Ransom v. FIA Card Serv., 131 S. Ct. 716 (Jan. 11,2011), the eight-justice majority stated, "we look to the ordinary meaning of the term" in order to determine the meaning of the word "applicable." 131 S. Ct. at 724 (citing Hamilton v. Lanning, 130 S. Ct. 2464 (2010)) (citing also the definitions of "applicable" found in Webster's Third New International Dictionary and the New Oxford American Dictionary). Moreover, the Court recognized ""[W]e must give effect to every word of a statute wherever possible."" Id. (citing Leoeal v. Ashcroft, 543 U.S. 1, 12 (2004)). And it was essential that the word applicable "carry meaning as each word in a statute should." Id. Long ago the Supreme Court said, We are not at liberty to construe any statute so as to deny effect to any part of its language. It is a cardinal rule of statutory construction that significance and effect shall, if possible, be accorded to every word. [In an early legal work] it was said that 'a statute ought, upon the whole, to be so construed that, if it can be prevented, no clause, sentence, or word shall be superfluous, void, or insignificant.' This rule has been repeated innumerable times. Another rule equally recognized is that every part of a statute must be construed in connection with the whole, so as to make all the parts harmonize, if possible, and give meaning to each. Market Co. v. Hoffman, 11 Otto 112 (Supreme Court 1879). See also Duncan v. Walker, 533 U.S., 167, 174 (2001) (citing six Supreme Court cases for the same or similar propositions), Dodd v. US., 545 U.S. 353, 370 (2005) (same).

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1123	Given this precedent, which is just as binding and persuasive as that found in Entergy, it seems apparent that "minimize" in BLM's oil and gas regulations and other authorities must be given meaning, and the meaning should follow the ordinary dictionary definition of the word unless that is precluded by the terms or overall structure of the laws in question. While the Court in Entergy may have had a basis for concluding that in the context of the Clean Water Act minimize is a term that "admits of degree", this interpretation should not be viewed as universally true given other Supreme Court precedent that makes it equally clear that the ordinary meaning of a word should prevail if at all possible, and that in any event every word in a law must be given effect and meaning. Accordingly, unless a different interpretation is demanded by the context in which the word minimize is used in the various regulations and other authorities cited above, minimize should be interpreted in accordance with its ordinary meaning, which is "[t]o reduce to the smallest possible amount, extent, size, or degree." The context in which minimize is used in these authorities does not support a definition of minimize other than its ordinary dictionary meaning, and thus BLM must minimize the environmental impacts of the NPL Project in the ordinary sense of the word as a condition of approving the project.
1123	E. Overarching Statutes Support a View that a Strong Definition of Minimize Should Apply and Applying Such a Definition would not be Inconsistent with Lease Right Granted. 1. The Requirements of FLPMA and the Mineral Leasing Act. There are three statutory provisions that support a view that the ordinary definition of minimize should apply, and that a significant modification of the definition is not appropriate. The FLPMA provides that the Secretary of the Interior "shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the [public] lands." 43 U.S.C. § I 732(b). One court found that "[a] reasonable interpretation of the word 'unnecessary' is that which is not necessary for mining. 'Undue' is that which is excessive, improper, immoderate, or unwarranted." Utah v. Andrus, 486 F. Supp. 995,1005 n.13 (D. Utah 1979). Thus, excessive, improper, immoderate, or unwarranted impacts must be prevented to comply with FLPMA's mandate to prevent undue degradation of the public lands.6 [[Footnote 6 : There is little doubt that the undue degradation clause is the clause that must be considered here, not the unnecessary degradation clause. See Mineral Policy Center v. Norton, 292 F. Supp. 2d 30, 42 (D.D.C. 2003) (making it clear that both clauses are mandatory obligations, but stating, "FLPMA, by its plain terms, vests the Secretary of the Interior with the authority-and indeed the obligation-to disapprove of an otherwise permissible mining operation because the operation, though necessary for mining, would unduly harm or degrade the public land.").]] The Mineral Leasing Act provides that BLM shall regulate oil and gas surface disturbing activities and shall determine actions "required in the interest of conservation of surface resources." 30 U.S.C. § 226(g). The word "conservation" means, among other things, "[t]he protection, preservation, management, or restoration of wildlife and natural resources such as forests, soil, and water." THE AMERICAN HERITAGE DICTIONARY OF THE ENGLISH LANGUAGE 391 (4T11 cd.).

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1123	And under FLPMA, BLM must manage the public lands under principles of multiple use and sustained yield. 43 U.S.C. § 1732(a). The definition of "multiple use" in FLPMA partly provides that BLM must not cause "permanent impairment of the productivity of the land and the quality of the environment, .. " when considering the relative values of the resources "and not necessarily the combination of uses that will give the greatest economic return or the greatest unit output." 43 U.S.C § 1702(c). "Impair" means "[t]o cause to diminish, as in strength, value, or quality .... " THE AMERICAN HERITAGE DICTIONARY OF THE ENGLISH LANGUAGE 878 (41~ ed.). Synthesizing these standards does not indicate that a definition of "minimize" other than its ordinary meaning should be applied to the NPL Project. The need to "reduce to the smallest possible amount, extent, size, or degree" (minimize) is consistent with the need to prevent excessive impacts (undue degradation clause), protect, preserve, manage, and restore surface resources (Mineral Leasing Act provision), and prevent impairment of the productivity of the land and the environment (multiple use definition). When these authorities are considered, the ordinary definition of minimize should continue to prevail as BLM considers its obligations.
1123	2. The Ordinary Definition of Minimize is Consistent with the Lease Rights Granted. The underlying thrust of these numerous substantive requirements would not support anything more than a minor deviation from the ordinary meaning of the word "minimize." While "minimize" perhaps "admits of degree" in some cases, the word, when considered in the overall regulatory and statutory context of the laws applicable to BLM oil and gas development, demands that BLM must require the "greatest possible reduction" of environmental impacts, or something much like that. This ordinary interpretation of the word would still accord with the statement in some of the authorities that the imposition of reasonable measures to minimize impacts must re "[t]o the extent consistent with lease rights granted." The lease rights granted are: (1) that the leaseholder has the exclusive right to extract all of the oil and gas resource on the leasehold (Form 3100-11); (2) that the lessee has the right to "use so much of the leased lands as is necessary to [extract] all of the leased resource" (43 C.F.R. § 3101.1-2); and (3) that the lessee has the right to build and maintain necessary improvements on the leasehold (Form 3100-11).7 [[Footnote 7: 7 The objective of BLM's operations regulations is to "promote the orderly and efficient exploration, development and production of oil and gas", 43 C.F.R. § 3160.0-4, and to allow for the "maximum ultimate recovery of oil and gas ... ", 43 C.F.R. § 3161.2.]] No other rights are granted. These are the only rights that must be maintained while also ensuring impacts are minimized.

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1123	These lease rights and the objectives of the regulations can be honored while still minimizing adverse environmental impacts in the ordinary sense of the word. There probably is no question that Encana will have the exclusive right to develop all of the oil and gas on these leases, so impingement on that lease right is not threatened by demanding the utmost in environmental protection. As to the right to "use" so much of the lease as is "necessary" to extract "all" of the oil and gas and to build "necessary" improvements so as to extract the oil and gas, the following should be noted. The word "necessary" does not confer unqualified rights to the lessee to pursue development as it sees fit and desires. Rather, "necessary" means that which is "convenient, useful, appropriate, suitable, proper, or conducive to the end sought." BLACK'S LAW DICTIONARY 1029 (6th ed. 1990). That is, being able to do what is "necessary" to extract all of the oil and gas and what is "necessary" to build related facilities must be interpreted in the overall context of the lease rights granted-that context defines what in necessary. The context of the lease rights granted is that immediately after granting the above-mentioned rights, the standard lease form makes any rights granted "subject to" an array of conditions. The lease is "subject to" applicable laws, the terms, conditions, and stipulations found in the lease, regulations and formal orders in place when the lease is issued, and regulations and formal orders issued afterward if not inconsistent with the lease rights granted. Additionally, the 43 C.F.R. § 3101.1·2 regulation makes the lease "subject to" stipulations, restrictions in specific, nondiscretionary statutes, and such reasonable measures as might be required "to minimize adverse impacts to other resource values, land uses or users, not addressed in the lease stipulations at the time operations are proposed." As is apparent, the rights created by a federal onshore oil and gas lease are conditional and certainly unfettered rights are not created.
1123	The conditional nature of a Federal onshore oil and gas lease was recognized many years ago by the Supreme Court when it stated, Unlike a land patent, which divests the Government of title, Congress under the Mineral Leasing Act has not only reserved to the United States the fee interest in the leased land, but has also subjected the lease to exacting restrictions and continuing supervision by the Secretary .... [The Secretary] may prescribe, as he has, rules and regulations governing in minute detail all facets of the working of the land. In short, a mineral lease does not give the lessee anything approaching the full ownership of a fee patentee, nor does it convey an unencumbered estate in the minerals. Boesche v. Udall, 373 U.S. 472, 477·78 (1963). And in a BLM Information Bulletin (18), the BLM acknowledged that "[t]he Secretary has broad authority and discretion under the [Mineral Leasing Act] to administer oil and gas leasing and operations of those leases." IB 2007·119 (reviewing existing surface management authority for oil and gas leases and concluding BLM has broad authority to regulate such operations).

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1123	So what is "necessary" to develop the lease must be interpreted in light of these limitations that have also been put in place. This will define what measures BLM can demand to minimize adverse impacts, while still acting in a way that is "consistent with lease rights granted." When this is done it apparent BLM can require strong measures to protect the environment. At a minimum, the lease terms (section 6 in Form 31 OQ·l1), regulations (43 C.F.R. § 3101.1·2 and others), and formal orders (Onshore Order No. 1)--all of which any lease rights granted have been made "subject to"-require minimization of impacts and/or efforts to protect the environment. Those obligations- and those in the FLPMA and Mineral Leasing Act-are at least co-equal with any lease rights that allow the lessee to do what is "necessary" to extract the oil and gas and to build related "necessary" facilities. The lease has explicitly been made "subject to" these limitations. Accordingly, any exercise of "valid existing rights" so as to maximize oil and gas recovery in an orderly and efficient manner must be done in a way that also minimizes environmental impacts in the ordinary sense of the word.
1123	Finally, we have enclosed herewith as Exhibit 5 an article that describes BLM's extensive "retained rights" that it enjoys allowing it to protect the natural environment in areas that have been leased. We ask the BLM to fully consider this article as it determines how to minimize the environmental impacts of the NPL Project
1123	Exhibit 5 BLM'S RETAINED RIGHTS: HOW REQUIRING ENVIRONMENTAL PROTECTION FULFILLS OIL AND GAS LEASE OBLIGATIONS By BRUCE M. PENDERY. "There are approximately 39,000,000 acres of federal mineral estate in the eleven western states subject to onshore oil and gas leases issued by the Bureau of Land Management (BLM). The leases grant the lessee the right to extract any oil or natural gas that may be found on the lease."
1123	Under numerous legal authorities the BLM must minimize the adverse environmental impacts of the NPL Project. If the BLM fully exercises its retained rights under the onshore oil and gas leases at issue here it can meet this responsibility and ensure that ozone levels are reduced to within legal standards, that visibility in Class I areas is protected, that sage-grouse are protected so as to prevent the need to list them under the Endangered Species Act, and that socially valued big game populations are maintained in this area. We ask the BLM to ensure these needs are fully met before approving the NPL Project, and again emphasize that BLM is legally required to protect these resources before approving this project.
1125	Sweetwater County Construction/Use Permits: Even though this project is proposed to be located in Sweetwater County, in the event that there are accessory or associated facilities are planned to be located in Sweetwater County, please be aware that Sweetwater County Construction/Use Permits are required for development with the County. Temporary or short term facilities such as temporary construction storage yards, staging areas and man-camps will require Sweetwater County Conditional Use Permits. For more information on Construction Use/Permits or Zoning permits, please contact John Barton, Sweetwater County Land Use Planner at 307-872-3915.
1125	Work Camps: The Sweetwater County Comprehensive Plan - 2002 encourages "....the location of associated worker housing within existing communities where services are/can be provided." If a compelling need can be demonstrated, a work camp may be permitted through the Sweetwater County Conditional Use Permit Process. This permitting process takes 60 to 90 days to complete. For more information on Sweetwater County Conditional Use Permits for work camps, please contact John Barton, Sweetwater County Land Use Planner at 307-872-3915.

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Comment Document Number	Comment
1127	With this in mind, management prescriptions in the analysis must reflect multiple use resource principles. Congressional mandates, federal statutes, and implementing regulations call for multiple uses on BLM administered lands. WDA particularly believes the Congressional policy expressed in the Federal land Policy and Management Act of 1976 (FLPMA) regarding livestock grazing, needs to be specifically noted in the environmental document. FLPMA Sec. 102(8) states "The Congress declares that it is the policy of the United States that. .. the public lands be managed in a manner ... that will provide food and habitat for fish and Wildlife and domestic animals ... " Many in the public are unaware of this Congressional policy and do not understand how critical the utilization of these lands are to livestock grazing, permittees, local communities, the continued health of the resource and the State of Wyoming.
1128	The NOI states in part: *An updated inventory of lands with wilderness characteristics will be utilized to comply with Secretarial Order 3310. Federal, State, and local agencies, along with other stakeholders interested in or affected by the BLM's decision on this project are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate as a cooperating agency.* Pursuant to Section 1769 of the Appropriations Act for the Department of Defense and the other departments and agencies of the Government for the fiscal year ending September 30, 2011, and for other purposes., Pub. L. 112-10, BLM lacks any authority to implement Secretarial Order 3310 including assessing the impacts on lands said to have wilderness character. BLM has no legal authority to manage public lands outside of wilderness study areas (WSAs) as if they were WSAs.
1130	Review and include as appropriate the Interior Board of Land Appeals decision in William P. Maycock 177 IBLA 1 (March 16, 2009).
1132	Natural gas production from the NPL Project Area is consistent with this nation's energy policy as articulated in the Comprehensive National Energy Strategy announced by the United States Department of Energy in April of 1998, the Energy Policy and Conservation Act, 42 U.S.C. § 6201, the National Energy Policy, Executive Order No. 13212, 66 Fed. Reg. 28357 (May 18,2001), and the Energy Policy Act 0[2005, Pub. L. No. 109-58, 119 Stat. 594.
1132	The CAA clearly places authority over Wyoming's air resources in the hands of the State. Congress enacted the CAA in 1970, establishing a joint state and federal program to address the nation's air pollution. See 42 U.S.C. §§ 7401 - 7671q. Congress vests each State with the primary responsibility for assuring air quality within the entire geographic area comprising the State, including federal lands. 42 U.S.C. § 7407(a). This includes the regulation of air quality for all of the various programs of the CAA, including the National Ambient Air Quality Standards (NAAQS), the Prevention of Significant Deterioration (PSD) program, and the visibility or Regional Haze (RH) program.

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Comment Document Number	Comment
1132	EPA has promulgated the NAAQS for the six identified criteria pollutants - Carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen oxides (NOx), ozone (03), lead, and particulate matter (PMz.5 and PMIO}-to protect public health, allowing for an adequate margin of safety that takes into account sensitive populations. See 42 U.S.C. § 7409(b). EPA reevaluates the NAAQS every five years to update the science and ensure that the standard continues to adequately protect public health. See id. § 7409(d). The State of Wyoming, through the Wyoming Department of Environmental Quality (WDEQ) Air Quality Division, has authority to achieve and maintain state and federal air quality standards in Wyoming. See 42 U.S.C. §§ 7401 - 7671q; 40 C.F.R. pts. 50 - 99 (2007); 40 C.P.R. § 52.2620 (Wyoming's State Implementation Plan); WYO. STAT. ANN. §§ 35-11-201 to 214 (LexisNexis 2008); Wyo. Air Quality Stds. & Regs. (WAQSR) Chs.1-14. Wyoming implements its responsibility by submitting a state implementation plan (SIP) to the EPA specifying what emission reductions and other control measures it will use to attain the NAAQS. Once EPA approves the SIP, it is codified and enforceable as federal law.
1132	Wyoming's federally approved SIPs include a permitting program that addresses both major and minor sources. Wyoming's permitting program exceeds the federal program by requiring construction permits for any source that may emit any air contaminant in any form, including minor sources from oil and gas operations. See WYO. STAT. ANN. §§ 35-11-201 -203 (LexisNexis 2008); see also WAQSR Ch.6 § 2(a)(i) (pg. 6-1). Wyoming requires that all sources, including minor sources from oil and gas operations, implement BACT to reduce or eliminate emissions. See WAQSR Ch. 6 § 2(c)(v) (pg. 6-3); see also WDEQ Regulations for Oil and Gas Operations. As part of the permitting process, WDEQ requires applicants for both major and minor sources to demonstrate that the proposed facility "will not prevent the attainment or maintenance of any ambient air quality standard" or "cause significant deterioration of existing ambient air quality" before an air quality permit will issue. WAQSR Ch. 6 § 2(c)(ii), (iii) (pg. 6-3).
1132	BLM has a minor role in the CAA's complex scheme. Under the CAA, a federal land manager's authority is strictly limited to considering whether a "proposed major emitting facility will have an adverse impact" on visibility within designated Class I areas. 42 U.S.C. § 7475(d)(2)(B). Although federal land managers with jurisdiction over Class r areas may participate in the development of regional haze SIPs, the BLM has no such jurisdiction in Wyoming. 42 U.S.C. § 7491. Accordingly, the BLM has no authority over air quality, and cannot impose emissions restrictions, either directly or indirectly, on natural gas operations in Wyoming.
1132	Because BLM lacks authority under the CAA over air quality, BLM may not attempt to regulate air emissions in the NPL Project Area. Moreover, in the NPL Project ElS, BLM should expressly acknowledge that, as a matter of federal law, the State of Wyoming has the authority to directly regulate air quality in the NPL Project Area. Furthermore, BLM must acknowledge that it defers the regulation of emissions to the State's authority.
Reclamation	
1039	Also after these wells are completed I hope that not only will you reclaim all the land but you do it well also and not a lazy job. It is your job to not only pull these natural resources from the ground but to restore the ground you use.
1045	Also the Surface area of the land can be disturbed but after everything is done, and the well is producing the natural ground can be brought back to what it was before by re-planting all the previous grasses and sage brush.
1046	The land will also be a little messed up but they could restore it by planting stuff back there when they are done so that way it will kind of look like it was before.

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Comment Document Number	Comment
1050	Land reclamation is definitely being done after the oil company's leave, but usually that land is covered in sage brush and noxious weeds before the oil companies arrive. When the land is reclaimed, instead of changing it back to the way it was by planting sage brush and other weeds why not better the land by planting green grasses instead? When the environmental impact statement is written I hope you consider ..... land reclamation factors.
1095	We are concerned that the reclamation track record in this area is very poor, and even reclaiming well field disturbances back to historic BLM standards (which are very weak) is not occurring in neighboring areas such as the Jonah Field. Returning sagebrush habitat to its natural state is likely to take 100 years or more, and that assumes that sagebrush takes root relatively immediately, which is not typically the case in this area. We are concerned that this project will contribute to the spread of noxious weeds including halogeton and kochia, which have a history of proliferating in oil and gas fields in this part of Wyoming. Once these weeds take root on roads and well pads, they begin to spread into surrounding areas not subjected to surface disturbance. Mitigation measures will need to be provided to ensure that the threat of noxious weeds is minimized.
1099	The analysis should include the cost of reclamation, long term monitoring, and other costs associated with surface disturbance.
1099	Because of the dry climate, short growing season and poorly developed soils, reclamation in Wyoming is often difficult, expensive and time consuming; therefore, there will likely be several years before sufficient vegetation is established to buffer overland flows and erosion potential from the disturbed areas. The reclamation plan must comply with the Wyoming Reclamation Policy and should be clearly described in the EIS, including measures to monitor success and revegetate where needed.
1104	Topsoil should be saved and spread over disturbed areas as soon as possible after disturbance to accelerate reclamation.
1104	Wildlife are often highly dependent upon plant communities that are tied to a specific site. We recommend planting a vegetation mix that meets these criteria for any disturbed site. WGFD personnel are available for input into seed mixes.
1104	All reclamation work should be initiated within one year of completion of exploratory work. • Given the lack of technology to reclaim deciduous mountain shrub communities, these important wildlife habitats should be avoided during drilling operations. • Roadside re-vegetation should consist of a mixture of warm and cool season, unpalatable grasses to avoid enticing wildlife into the right-of-way corridor. • Re-vegetation in native habitats should consist of a mixture of warm and cool season native grasses, forbs, and shrubs. Non-native plant species should be avoided. • If hay or straw is used as mulch, only weed-free material should be used. • Avoid planting monocultures. Carefully plan for a complex of vegetation that reflects the diversity of plant species and habitats in the surrounding area. • To expedite reclamation, use of wood platforms may be used on slopes <3% grade to avoid removing vegetation, speeding reclamation efforts.
1104	Stream banks should be re-stabilized using vegetation. Willow clumps or native potted plants should be used to stabilize the disturbed banks.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1104	Any riparian canopy or bank stabilizing vegetation removed as result of construction activities should be reintroduced and protected from grazing until the new growth is established. Willow clumps and/or potted native plants should be used as they will provide protection and healing of the disturbed areas more quickly.
1104	Disturbed areas should be reseeded with appropriate plant varieties as soon as possible after the disturbance.
1108	7. Vegetation restoration and enhancement to prevent noxious weeds such as cheat grass while providing forage for native species.
1120	I would also request that someone publishes an account of how much of the land that Encana has reclaimed and rehabilitated for wildlife. They should not be allowed an additional area before their current project is completed and restored.
1121	Facilitate effective reclamation to provide for soil health, water quality, and restoration of vegetation communities;
1121	Lincoln County supports an effective reclamation plan that is based on actual soil types, precipitation, and altitude. Reclamation in the high desert areas can be challenging and needs to be adjusted for each site.
1121	The reclamation plan needs to take into account other uses by livestock, wildlife, and wild horses. The project is located in a wild horse herd management area and includes crucial big game winter range. Game use and wild horses, neither of which is controlled, can adversely affect reclamation success.
1121	Stockpiling soil for a long time will kill microbes and reduce its value. Stockpiled soil should instead be turned or spread to keep it viable. Similarly interim reclamation may actually create greater surface disturbance, where a site is reclaimed only to be torn up in a few years and then reclaimed again.
1126	.:. Soil conditions and seeding with indigenous plants will happen,
1127	The WDA strongly recommends the PFO provide for tracking and monitoring of all impacts within the project area. Monitoring data should include surface disturbance impacts, reclamation efforts, along with invasive and noxious weeds. These monitoring efforts should put a focus on Healthy Rangeland Standards and the importance of reclamation success. We highly recommend the PFO provide this data to cooperators and livestock grazing permittees to follow field development and the ability to adaptively manage their operations.
1128	An annual report should also be submitted by the Operator on reclamation status.
1128	In the 2008 EA, BLM proposed to close all new and improved roads not required for routine operation and maintenance of producing wells or ancillary facilities would be reclaimed. This should not occur unless the State Land Board or private landowner consents and the road is not needed by the County.
1128	Reclamation of existing two-track roads would be considered on a case-by-case basis. CLG members note that in many cases the roads serve other uses, such as grazing permit or recreation access. While the BLM has issued a right-of-way over the road for the lessee, any decision to reclaim the road should be made only after consultation with the counties and affected land users.

Table E-2. Scoping Comments by Issue Category

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1128	Reclamation success can be very difficult to achieve in a cold desert environment. The difficulty in successful reclamation is further complicated by the frequent or persistent drought cycles and saline soils. Performance-based, as opposed to prescriptive standards, allow the Operators to adapt operations to the variability of soils, precipitation, and vegetation found in the project area. The standards should be defined for the affected biological and physical resources, as well as potentially conflicting land uses. CLG recommends that the project establish performance-based standards that focus on site stabilization within the first year, with interim revegetation, and final reclamation with native species. Reclamation needs to be tailored to site activity, site capability, and adapt to what works.
1128	Interim Reclamation should be in close coordination with BLM, the local cooperating agencies, and any affected livestock grazing permittees or landowners. Disturbed areas not needed for long-term production operations or vehicle travel should be reclaimed after production facilities are completed with a self-sustaining, vigorous, diverse, native or otherwise approved plant community sufficient to minimize visual impacts, provide forage, stabilize soils, facilitate capture of rainfall and snow and reduce runoff, and impede the invasion of noxious weeds and ensure establishment of natural plant community.
1128	BLM should secure the approval of the respective Conservation Districts as to seed mixtures. The local government cooperators have a stake in the outcome of reclamation as a whole. The alternatives should provide for the involvement of the local cooperating agencies in reclamation.
1128	Because native seed mixes are less successful, CLG recommends other techniques including mulching, initial irrigation, and sterile nonnative and native seed mixes to stabilize the soil and establish an environment suitable for native plants to grow. CLG recommends allowing for the use of desirable but sterile plant species to stabilize the site during interim reclamation and allow native plants to become established. To stabilize a site, the Operator should be able to use a mix of native and sterile seed mixes. Native species tend to be very slow and difficult to establish and during the several years required, noxious weeds or invasive plant species can become established. The noxious weeds cannot be chemically treated without also killing the native plants. CLG members note that native and non-native seed mixes used to good effect on drill sites on the Bridger-Teton National Forest. The native only reclaimed areas took longer to be restored.
1128	Native seed mixes often fail to survive or re-establish strongly. CLG recommends that the EIS provide for other techniques including mulching, initial irrigation, and sterile nonnative and native seed mixes to stabilize the soil and establish an environment suitable for native plants to become established.
1128	Operators should agree to plan and adjust for situations when reclamation is not working and where there are other resource conflicts
1128	During the operational and reclamation phases of the proposed project, BLM and Operators need to effectively consult and coordinate with the affected livestock operators and the Districts to address appropriate on-site well and road reclamation. Coordination on noxious weed control and any wildlife habitat and livestock mitigation should also occur, as appropriate. The Districts' expertise will help to overcome previous problems encountered in other gas fields. This is not possible if the local governments, including the Districts, are excluded from post-decision implementation of reclamation and mitigation.

Table E-2. Scoping Comments by Issue Category

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1129	The BLM should maximize reclamation plans that enhance the growth of shrub establishment, diversity of forbs and grasses, and phase each pad development with a thorough baseline vegetative inventory that accounts for age and class of vegetation that is to be disturbed. In areas where vegetation is in a later seral stage or declining stage of productivity, consideration should be given to developing that area first in order to accelerate the revegetation and enhancement of the current ecology.
1129	Properly implemented revegetation efforts to the areas of impact must include a collaborative monitoring protocol by both industry and agency personnel. As it currently happens, monitoring of the Jonah Field is the responsibility of the industry officials, according to the Jonah Reclamation Plan (2008). Loss of productive and critical habitat areas places undue hardships on wildlife survival; it also indirectly affects local businesses and the state wildlife management agency when the numbers of hunting permits are reduced in order to account for the loss of big game populations.
1129	To reiterate, the development of strong reclamation plans for sage grouse must be included in any mitigation plans in the EIS.
Recreation	
1039	My only concern with the production is the invasion of hunting land during the fall. I myself am a large hunter and partake in all seasons as much as I can and I worry about the exact locations of the wells and if they will invade the land I like to hunt on.
1102	A rigorous and structured approach to impact analysis, monitoring, and mitigation should be implemented including an updated baseline inventory …….. outdoor recreation.
1102	Phased development should be implemented for this project given recent impacts to .....and recreation resources – including impact thresholds based on science and stakeholder involvement that will sustain .....outdoor recreation throughout all phases of development.
1104	The proponent should schedule large truck activities to avoid opening weekend of big game seasons.
1104	The proposed project is located within the Upper Green River drainage and may cause impacts to the Green River along with several other intermittent drainages located within the NPL project boundary. The Green River is classified as a Blue Ribbon Wyoming Trout Stream, meaning it is of national importance to anglers and produces greater than 600 pounds of trout per mile. This river is an extremely important recreational fishery.
1128	The EIS should incorporate the FEIS discussion about recreation use. Area previously has had OHV use but the Pinedale RMP closes most of the resource area to OHV use except on existing trails. The RMP did not identify which trails or roads were closed but postponed the decision to a travel management plan. These OHV closures which apparently included snowmobiling removed a significant recreation component from the affected public lands.
1128	Hunting may also be affected by the operations, in terms of access and impacts on big game species. Due to reduced motorized access, however, it is not clear that natural gas development will be the conflict with recreation.
1129	The BLM must include an analysis on the impact to local and regional recreational fisheries use and businesses that depend on the coldwater fisheries within this region. Any impacts to water quality in this high quality watershed would not only significantly affect native and wild trout in these stream reaches, but the local and regional recreational use and businesses depending on these rivers.

Table E-2. Scoping Comments by Issue Category

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1130	Hunting and wildlife watching are economically important for Wyoming. Over 50 million U.S. citizens hunt and fish, according to data from state game and fish agencies. In 2006, 87 million Americans enjoyed some variety of recreational outdoor activity relating to fish and wildlife. In Wyoming, during 2006 more than 320,000 people participated in fishing and hunting. One of the fastest growing outdoor activities is wildlife watching and according to a US Fish and Wildlife Service survey, 716,000 people participated in some variety of this (USFWS 2006 National Survey of Fishing, Hunting, and Wildlife Associated Recreation). The total of hunting and fishing recreation days in Wyoming in 2008 was 3,683,371. Based on the number of recreation days and average expenditure per day, hunters, anglers and trappers expended approximately $685 million in pursuit of their sport (WGFD Annual Report 2008). The WGFD 2008 Annual Report also reports that non-consumptive users provided about $420 million wildlife watching, taking photographs, and hiking. In total over $1 billion dollars was spent in Wyoming in 2008 by outdoor enthusiasts. In 2008, Sportsmen for Responsible Energy Development conducted a survey called Sportsmen's Opinions on Oil and Gas Extraction Activities in the Rocky Mountain West, of sportsmen's opinions regarding oil and gas extraction on public lands. The survey concluded that the prominent concerns for Wyoming public lands are, "… increased poaching, the loss of access to hunting and fishing areas, decreased fish/wildlife populations, less fish/wildlife habitat, off-road vehicles, and increased water and air pollution." The NPL proposed project is entirely within pronghorn hunt area 90. Over 1,000pronghorn licenses are sold annually for this hunt area, which means many sportsmen and woman, and their families will be subject to reduced hunting conditions if this project moves forward. Coordinate with the WGFD as much as possible.
1130	Evaluate how the 3,500 wells of disturbance will impact the hunting opportunities the area currently affords.
1130	Provide opportunities for dispersed recreation uses in the area that are consistent with riparian and fisheries management objectives.
1130	Allow the recreation user the opportunity to have a high degree of interaction with the natural environment to have moderate challenge and to use outdoor skills.
1130	Evaluate the loss of hunting and fishing opportunities because of this development.
Social and Economic	
1001	The oil and gas industry is a great and expanding industry, it is ever changing and is pointing in a good direction. I believe the people that work for it want it to be safe and good for the environment because this is our home and we live in it. There is a good impact for this field it helps support local people and businesses if everybody can do their part to the fullest potential it can be a great thing for the counties and country.
1004	Obviously our natural resources are good for our state and those resources sustain individuals, families, and communities.
1006	Keep the jobs, keep the revenue, keep the gas flowing.
1007	This field will impact the community huge it will create a very large number of jobs and work in the area. If Encana didn't think it would have a negative impact on the community they would not even think about pursuing this field.

Table E-2. Scoping Comments by Issue Category

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1008	Our company has locations in Casper, Rock Springs, Gillette, and Douglas. We employ an average of 125 individuals on a full time basis. Much of our revenue is directly attributed to supply fuel and lubricants to the oilfield. We as a country have to have a strong commitment to developing our domestic resources and capabilities. Thank you for your consideration and my respect for continued employment.
1015	I have been a resident of Sublette County now for 10 years, and like the majority of residents in this county, I work in the Oil and Gas Industry. The same Industry that has given so much to us, and will give continue to give to our kids.
1015	With the approval of the EIS, it will provide this county with many long term jobs, which in turn will provide economic growth for this county. And in my opinion a county without growth will be a dying county. Please strongly consider approving the NPL EIS.
1016	I would like to voice my opinion on the NPL EIS. Oil and gas development is a major contributor to economic growth in southwestern Wyoming.
1016	NPL development would provide continued long term stable employment to residents of Sublette County and surrounding areas.NPL development would help support sustainable communities in southwestern Wyoming.
1016	Tax revenues from oil and gas production benefit Wyoming communities in many ways, including: schools, highways, law enforcement, public facilities, family assistance and outreach.
1017	I can say that the oil & gas industry, over the 34 years I've been in the industry, has provided a comfortable living for us, providing us with long term stable employment. The NPL development would continue to provide long term stable employment for my family and other residents of Sublette county and surrounding areas as well as help to support the community's sustainable growth in positive ways, contributing to lowering the state's overall unemployment percentage.
1017	Furthermore, tax revenues from oil and gas production has benefitted this community and others and my family in many ways: schools, highways, law enforcement, public facilities (PAC for one of many), family assistance and outreach.
1017	Encana's community investment program helps strengthen Wyoming communities through grants and other forms of financial assistance.
1017	My family and I would very much like to continue to live and work in Sublette county and Encana's proposal for the NPL development would ensure that we are allowed to do so. Jobs are scarce enough through-out the nation!!!! And I for one would like to see that my family, my children, my wife and I, have a roof over our heads, food in our bellies and clothes on our backs.
1019	Without this Job at Encana I would not be able to live in such a beautiful place
1019	.....more well's means more work, more money for our communities and schools, BLM. My children have twice opportunity to get a better education than I ever did schools here a second to none. I also shop locally to support our community, this is a great opportunity for Sublette county and the surrounding communities.
1020	I support clean, domestic energy production that provides jobs and future work for American's.
1020	Wyoming NPL natural gas will help provide an important energy resource for America while reducing our dependence on energy from our enemies abroad. Clean energy Domestic energy (not purchased from our enemies) Jobs for Americans Taxes for our state and country EnCana's commitment to our environment NPL is a complete economic rescue package for the USA. We need more of them.

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1021	I have been heavily involved over the past eight years in the planning of infrastructure, housing, public services etc as Mayor of the City of Rock Springs Wyoming. As the end of my second term came just recently, I decided not to seek another term and spend more time with my family and business. During my eight years as Mayor, I witnessed the positive impacts that gas development has made throughout the counties of Sweetwater and Sublette. By allowing the development of this clean-burning natural resource, our municipalities have been able to create opportunity for growth and economic development and the ability to enhance aging and failing infrastructure within our communities. The socio-economic aspect alone has been very rewarding to our state, counties and municipal governments. Past Governor Dave Freudenthal implemented the "Build a Better Wyoming" mentality and there is no possible method to do this without the revenues brought forth by developing our natural resources. Wyoming has been blessed with an abundance of natural resources and it should be our goal to continue to support the development of these resources in a responsible manner. The Jonah Field and proposed NPL project needs your support to maximize the recovery of these natural gas reserves - the fuel of choice for our entire nation. Our inability to give this support damages each one of our communities in many ways. The loss of businesses, loss of jobs, loss of homes, loss of families and children within our school systems and the loss of revenues to the state and local communities which in turn equates to the loss of improvements within these communities. The proposed NPL project is critical towards planning the future of our state. This plan will allow us the opportunity to bring forth new and better technology while ensuring the future of our communities and our businesses. It will spur economic development which is greatly needed in Wyoming.
1022	There are numerous positive impacts related to this project on local Wyoming residents. Wyoming has always been a "boom and bust" area, due to the gas industry. This project will help stabilize locals' financially and help keep people in Wyoming rather than moving to where the work is and leaving vacant homes to diminish home values all over. In general, Encana helps employ over a 1,000 people in Wyoming, which helps stabilize the communities in Wyoming.
1022	The tax revenues also greatly add in many communities, for example public buildings, law enforcement, schools and family assistance to name a few. All these things are examples of how and why the oil and gas industry help to keep Wyoming communities excelling and growing in positive ways.
1023	Allowing this expansion project maintains steady work for many highly skilled members of our community who otherwise would have to relocate if this project does not happen.
1023	Our local economies (grocery stores, small business, etc) depend heavily on the cash flow generated by EnCana's operations (Both taxes and sales) without this revenue these small business may fail which limits our local choices for goods and services.
1024	As a public school system and major employer in Sublette County, the district is reliant upon the jobs and tax revenues created and sustained by the natural resources industry. Stable tax revenues are necessary to maintain a reliable continuum of services to our students and their families. We ask for a timely review of the proposal so that an approved development strategy will allow revenues from the NPL project to progressively replace the decreasing production values that will occur in the Jonah field over the next ten years.

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1024	Encana has also proven to be a valuable community partner through their Encana Community Investment Program. They have assisted the school district in purchasing AED's and collaborated with the school in establishing an Energy Exploration class that is working to prepare our students for local jobs in the energy exploration industry.
1025	Encana Natural Gas has been a major contributor to economic growth in Wyoming. The NPL develop would provide continued long term stable employment for Sublette county and Sweetwater county. A smooth transition from Jonah to the NPL would stabilize the work force so there is not the Boom and Bust cycles as seen in the past. There are more than 1,100 workers for Encana across Wyoming, we need to maintain jobs in Wyoming
1025	Encana pays a large amount of taxes, Let's keep those taxes coming in for the schools and the county.
1026	Continuing natural gas development in Sublette County is critical for an ongoing sustainable community. A timely decision will provide a smooth transition from the Jonah field and providing stable jobs to support families and consistent tax revenues to keep schools and services intact.
1026	In addition, Encana has been active in community investments through grants and assistance.
1027	I have no doubt that the need for development of US energy sources cannot be understated and I am sure the powers that be are very much aware of that need, I am an energy industry worker as was my father up until the day he died in 2000. This industry has provided a source of stability and support for my family and many others as well as being a important part of the this Country economy and specifically the State of Wyoming.
1028	Just wanted to comment on this project, This will help keep our economy up from most states,
1030	What most people also desire, as well, is the ability to thrive economically; to have a decent paying job in order to provide for themselves and their families. Given the current state of our economy within Wyoming, and the United States, for that matter, economic stability and being able to maintain employment are crucial to our area and way of life. It is a fact that natural gas production is key to the overall economic stability of Southwest Wyoming. Currently more than 1,000 people are employed by just Encana operations across Wyoming. The development of the NPL would continue the opportunity of stable jobs for citizens of Southwest Wyoming, as well as providing a secure supply of domestic energy for Wyoming and the U.S.A.
1030	Tax revenues from natural gas production are a source of benefit to our Wyoming communities such as schools, highways, law enforcement, public facilities and many outreach programs.
1031	NPL is a complete economic rescue package for the USA. Jobs for Americans. Clean fuel for our automobiles. Clean burning fuel for future generations.
1033	After reviewing the proposal and associated documents on the Normally Pressured Lance Gas Development Project, I must give Encana credit for succeeding in a plan to not only keep the skilled work force from the Jonah Field employed but to keep the economic and tax base in Wyoming from dropping significantly.
1033	With the conclusion of the development phase of the Jonah Field, the NPL Project will keep several hundred skilled workers already living in the area employed as workforce and use the existing Jonah infrastructure as much as possible.
1033	The revenue from these future wells will help federal, state and local tax revenues for thirty years or more.
1036	In terms of the social and economic impacts of this project, I would encourage these areas be given priority consideration when making decisions about the project moving forward.

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1036	In our schools, we have adapted to increased mobile populations of students by providing additional staff and programming to serve them both with academic interventions and academic extensions. The unique needs of our mobile students are being addressed and met with our current staffing and programming. However, if there were to be a "downtime" in the industry, we would have to reduce staff and programs as our funding is dependent on enrollment. When industry returns to the area, it takes a great amount of time to ramp up our programming to meet our students' needs – mostly through recruiting qualified staff to implement our programs. It would benefit our students, our organization, and our communities to have a relatively smooth transition from the Jonah Field to the NPL project bringing stability with population, funding, and delivery of instruction.
1036	Again, I urge you to give every consideration to allowing Encana to proceed with the NPL project without delay allowing for social and economic stability for our schools and communities.
1041	Our firm has been involved in helping develop the Jonah Field over the past decade. The socio-economic impact to our firm has helped support our 32 employees, their families, the community and the local economy. In summary, I again stress the importance of the NPL project to both the direct and indirect benefits for continued viability of our firm and the continued employment of our professional staff.
1041	In addition, development of Wyoming's abundant natural gas resources are important to the revenue and economy of the state, not to mention to the energy needs of the nation as a whole.
1041	One of the concerns continually surfacing with the energy development projects and most likely with the NPL project is the negative effect upon tourism. Tourism is also a major contributor to the state's economy and this area in particular. The proposed location of the NPL project is in an area that is not an attraction for tourism. It lies almost entirely in an area hidden from major highways leading to the national parks in northwestern Wyoming and the primary tourist destinations in the surrounding area.
1044	It will help provide jobs which stimulate our "shaky" economy, stimulate local business, and provide more natural resources.
1045	By doing this more jobs will be around the area.
1045	More money will be flowing through out Wyoming.
1046	The new wells will bring in more money for the County.
1046	It would also create more jobs for people to have.
1047	In conclusion, the ability to produce large amounts of natural gas is a gigantic boost for our economy, and needs to continue to stay that way.
1048	I support clean, domestic energy production that provides jobs and future work for American's
1048	...and lessens our dependency on foreign oil. Natural gas is clean energy and can play a key role in the US reduction of importation of fossil fuels. Wyoming NPL natural gas will help provide an important energy resource for America while reducing our dependence on energy from our enemies abroad.
1050	I believe this project is going to give Sublette County many great opportunities, including jobs for years to come.
1051	The long term revenue's from royalties on gas sales, taxes from all of the job's that will be maintained and created, and the commerce alone that will go hand in hand (fuel, food, hotels, etc) from all of the proposed drilling would help keep Wyoming from following a lot of other states in this country into a recession now and in the future.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1051	This project would help keep a stable economy in Wyoming due to the fact that it would help eliminate the "boom and bust" cycle that is all too common in the oil & gas industry. This would in turn keep stable communities in the area and again help keep revenues up in Wyoming from property taxes. If people and company's leave the area then property values go down along with state, county, and city revenues go down due to the loss of tax payers.
1053	Will the cost affect anyone other than the companies that agree to help.
1054	I am writing in regards to the NPL project proposed by EnCana, and I like this project that EnCana had proposed to Sublette County, because this project is going to create new jobs opportunities and maintain local jobs, and this project it will be good for the state of Wyoming.
1055	With the inevitable decline in production in the Jonah field the project would go a long way to maintain the economic stability in the area. I think that there are a lot of people who have invested a huge amount of their personal resources in an effort to establish their families in Wyoming; maintaining a stable environment in the energy industry is the foundation enabling them to stay here.
1055	My family has benefitted from the taxes that are generated from this industry especially with revenue that our schools receive.
1056	Our farm is richer for the opportunity to use natural gas to better our lives.
1057	They will provide many , many jobs to the residents of SW Wyoming and in the present US situation this is of great importance.
1059	…….and help thru their many charitable donations.
1059	They will provide many , many jobs to the residents of SW Wyoming and in the present US situation this is of great importance.
1061	In addition to maintaining jobs and bringing on much needed additional jobs,
1061	It will assist in the U.S. gaining energy independence. Every molecule of hydrocarbons that can be produced domestically means less money we are sending to countries that do not like us, for their hydrocarbons. Both of these aspects, will be key pieces to the puzzle of solving two of the biggest problems facing America....jobs and energy independence.
1062	This proposed project makes good sense to continue the jobs,……to this area of Wyoming.
1062	This proposed project makes good sense to continue the ...tax revenue and ……to this area of Wyoming.
1062	This proposed project makes good sense to continue the …….natural gas reserves to this area of Wyoming.
1066	We at the Hampton Inn & Suites are hoping for a 3 year smooth transition. It would be an economic devastation for the Pinedale area if Encana has to send workers home for an additional year to year and a half.
1066	We are excited at the prospect of the NPL development offering more long term employment in the area. This equates to a nice boom to local economy which Pinedale needs right now!

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1067	Before any further development is approved, we suggest that an updated socioeconomic analysis be performed. It is important that impacts to the affected environment be fully understood, disclosed, and documented prior to expanded extraction efforts. Sublette County and its residents experienced significant socioeconomic stress and stimulus as oil and gas activity increased in the Jonah Field and Pinedale Anticline Project Area. As detailed in Phases I and II of the Sublette County Socioeconomic Impact Study Reports (Sublette County 2008; Sublette County 2009), effects were felt in housing, social services, public education, traffic, crime and criminal justice, and health care. Public infrastructure was particularly impacted. As of September, 2009, Sublette County and the municipalities of Pinedale, Marbleton, and Big Piney had identified over $71 million of high priority infrastructure projects considered necessary to mitigate the effects of increased energy development (Sublette County 2009). These projects included community water and sewer repairs or replacement, water treatment upgrades, and road repairs and repaving. Although energy operators paid over $1 billion in cumulative tax payments during 2008, Sublette County and its municipalities received less than 6% of these funds, which was and is insufficient to address all the impacts related to energy development (Sublette County 2009). Therefore, we think it is important to (1) quantify new and continuing impacts and the associated costs of any needed mitigation, and (2) identify funding sources for any necessary mitigation activities.
1067	Appendix 3 of the Pinedale RMP (citation) specifically states the following guidelines for socioeconomic mitigation: Mitigate negative effects from growth; it will be necessary to calculate net costs and/or benefits. The BLM/operators will use the population projections developed in Chapter 4, and estimate effects to the counties based on current service and housing levels identified in Chapter 3. Where net effects are negative, the BLM/operators shall identify potential solutions to avoid such effects, or to reduce the impact. Socioeconomic monitoring will follow the Pinedale Socioeconomic Monitoring Plan (6-24-08) developed by Dr. Robert Winthrop. Monitoring reports will be submitted to the BLM and cooperating agencies annually. We request that the BLM provide the baseline data from Dr. Winthrop's Pinedale Socioeconomic Monitoring plan as well as annual updates, and incorporate this information into the NPL EIS.
1067	Additionally, we ask that the September, 2009 high-priority infrastructure project list be reviewed and updated
1070	Also, their commitment to the surrounding communities and the State of Wyoming is, in my opinion, unmatched. In the few years EnCana has been involved in Wyoming, they have demonstrated an extraordinary willingness to give back to our State.
1071	EnCana is a company that has done what they have promised for the State of Wyoming and even gone far beyond expectations. The Project would once again boost the economy and provide many needed jobs in this area.
1072	This project if approved would have many positive effects to the state of Wyoming and should not be denied.

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Comment Document Number	Comment
1076	This field has created significant employment in Sublette and Sweetwater Counties and contributes significant tax revenue for federal, state and local government. Responsible development of the NPL Project will allow stable employment to continue for a considerable period into the future. The bottom line is that this project is good for Wyoming and good for the country as a whole. They produce much needed natural gas for the nation. They provide jobs for Wyoming citizens and tax revenues for federal, state and local government.
1076	I feel the most important factor to be considered is that the existing field is one of the largest natural gas producers in the state. We need to encourage energy companies to produce more domestic natural gas, especially when they have proven in the past that this can be accomplished with minimal impact to wildlife and the environment.
1081	Project will provide continued and steady employment in Sublette County and surrounding areas.
1081	Project will continue to sustain Wyoming's economic position which will enhance future economic development in the state for all citizens.
1084	Encana takes very good care of the land they work and the people who work for them. This project will provide all kinds of jobs now and in the future.
1086	I am writing in reference to the proposal to expand the Jonas field. We all understand the need to become energy independent, but I wish plans like this took a longer time frame. The expand so much so quickly fits the old model of boom and bust. Can this be done in way that is sustainable economically for the long term? I understand the drilling companies like it, but you don't have to travel far in Wyoming to see the sad results of the boom/bust cycle.
1087	I believe that the project will have a significant economic benefit for the region. I believe that the project will help to further develop domestic energy.
1087	I believe that if the project is not allowed to move forward at this time, Encana and other energy companies may decide to pursue development out of Sublette County and even out of the state which will negatively impact our regional economy. And, once these companies have left Sublette County, they may choose to never come back to the area.
1088	I have been a resident of the state of Wyoming for 64 years and have watched the Boom and Bust cycles over this time. To help with our local economy and keep it more stable I feel the NPL needs to happen in a time frame to help everyone. The tax revenues will help keep a constant flow of money into the local communities and state.
1088	I feel that a smooth transition from the Jonah development to the NPL would help keep the experienced work force that now exists.
1089	1) The NPL project will continue to bring long term employment opportunities to Sublette and Sweetwater Counties. Some residents in the surrounding areas do not embrace the growth of the "oilfield" , but one positive factor is it will provide jobs outside of the energy sector (construction, local businesses, etc.). By keeping business "local", it satisfies those residents and makes them more receptive to new people moving and settling into the area. Personally, my husband and I are transplants and have little intention to leave Wyoming. Both of us were not city folk moving to the great wide Wyoming open spaces, but we enjoy the open spaces and that is a contributing factor in our decision to stay. It would be unpleasant for us to have to sacrifice our choice to live here because our careers might be cut.

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1089	2) The communities have already benefited from the tax revenues of previous projects and the Wyoming Communities have seen that in schools, streets, facilities, and various other programs. This project will continue to support and invest in these communities.
1092	In addition, Encana will continue to utilize its Community Investment Program, which provides assistance to local communities affected by oil and gas development.
1092	Wyoming's oil and gas industry contributes significantly to the local, state, and national economy, providing billions of dollars each year in royalties, bonuses, and severance taxes, besides the added benefits of direct capital investment to local economies and high paying jobs. In 2009, Wyoming benefited from over $2.4 billion in tax and royalty revenue from oil and natural gas development.
1092	Timely development of the NPL field will help ensure the State continues to benefit from robust oil and gas revenue. Assuming that the development of one well generates $134,669 in total government revenue,1 the NPL could generate over $47.1 million every year throughout the life of the project.
1092	Oil and gas development supports over 71,000 jobs2 in Wyoming and Encana already employs over 1,100 workers across the state. Assuming that 26.3 jobs3 and $2.3 million4 in labor earnings are created with the development of each well, the NPL project could create approximately 9,205 average job equivalents (AJEs) and $805 million in earnings each year.
1094	It is important to keep in mind that there is an economic multiplier effect for each new energy industry job created in an area. EnCana projects it will add one full-time employee for every 20 – 25 wells it drills. The NPL Field could reach 3,500 wells meaning that EnCana could hire 150 – 175 local long term employees. A 2008 study conducted by Booz Allen Hamilton Consulting for the Wyoming Heritage Foundation concluded that for every $1.00 in salary and benefits cost in the energy industry, another $1.57 of indirect earnings is created for others in the community. If these newly created EnCana related jobs come to fruition and the salary and benefits cost is $10 million annually, then an additional $15,700,000 of indirect earnings will be created in Sublette and Sweetwater Counties. The probability of this positive economic impact is enhanced significantly if EnCana can move in a timely fashion from the Jonah Field to the proposed NPL Field.
1094	EnCana has demonstrated it is a responsible and generous member of the western Wyoming community in both Sublette and Sweetwater Counties. I am Chairman of the Pinedale Fine Arts Council and am on the Board of the Sublette County Library System. EnCana has supported these and many other organizations in western Wyoming. If they continue to create economic value in our region, then they will be positioned to continue their support of numerous human service organizations in our area. This makes western Wyoming a better place to live for all of us in both the private and public sectors.
1097	Tourism, hunting/fishing, outdoor recreation and wildlife viewing depend on this federal land for truly sustainable jobs.
1100	The last few years the United States has suffered a tremendous blow to the economy while Wyoming has survived rather well; thanks to our natural resources. We need to keep drilling to help the U.S. out of this recession and keep the price of Natural gas low. If we were to stop all together like some "Groups" want us to, it will make matters much worse in the future.
1101	The economic provision that our company provides to the surrounding counties is outstanding and is an added value to the energy source we provide to our customers, the great state of Wyoming, and also to our country.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1103	Developing domestic resources is very important for our national security, economic development, and quality of life. The Jonah Field and Normally Pressured Lance Project are wonderful blessings for Wyoming, if the development truly serves the people. The Wyoming Constitution 97-1-030 states: “Corporations being creatures of the state, endowed for the public good with a portion of its sovereign powers, must be subject to its control.” WY Constitution 97-10-002 states: “All powers and franchises of corporations are derived from the people and are granted by their agent, the government, for the public good and general welfare, and the right and duty of the state to control and regulate them for these purposes is hereby declared. The power, rights and privileges of any and all corporations may be forfeited by willful neglect or abuse thereof.”
1103	I look forward to increasing domestically produced resources in a responsible and efficient manner. Capturing waste heat and recycling it into electrical energy can improve our economy, reduce pollution, expand our tax base, and providing good jobs.
1104	Also, the project proponent should discourage "squatting" (e.g., tent and trailer camping) on public lands through the construction period.
1107	Natural gas production on the public lands also provides important revenue to the state, local, and regional economies. Development of one natural gas well can yield hundreds of thousands of dollars that are paid to governments and reinvested in the local community. Production of natural gas provides revenue to county, state, and federal governments through royalties and taxes.
1107	Furthermore, development of the natural gas resource will require increased employment and result in substantial economic investments in the local economies. This project can continue to provide stable employment to SW Wyoming.
1107	The Encana Community Investment Program can also provide assistance. These economic benefits are considerable and must not be discounted.
1107	While the national economy has recently slowed, areas home to natural gas development such as Wyoming have continued to enjoy robust economic growth. Natural gas production from the NPL Project will contribute to this growth by generating significant revenue for the national, state, and local economies.
1107	In the analysis of potential impacts in the NPL Project EIS, BLM must include an analysis of the economic effects of the project. In particular, BLM must evaluate the beneficial impacts of the revenues the federal government, State of Wyoming, and Sweetwater County will receive from royalties and taxes on production. BLM should also assess the impacts from the NPL Project on the local and regional economy from the creation of additional jobs, additional sales of materials, and increased tax revenue from sales taxes. Currently there are over 1,100+ people employed by Encana operations across Wyoming.
1107	Similarly, BLM must also analyze adverse economic effect of overly restrictive management alternatives. BLM should explain how overly restrictive management of the NPL Project may lead to decreased development, which negatively impacts the local and regional economy through decreased royalty revenue, decreased tax revenue, and the creation of fewer jobs.
1107	Furthermore, continued natural gas development in the NPL Project Area will help ensure a stable local economy through consistent employment and steady royalty and tax revenues.
1108	12. Realistic assessments of the potential employment in the area. Currently the man camps on BLM lands support many of the workers who work on and off shifts and live out of state, so the direct benefits of the "jobs" does not result in monies into the local economy.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1112	The NPL project is going to be very beneficial to the communities in the County and will also benefit people in the State of Wyoming.
1112	Hopefully this process can be completed timely so Encana stays in the area and keeps people employed.
1114	Oil and gas development is a major contributor to economic growth in southwestern Wyoming.
1114	NPL development would provide continued long term stable employment to residents of Sublette County and surrounding areas.
1114	NPL development would help support sustainable communities in southwestern Wyoming.
1114	NPL development would build efficiently upon existing Jonah infrastructure and leverage existing Jonah development technologies.
1114	A smooth transition From Jonah to NPL would help reduce the "boom and bust" cycles of employment/unemployment seen in other areas.
1114	More than I, I00 people are currently employed by Encana operations across Wyoming.
1114	Stable jobs will continue to be created as a result of continued development in the area.
1114	Tax revenues from oil and gas production benefit Wyoming communities in many ways including: schools, highways, law enforcement, public facilities, family assistance, and outreach.
1114	The Encana Community Investment Program helps strengthen Wyoming Communities through grants and other forms of financial assistance.
1115	There is always the argument of the number of jobs provided with all the projects. I don't think the number of jobs (temporary most) can justify the damage that is done and left after the projects are completed.
1117	It will be very good for the State of Wyoming. It will be very good for Sweeetwater & Sublette counties, it will be very good for my family.
1118	A project, like the one proposed here, is an excellent way to help not only Wyoming but our whole country return to prosperity. As an energy company operating in Wyoming, Encana's project is a win/win situation for this state and the whole USA. We need to be energy independent and the state of Wyoming is blessed with an abundance of natural resources. Effective harnessing of these resources is the answer to helping resolve the current economic crisis in numerous ways as discussed in my comments.
1118	This project will help retain the skilled work force currently employed in the Jonah Field and help maintain the employment so badly needed during this current economic crisis...
1118	…….in addition to maintaining the necessary tax revenue far into the future.
1119	The NPL will keep good jobs in the Pinedale area and ……
1119	…..result in a plethora of revenue for the state and the immediate area surrounding the NPL.
1121	Continued access to energy and mineral resources associated with public lands is paramount to the well being of County residents and its economy, the state of Wyoming, National Economy and Security.
1121	Continued access to energy and mineral resources associated with public lands is paramount to …….. National Economy and Security.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1121	Support waivers of seasonal restrictions to avoid annual boom-bust cycles that concentrate construction, traffic, and influx of temporary workers during the tourist season and stress county and local government services; The project area includes some crucial big game winter range and raptor areas. Our experience during the last 12 years is that the seasonal restrictions have significant adverse environmental impacts. They concentrate development during seven short months, thus increasing the intensity of the impacts. Because most tourism occurs during the same time, this increases traffic, air emissions, dust, and resulting haze. The seasonal restrictions also make it impossible to attract and keep permanent workers. Providing local government services for a temporary work force also result in adverse environmental impacts, in terms of housing, motor vehicle traffic, and related social services. The long-term impacts of seasonal restrictions to the communities are equally adverse. Where development is year-round, permanent homes yield a predictable revenue flow from property and sales taxes. As one example, Wyoming oil and gas revenues are in part distributed based on the number of school children. When workers are only needed for 7 months, families do not move into the area and impact dollars do not find their way into the local school systems. Other impact doI1ars are distributed based on residents and again temporary workers are not counted. Nevertheless, the local governments must still provide law enforcement, medical and other services for the temporary workers. These services must be available year-round even when the peak needs fluctuate.
1124	As drilling continues to decline in the Jonah Field, transitioning work to NPL would keep in place jobs already created and provide more than 875 full time jobs over the life of the project.
1124	NPL would also generate a steady and reliable tax revenue for city, county, state and federal governments
1124	NPL would also provide long-term well paying jobs, be a boon to all the ancillary businesses that go along with big drilling project and contribute to the tax base of Wyoming and the federal government.
1125	Currently Encana and other oil field development companies operating within the Jonah field support over 100 oil and gas field service companies within Sweetwater and Sublette Counties. These service companies employ approximately 5,000 employees and generate millions of dollars of revenue for these Counties and the State of Wyoming. The survival, of these service companies and the employment they provide, depends on continued oil and gas exploration provided by actively operating oil and gas rigs within the Jonah Field.
1125	With the projected decline of drilling in the Jonah Field, to almost a non- existent level by 2015, there is a great risk that the Jonah Field oil and gas rigs will soon begin leaving Southwest Wyoming and the State. If this happens, the jobs and revenues supported by these rigs will be lost creating economic hardship for Sweetwater County, the Southwest Wyoming region and Wyoming.
1125	This will enhance and maintain the significant portion of the economic base of Sweetwater County (Please see attached graphic.).

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1125	In support of expediting the BLM's environment review, we have attached an appendix that lists of other Sweetwater County issues and concerns that the Board encourages the BLM consider in their review of the NPL Project."Appendix"- Summary County Issues Related to the NPL Project - Date Mayi.9, 2011 " The purpose of this "Appendix" is to provide the BLM a summary of issue besides the economic issue addressed in the attached letter, which are important to Sweetwater County in the development of the NPL Project.
1125	Intergovernmental Cooperation: Sweetwater County Comprehensive Plan - 2002 encourages cooperative interaction between local, State and Federal agencies. With this goal in mind, Sweetwater County encourages Encana to continue their proactive efforts to educate and solicit comments from all potentially affected communities, especially the unincorporated communities Sweetwater County of Eden and Faison, and the incorporated communities of Green River, Rock Springs, Granger and Superior. Community concerns that should be considered include: housing, school capacity, traffic patterns (especially for heavy equipment and supplies being transported through communities), law enforcement, health service and other public services.
1126	The economic benefits of this project are significant. Without it, and continued natural gas development, both Wyoming and Sublette County in particular would suffer irreversible economic hardships. Please note the following: ' - 'The Wyoming legislature increased' biennium spending {through'June;30 2011) by, $250 million. (13%)(to meet government and citizen needs): Encana's state severance and royalty payments were --$162 million in 2010 - arguably 65% of the $250 milli0n. - Sublette County's total assessed value of $3.5 billion for 2010 represented 16% of the state's total The county's valuation has alternated being number one or two with Campbell County for the past decade. - The county's assessed valuation IS over three times greater than Cheyenne/Laramie County and Casper/Natrona County.
1126	Sublette County has the lowest employment rate in the state - 3.9%. - Historic and potential drilling activity in Jonah (and for NPL) is revealing. The current well count is steady 2010-2013, but declines sharply in 2014· 2015 for Jonah. The NPL wells pick up the slack and provide for robust and steady activity for 2013-2014 .. which translates into steady employment.
1128	Agriculture, forestry, fishing and hunting, and mining are the dominant industrial category categories of employment in the Sweetwater County, with 21.9% of the workforce. The EIS needs to use updated census data. Even though most of the United States is struggling to recover from the 2008 crash, Wyoming reports a 2.1% growth. May 17, 2011 Casper Star Tribune.
1128	The revenues received by local government are limited to sales tax with the vast majority of the project revenues being paid to the state. The discussion of severance taxes and federal mineral royalties should describe the statutory allocation of these revenues in Wyoming, particularly the limited amounts of revenue that directly flow to city and counties from the federal royalties and rent payments. The state dedicated funds to assist the local government entities are limited to capital projects and school children, thus not providing funding for the broader range of local government services. This is a critical point for local governments that many BLM NEPA documents do not accurately reflect. Many of the natural gas workers will be temporary, due to seasonal restrictions and weather, thus also affecting the communities. Counties also do not receive a direct share of Wyoming severance tax revenues which are statutorily dedicated. If no additional employees, then no additional sales tax or lodging tax revenues.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1128	Counties also do not receive a direct share of Wyoming severance tax revenues which are statutorily dedicated. If no additional employees, then no additional sales tax or lodging tax revenues. If there is no change in the number of employees, as originally proposed, then housing or rental income will not show economic gains. If the project does involve additional or new employees, then the EIS needs to address the pressure on other county housing and motels. Tourism is also an important part of the local economy. When the construction season occurs during the summer peak tourism season, then construction will displace tourists since there are a finite number of hotel and motel rooms and space in the restaurants.
1128	Operator tax payments do not increase due to road impacts caused by the project, nor are operator taxes paid to local governments. Taxes are paid to the state and are not returned to the affected county on any direct or proportional basis.
1129	The BLM must include an analysis on the impact to local and regional ..... and businesses that depend on the coldwater fisheries within this region. Any impacts to water quality in this high quality watershed would not only significantly affect native and wild trout in these stream reaches, but the local and regional recreational use and businesses depending on these rivers.
1130	· Research the state of Wyoming's Department of Tourism data to consider the implications for loss of that economy.
1132	Natural gas production in the NPL Project Area increases domestic energy resources, provides an alternative to energy sources with high carbon emissions, and provides sources of revenue to stimulate the local and national economies.
1132	Finally, natural gas production from the NPL Project will benefit the national, state, and local economies. Development of one natural gas well can yield hundreds of thousands of dollars that are paid to governments and reinvested in the local community. Production of natural gas provides revenue to county, state, and federal governments through royalties and taxes. Furthermore, development of the natural gas resource will require increased employment, and the Operators will make substantial economic investments in the local economies. Although the national economy has recently slowed, Wyoming's economy has remained strong primarily due to natural gas development. See, e.g., Michael A. Fletcher, Houston's Pipelines of Prosperity: In Oil Industry Hubs, High Energy Costs Bring More Growth than Pain, Wash. Post, June 23, 2008, at AOI. Encana's proposal to develop as many as 3,500 wells in the Project Area will substantially contribute to the national, state, and local economies.
1132	The NPL Project EIS must include an analysis of the economic effects of the project. This analysis should begin with a historical perspective of land use in the NPL Project Area and a discussion of how oil and gas development has facilitated economic growth. This description would provide a baseline to assess current economic conditions and how future development scenarios would affect the local and regional economy. From this information, BLM can best analyze the beneficial economic impacts that will result from the NPL Project.
1132	In this analysis, BLM must evaluate the beneficial impacts of the revenues the federal government, State of Wyoming, and Sublette and Sweetwater Counties will receive from royalties and taxes on production. Furthermore, BLM must analyze the beneficial impacts to public services that depend on tax revenues generated by oil and gas operations, such as public school districts. BLM must also analyze the impacts from the NPL Project on the local and regional economy from the project's demand for additional goods and services, which results in the creation of additional jobs, additional sales of materials, and increased tax revenue from sales taxes.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1132	Just as the NPL Project EIS must analyze the project's economic benefits, it must also analyze adverse economic effect of overly restrictive management alternatives. BLM must explain how overly restrictive management of the project may lead to decreased development, which negatively impacts the local and regional economy through decreased royalty revenue, decreased tax revenue, and the creation of fewer jobs. The NPL Project EIS can ensure a smooth transition of jobs from the Jonah Field
1132	Timely approval means a smooth transition of our existing workforce from our current operations in the Jonah Field to NPL Project operations. The transition and a timely approval helps to continue to support communities, Wyoming's tax revenue and stable, local jobs.
Soil	
1099	The EIS needs to analyze alternatives which minimize the amount of surface disturbance and topsoil removal. ……and vegetation should be mowed rather than bladed to minimize soil disturbance.
1099	Soils which remain in place, even when compacted, can often be reclaimed more quickly and successfully than soils which have been removed and replaced. The BLM should consider analyzing the feasibility of using mats or similar techniques to reduce temporary surface disturbance.
1121	Pave roads when they serve more than five well sites to reduce soil erosion and dust; Experience with other gas field developments shows that development can have significant dust and erosion impacts. BLM Gold Book calls for building the lowest standard road possible. Where a road serves several wells, the road needs to be paved to ..... reduce erosion.
1128	BLM should provide for immediate site stabilization based on onsite soil analysis, weather, slope and slope aspect. Straw, wood chips and jute mats should be used. Erosion and sedimentation would be controlled by promptly stabilizing and revegetating the areas around the well pads in the fall or spring season following completion, and by providing surface water drainage controls, such as berms, sediment collection traps, diversion ditches, and erosion stops, as needed.
1128	A site soil analysis should precede soil removal to determine the proper amount to be removed.
1128	The EIS should also provide that if construction operations allow, Operators would use topsoil live haul, which is the direct placement of freshly salvaged (not stockpiled) topsoil onto graded overburden in another area of operation. Live-haul of salvaged soil eliminates the problems of stockpiling. Consequently, deteriorating fertility, micro-flora, and seed viability are avoided.
Special Status Species	
1010	3. Porous dumpsters (metal screens around frame) allow ravens to pull out trash, meaning more food = more ravens. Ravens eat sage grouse eggs and every location provides unnatural perches from which ravens can look for nests.
1029	In fact, there should be at least 3 miles between well sites and sage grouse leks which, as you know, are critical to breeding and nesting.
1040	Sage grouse is the most obvious animal that will be affected, but all other animals in the area will also be affected. How will EnCana protect these animals?
1043	Also, I think that the surface disturbance should not dramatically affect wildlife such as the sage grouse because they are an important part of the environment.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1049	I would like to see more environmental projects that include all of the following: ……..and wild life studies. As for the sage grouse I think we should drill away from their nesting areas only about 2 miles away from the sage grouse so we don't lose our wild life as well.
1052	The sage grouse population: I am an avid Wyoming sportsman and the dwindling sage grouse population worries me. I would like to make sure that newly proposed NPL will decrease the already suffering population even further. It is very important to me that EnCana not kill the sage grouse before I get the chance to.
1064	As a result, conservation actions should be taken within sage-grouse habitat and guidelines outline by the WYG&FD should be followed.
1067	To ensure continued nest success for greater sage-grouse and avoid federal listing more restrictive than the present Candidate status, please consider in one alternative implementing the Wyoming Game and Fish Department-recommended 2.0 mile No Activity zone (2008) buffer for all leks or concentrations of leks
1068	If not then only the most environmentally advanced techniques should be allowed including the following. EnCana's Normally Pressured Lance Project sprawls across a vast stretch of prime wildlife habitat, including key sage grouse areas and the internationally famous pronghorn migration corridor from Grand Teton NP to Seedskadee NWR. Given the massive impacts to sage grouse and big game that have already been shown in the Pinedale Anticline and Jonah Fields, the needs of wildlife--not oil and gas companies--should take precedence here.
1068	And within sage grouse Core Areas, well pads need to be sited at least 3 miles from sage grouse leks in order to reduce impacts to breeding and nesting activities.
1077	Within sage grouse core areas well pads need to be sited a minimum of three miles from sage grouse leks.
1079	A condition for development that should accompany any permit to drill ought to maintain a minimum of 3 miles distance from any sage grouse lek.
1080	Additionally, the sage-grouse is at the verge of ESA listing and this could be the tipping point resulting in drastic changes to development practices statewide.
1082	The southern half of the project area has been designated as a sage grouse Core Area,..
1085	Sage grouse will be further impacted by the enormous land grab for this proposed project.
1090	When considering this project it is imperative to consider the needs of wildlife, particularly sage grouse and ……. Sage grouse in Wyoming are particularly under stress and are still on the decline. In fact, sage grouse should probably already have a greater protected status than they do now.
1090	As you consider this project, please focus on separating well pads by a square mile to over three square miles or more, taking into account known locations of sage grouse leks and pronghorn migration routes.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1093	Much of the proposed project area is designated as sage grouse core area, with a number of mapped sage grouse leks in the project area. The BLM must ensure compliance with the State of Wyoming's Governor's sage grouse Executive Order (EO 2010, August 18, 2010). The EO requires that surface disturbance in core areas not exceed five percent of suitable sage grouse habitat per 640 acres. The BLM must also comply with the Wyoming Game and Fish Department (WGFD) Stipulations for Development in Core Sage Grouse Population Areas, as well as its own Instruction Memoranda WY 2010-012, 2010-013, and 2010 071, which limit energy production locations to no more than one per 640 acres and disturbance of sagebrush habitat to no more than five percent of those same 640 acres. Given that the BLM is currently amending Resource Management Plans (RMP) for the Pinedale and Rock Springs areas related to sage grouse conservation, it would seem appropriate to wait until those sage grouse RMP amendments are finalized before making any decision related to the proposed project.
1095	The Upper Green River Valley has already been impacted by the Pinedale Anticline and Jonah Fields two of the most intensive oil and gas fields in Wyoming. The result of these two projects is that sage grouse within their boundaries are declining markedly, and were expected to be extirpated by 2024 if conditions remained at 2005 levels (Holloran 2005). Conditions for sage grouse have not stayed the same, however; they have continued to deteriorate as more than 1,000 additional wells have been drilled in the Jonah Field since that time with hundreds more drilled in the Pinedale Anticline.
1095	It appears that EnCana is willing to limit surface disturbance to one well pad per square mile in sage grouse Cores Areas, an admission that this level of well clustering is feasible for the project. Since there is no difference geologically between Core and non-Core lands, the logical question then becomes, 'Why should BLM permit EnCana four surface locations per square mile outside Core Areas when one well pad will get the job done?' While Core Areas contain the best sage grouse habitat for this particular project area, they do not encompass all of the sage grouse habitat, and sage grouse would benefit from capping the surface density to 640-acre spacing outside Core Areas, too. In addition, a myriad of other BLM Sensitive Species are be expected to be present in non-Core lands of the NPL project area – pygmy rabbit, sage sparrow, sage thrasher, Brewer's sparrow, ferruginous hawk, and white-tailed prairie dog, to name a few. Fewer surface locations mean a smaller mileage of roads and pipelines, less habitat fragmentation, less dust pollution, less acreage of disturbance to wildlife, regardless if they are avoiding lands within 0.5 mile of roads, like elk, or within 100m of roads, like sagebrush obligate songbirds.
1095	Sage grouse. The sage grouse is declining range wide, and local studies in the Upper Green River Valley have shown that this species is heavily impacted by oil and gas development. Holloran (2005) found that not only do well densities greater than 1 well site per 699 acres have negative impacts on breeding populations at lek sites, but also that producing wells within 1.9 miles of a lek and well drilling activity within 3.1 miles of a lek also depressed lek populations for grouse. In addition, this study documented that oil and gas activity resulted in the depopulation of developed areas and that nesting sage grouse hens tended to disappear over time from developed areas. With this in mind, well pad density should be capped at no greater than one well per square mile throughout the project area, and surface disturbing activities should be prohibited within 3 miles of active or recently active sage grouse lek sites.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1095	White-tailed prairie dogs. White-tailed prairie dogs have declined markedly in the Upper Green River Valley over the course of recent decades, and remaining active prairie dog colonies should be zealously protected by BLM so that their recovery and expansion to historical levels can occur. Not only are they BLM Sensitive Species, but they are also a keystone species upon which many other types of sensitive wildlife (such as mountain plover, burrowing owls, and ferruginous hawks) depend to a significant to almost total degree. Prairie dog colonies need to be mapped and population trends should be established in the forthcoming EIS to fulfill NEPA baseline information requirements, and mitigation measures should be applied preventing road construction or well development within ¼ mile of active colonies, and preventing powerline siting within ½ mile of active colonies.
1095	Mountain plovers. BLM should map occurrences and nesting habitat for mountain plovers within the project area and avoid the development of roads or well pads within ½ mile of identified nesting habitats. Roads and well pads may become population sinks for mountain plover, which can be attracted to these as feeding sites to be killed by collisions with motor vehicles.
1095	Pygmy rabbits. BLM should survey the project area for population size and trend as well as occurrences of burrows and scat in order to satisfy baseline information requirements. Identified pygmy rabbit habitat should be avoided by at least ¼ mile for the purpose of well siting, and the continuity of suitable pygmy rabbit habitat (i.e., tall sagebrush along draw bottoms and in other localities) should be maintained in an unfragmented state: road systems should be designed to minimize the number of crossings of pygmy rabbit potential habitat. This species is heavily affected by habitat fragmentation by roads, which may present complete barriers to movement, dispersal, and breeding connectivity.
1095	Rare plants. The project area should be surveyed for rare plants (BLM Sensitive, or labeled G1, G2, G3, S1, or S2 by NatureServe or the Wyoming Natural Diversity database). Mitigation measures should be put into place to prevent surface disturbance from destroying or reducing rare plant occurrences, or promoting an increase in dust pollution that would have an adverse effect on plants occurring directly adjacent to roads or well pads.
1096	And within sage grouse Core Areas, well pads need to be sited at least 3 miles from sage grouse leks in order to reduce impacts to breeding and nesting activities.
1097	Additionally this area is critical to a declining sage grouse population.
1098	Within sage grouse Core Areas, well pads need to be sited at least 3 miles from sage grouse leks to ensure reduced impacts to breeding and nesting activities.
1102	Recent scientific information including, but not limited to, ... Holloran, Naugle, Kaiser, and Lyons work on sage grouse, ... and any new information that has been developed since the authorization of the Jonah II project decision that overlaps with the Normally Pressured Lance boundary.
1102	Inclusion of the Wyoming core sage grouse strategy, Western Association of Fish and Wildlife Agencies evaluation of sage grouse ..... including the recent listing decision from the U.S. Fish and Wildlife Service, as well as, specifics of how the Wyoming Game and Fish Department population objectives and strategies for wildlife published in the Comprehensive Wildlife Conservation Strategy are going to be achieved.
1102	Clear and accurate identification of migration routes ....., any winter range and parturition areas ..... and sage grouse and all actions that will be implemented to maintain functional migration routes and seasonal wildlife ranges.
1103	The pronghorn migration route must be protected, as well as the core sage grouse areas.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1104	The majority of the NPL project area lies within suitable sage-grouse habitat. There are currently 8 known, occupied sage-grouse leks and I known, unoccupied sage grouse lek within the NPL project boundary. Approximately one-third of the NPL project area (southeast side) is within the Greater South Pass sage-grouse core area where 5 of the known, occupied leks exist. Additionally, there are identified sage-grouse winter concentration areas in some portions of the PL project area. In cooperation with the Pinedale BLM Field office we are continuously updating winter concentration maps, as new data have been collected since 2008 when the previous map was originally developed. This updated map of winter concentration areas should be available by the fall of 20 II.
1104	Development, production, and maintenance activities on sage-grouse lekking, nesting, brood-rearing, and winter habitats.
1104	and exhaust stacks should be pointed away from any sage-grouse leks.
1104	Compressor stations should be located far enough away from leks so that noise does not interfere with breeding activities (a minimum of v..-mile is recommended in noncore areas).
1104	Compressor station doors should be kept closed to reduce noise. To minimize the effects of continuous noise on sage-grouse and nongame bird populations, reduce noise levels to 49 dBA or less, particularly during the bird nesting season when aural cues are critical for successful breeding.
1104	We recommend that the general and oil and gas-specific stipulations and procedures outlined in the State of Wyoming Greater Sage-Grouse Core Area Protection Executive Order 2010-4 be incorporated into the alternatives.
1104	In sage-grouse non-core areas we recommend the proponent avoid surface disturbance activities and occupancy (NSO) within 0.25 mile of the perimeter of occupied sage grouse leks and avoid surface disturbing activities in suitable sage-grouse nesting and early brood-rearing habitat within 2 miles of an occupied lek or within identified nesting and early brood-rearing habitat from March 15 - June 30.
1104	Where is has been designated, avoid human activity in sage-grouse winter habitat from November 15 - March 14.
1104	The northern leopard frog, which has been petitioned for listing by the USFWS, is also a species whose range and distribution may extend into the proposed project area.
1105	This project will complete the destruction of the sage grouse, ……. migration corridors already impacted by current drilling activities, and …….
1105	I recommend a maximum density of one well pad for each ten square miles, and a minimum 5 mile distance to sage grouse leks and migration corridors, not only for well pads but also for new roads.
1106	EnCana's Normally Pressured Lance Project cannot help but impact wide stretches of our prime wildlife habitat. Like everyone, I am well aware of sage grouse declines ..... The Pinedale Anticline and Jonah Fields have clearly had a significant impact on our wildlife and government action should err on the side of wildlife protections versus desires of the oil and gas companies.
1106	siting well pads far away (3+ miles) from sage grouse leks to reduce impacts during breeding and nesting,

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1109	Utilize Best Available Science We request that BLM utilize the latest and most informed sage-grouse scientific data and study results from projects conducted in the Upper Green River Basin to carry out appropriate and responsible sage-grouse management. Best available science indicates that, "yearling males tended to avoid leks highly immersed into developing gas fields."1 This study was conducted by Rusty Kaiser, now a BLM biologist in the Pinedale BLM Field Office. BLM has the in-house expertise to fully inform responsible sage grouse management which it should not hesitate to call upon.
1109	"Hens captured on the disturbed leks demonstrated lower nest initiation rates, traveled twice as far to nest sites, and selected higher total shrub canopy cover and live sagebrush canopy cover than hens captured off of undisturbed leks."2 "Greater sage-grouse in western Wyoming appeared to be excluded from attending leks situated within or near the development boundaries of natural gas fields. Declines in the number of displaying males were positively correlated with decreased distance from leks to gas-field related sources of disturbance, increased levels of development surrounding leks, increased traffic volumes within 3 km of leks, and increased potential for greater noise intensity at leks. Displacement of adult males and low recruitment of juvenile males contributed to declines in the number of breeding males on impacted leks. Additionally, responses of predatory species to development of gas fields could be responsible for decreased male survival on leks situated near the edges of developing fields and could extend the range-of-influence of gas fields. Generally, nesting females avoided areas with high densities of producing wells, and brooding females avoided producing wells. This suggests that the long-term response of nesting populations is avoidance of natural gas development."3 Scientific studies noted above indicate that development at a density of no more than one well per section throughout the NPL field is the only way to prevent local extirpation of sage-grouse, as apparently has happened in the Jonah Field. We therefore request that BLM require no more than one well per section, not only in Core Sage Grouse Areas, but throughout the NPL field to help prevent listing under the Endangered Species Act. This is important to retain landscape-scale use by sage-grouse, by preserving connectivity between all areas that sage-grouse require for population maintenance and enhancement.
1109	We request that sage-grouse winter areas be assessed and mapped, and that these areas be avoided by field development and infrastructure to prevent important sagebrush habitats from being fragmented, especially since it appears that wintering sage-grouse have likely been pushed out of the Jonah Field to the Mesa area of the Pinedale Anticline field. Together with impacts from the LaBarge infill, the NPL area of the Little Colorado Desert may be one of the last winter strongholds for grouse in the Upper Green.
1109	We request that within the entire NPL area, leks be afforded a three-mile NSO buffer that also extends to leks that are within three miles of the NPL boundary.
1109	We request that within the entire NPL area seasonal stipulations be applied for nesting sage grouse, and that waivers of seasonal stipulations be denied.
1109	We request that a true baseline for noise in the NPL area be monitored and a limit be established by BLM throughout the NPL field, as it applies to all sage-grouse annual life cycles. Current noise standards for humans are inappropriately applied to sage-grouse, and there has not been a true noise baseline established using on-the-ground monitoring anywhere in the Upper Green River Basin.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1109	We request that noise impacts to sage-grouse be thoroughly examined, and the effects of noise from energy exploration and development on the breeding biology of the greater sage-grouse be established. We understand that Gail L. Patricelli, Assistant Professor, at the University of California, Davis has begun this work, but results have not been established nor published.
1109	According to the range-wide Conservation Assessment of Greater Sage-Grouse and Sagebrush Habitats (Connelly et al. 2004), sage-grouse have declined across their range during the past 50 years, as has the quality and distribution of the bird's requisite sagebrush-steppe habitat. Since it appears that Encana's operations in the adjacent Jonah Field have resulted in the local extirpation of sage-grouse there, and because the U.S. Fish & Wildlife Service will decide whether to list the greater sage-grouse as an Endangered Species in the next few years, a habitat conservation assessment should be conducted, and the results made publicly available.
1109	Following a habitat conservation assessment, general area maps showing important sage-grouse habitats, population monitoring, and trends should be published at the BLM website to keep the public informed. Habitat mapping will help area wildlife managers make more informed decisions on which habitats should be avoided and/or where additional stipulations may be applied.
1113	Within sage grouse Core Areas, site well pads at least 3 miles from sage grouse leks.
1118	Encana's ability to utilize an existing workforce and infrastructure makes this project far more appealing over other new ventures requiring more land disturbance, environmental impact and more costs.
1123	Furthermore, the BLM must also comply with its own Instruction Memoranda (1M), IMs WY-2010-012, WY -20I0- 013, and 1M 2010-071. IM WY -2010-012 provides that, among other things, in core areas there shall not be more than one energy production location per 640 acres and that disturbance is not to exceed five percent of the sagebrush habitat in those same 640 acres. And of course the BLM is preparing an RMP amendment for both the Pinedale and Rock Springs Field Offices relative to sage-grouse conservation. The requirements in all of these documents should be met as condition of approval for the NPL Project.
1123	The provision in IM WY-201 0-012 that disturbance not exceed one energy production location per 640 acres may have special significance. In the Federal Register notice announcing this project, the BLM states there could be "four 18-acre multi-well pad locations per 640 acre section of land." 76 Fed. Reg. 20,371 (April 12, 2011). This would appear to violate the provision in IM WY-2010-012 that there be no more than one energy production location per 640 acres, as well as the five percent habitat/sagebrush destruction limitations in both the 1M and EO. We ask that BLM ensure that this project be constructed with no more than one energy production location per 640 acres in sage grouse core areas, as its Instruction Memorandum requires, and that all provisions in the IMs, EO, and Wyoming Game and fish Department stipulations document be complied with.
1123	As discussed above, for example, allowing four well pads per section would not be in conformance with sage-grouse protections limiting development to one well pad per section, so it is apparent more must be done to minimize impacts in this regard. No more than one well pad per section should be permitted if impacts are to be minimized.
1124	A core area concept will be used to protect sage grouse and by using directional drilling, the impact on wildlife is minimized.
1126	.:. Sage grouse core areas protection will take place;

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1128	The EIS must also address the proposed action's impacts on sage grouse. BLM needs to adequately explain how the project's sage grouse protection measures are sufficient, especially in light of the recent litigation settlement in which DOI committed to either listing or making an unwarranted determination by 2012.
1128	The EIS should disclose and analyze whether the proposed action will conform to the current sage grouse management guidelines.
1128	The EIS discuss or identify sage grouse populations or population trends.
1128	To what extent is the proposed action consistent with pending candidate conservation agreements.
1128	The EIS must address the wolf management and impacts, if any, on the wolf.
1129	The impacts of alterations in river flows on endangered and threatened species must be assessed. This is of particular concern with respect to the Endangered Fish Recovery Implementation Program for which major efforts have already been incurred in the Colorado River Basin. Given the position of the Green River and its tributary, the New Fork River, at the upper end of the Colorado River system, changes in water quality and quantity can have ramifications for reaches of the Colorado River well below the affected area.
1129	Sage grouse habitat occurs within the proposed project site. At one time, the area which the Jonah Field now encompasses was considered a prime sage grouse habitat area. The BLM must not allow natural gas development to occur in the manner and to the level that occurred on the Jonah, which resulted in the loss of sage grouse within the area.
1129	In addition, the BLM must comply with the sage grouse core conservation measures developed by the sage grouse working groups, the US Fish and Wildlife Service, and the Wyoming Game and Fish Department.
1130	The Greater sage grouse is listed as a candidate species under the United States Fish and Wildlife Service (USFWS) and sensitive by the Bureau of Land Management (BLM). This species resides in the proposed project area and is part of Wyoming's core habitat area. As a BLM sensitive species, also known as a candidate species, the BLM Manual 6840.12 requires the agency to implement management plans that conserve candidate species and their habitats to ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for the species to become listed. In accordance with BLM Manual 6840, the Greater sage grouse is to be managed "to promote their conservation and to minimize the need for listing under the Endangered Species Act. It is imperative that fragmentation and degradation…not continue to the point that sustainable sage-grouse populations can no longer be supported." (US Dept. of Interior, March 5,2010, Instruction Memorandum No. 2010-071).
1130	Avoid migration corridors, leks, brooding grounds, and stop over points when determining where to place well pads, roads, and support infrastructure. Animal displacement is a real possibility when developing 3,500 wells within big game and Greater sage grouse habitat.
Stakeholder Involvement	
1067	Further, the Sublette County Commissioners encourage annual meetings to address public concerns.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1067	It is also important for the BLM to recognize stakeholder fatigue, especially for Sublette County residents that are often faced with the challenges associated with oil and gas development. Therefore, please continue to involve the public during the course of the project. We suggest that Encana consider funding a community liaison that will assist with minimizing stakeholder fatigue throughout the NEPA process. This can be accomplished in part by providing education on the benefits and risks associated with energy development.
1069	By continuing to encourage positive yet diverse discourse, the generation of new ideas through brainstorming, and the genuine commitment to working towards positive solutions, the public, the BLM, and Encana ought to be able to work together for the benefit of all.
1083	As this project goes forward, we ask that AHW be considered an interested party for all consultations under Section 106 of the National Historic Preservation Act (NHPA) as amended, and implementing regulations 36 CFR 800.2(c)(5) and 800.3(f)(3).
1083	AHW looks forward to working with you should this project be allowed to proceed which, as stated above, we sincerely hope will not be the case.
1099	We look forward to working with the BLM as cooperators on this project.
1121	Lincoln County looks forward to working with BLM on this project.
1128	Similar to what CLG has recommended for Creston-Continental Divide, Moxa Arch and Hiawatha, BLM should provide for an annual planning meeting with the Operator, BLM, local cooperating agencies and affected livestock operators.
1128	CLG members recommend that the project adopt a coordination committee consisting of the Operator, BLM, county and conservation districts plus affected landowners that will meet regularly to address these issues. Advance notice and planning will alleviate some of the surprises as well as improve services.
1128	BLM should also provide that the annual planning meetings (and more as needed) will include the Operators, BLM, affected livestock grazing permittees, landowners, and the local cooperating agencies, and that such meetings will address other resource issues such as livestock grazing, reclamation, transportation, and the development plan for the coming year.
1130	Coordinate with Wyoming Department of Environmental Quality.
Surface Disturbance	
1033	The plan disturbs less than 4% of the total area initially and only 1% after completion.
1042	One could argue that the proposed amount of wells is too high and could be lowered for preserving a decent amount of land from being disturbed. Perhaps lowering the amount of wells would make it easier for the public to feel at ease with this whole proposal.
1064	The park also suggests that limits on the amount of disturbance in addition to those on timing and development be considered in the development of the full range of alternatives.
1089	3) There is already in place a to-market pipe line (from Bridger to Opal), so this project will continue to feed that line. There would reduce the amount of ground disturbance that is often a side effect of beginning a new project.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1092	Encana's proposal features a variety of advanced mitigation techniques that will limit surface disturbance and minimize impacts to local ecological resources. Encana proposes to install a three-phase liquids gathering system, implement several cutting-edge emission reduction technologies, utilize directional drilling when possible, and limit disturbance to four multi-well pads per section. These measures will limit total surface disturbance to approximately 5,429 acres (3.9% of the planning area) and post-reclamation disturbance to approximately 1,411 acres (1% of the planning area).
1099	The EIS needs to analyze alternatives which minimize the amount of surface disturbance and topsoil removal. Pipelines should be co-located with roads, pipelines should be installed with techniques such as plowing whenever possible, ……
1099	An alternative should be developed with both long-term and short term disturbance caps to encourage minimization of surface disturbance, as well as rapid and successful reclamation.
1104	To minimize habitat disturbance, construct only the minimum footprint needed to develop oil and gas facilities (e.g., roads, multiple wells from singe pad, use of directional drilling). We support the proponent's efforts to co-locate new infrastructure whenever possible.
1104	In order to reduce reclamation costs, make reclamation easier, and minimize habitat loss, we recommend removal of vegetation only where trenching will occur.
1104	In sensitive or crucial habitats, special precautions and techniques should be employed to minimize the width of the disturbance area.
1119	Encana has also committed to pad drilling which I think is a commendable approach as it will greatly reduce their footprint in the NPL.
1121	Site pipelines above ground, where technically feasible, to reduce surface disturbance, soil erosion, and visual impacts; In many cases, project proponents are required to bury pipelines on the theory that it reduces visual impacts. The Local Governments experience is that buried pipelines have their own and often greater impacts due to the surface disturbance and visual evidence of the pipeline, often more than a decade after construction. Thus, if technically feasible, the proponent should be allowed to construct the pipeline above ground or if small enough, the rip the pipeline in, to reduce surface disturbance, soil erosion, and potential increase in noxious weeds.
1121	Support the use of horizontal drilling where technically feasible to reduce roads and related surface disturbance; Where technically and economically feasible, Lincoln County supports the use of horizontal drilling techniques to reduce the number of well pads and related surface disturbance.
1124	Encana understand and respects the land and the people who live and work near the NPL. Only 5% of the leases acres will be impacted and those acres will be fully reclaimed. Minimal access roads and equipment areas will be maintained.
1126	.:. Directional drilling to minimize surface impacts will occur; and
1128	The EIS should consider the alternative of above-ground pipelines to reduce surface disturbance. Alternatively, CLG recommends ripping in pipelines where possible to limit surface disturbance. Either method reduces surface disturbance and reclamation issues.
Traffic and Transportation	
1002	Please defer all traffic from Rearden Draw Road. The road is barely improved and can't withstand the traffic. Soil conditions promote heavy thick dust (6 inches) with heavy use and any moisture makes the road impassable.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1009	WYDOT's interests are transportation related. New/existing approaches will need to be reviewed and permitted according to our current access manual. Approaches are handled on an independent basis. Traffic volumes, traffic impact studies, etc. are taken into account.
1067	The effects of proposed alternatives with respect to county roads in the geographic scope of the project area, particularly their current standards and conditions, dust abatement, and traffic safety.
1067	Please address the feasibility of project access from Reardon Draw Road during alternative development.
1067	Please disclose which county roads will be used for water removal.
1067	Please analyze road impacts based on dust mitigation and traffic volume and consider paving main access roads if traffic volume indicates that it would be feasible.
1067	Please state how traffic safety will be addressed during periods of heavy industrial traffic.
1099	In our experience, roads in areas of energy development are often designed and built for high volumes of vehicular traffic associated with well drilling, rather than the low volumes of traffic associated with production. It is not uncommon to have a wide crown and ditch road going into a producing well, even though the road has less than daily traffic. The BLM should analyze an alternative which minimizes surface disturbance and only builds roads to the minimal standard necessary for the production phase.
1099	Additionally, the EIS should analyze requiring all produced water and condensate be piped to centralized gathering facilities to reduce the need for roads designed for frequent large truck traffic.
1102	No use of the Burma or Antelope roads for project access should be permitted – as negotiated in the Jonah II project decision. The only access that should be utilized is the Lumen Road.
1104	Closing open roads of equal distance should offset any new roads added to the present road system.
1104	Closed roads should be obliterated and reseeded where appropriate.
1104	Off-road travel should be avoided, if possible, especially during wet/muddy conditions.
1104	Where pipeline construction entails a large work force, construction workers should be bused to the work location.
1121	Coordinate transportation planning with respective county governments to ensure that road jurisdiction is properly documented and to address impacts on county transportation systems; The EIS needs to display the affected county roads both within the project and the access to the project. The maps do not show the county roads. Impacts on county roads are not listed as a scoping issue, although they are likely to be significant. The counties are prepared to work closely with BLM in addressing the impacts and identifying necessary upgrades to meet anticipated demand.
1121	There is some concern that BLM has issued rights-of-way to oil and gas lessees over county roads. The Local Governments object to issuance of rights-of-way on their roads and urge BLM to begin the process of reviewing county records and maps and displaying these roads on project maps.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1121	There needs to be close coordination between the project proponent and local governments to address road maintenance, road reconstruction, and traffic impacts. The transportation plan should closely involve affected counties to ensure coordination with the county transportation system and to address conflicts early in the process.
1125	Sweetwater County Roads: If any Sweetwater County Roads are utilized to access this project, Sweetwater County requests that the project proponent obtain all required Sweetwater County road right-of- way access permits or road crossing licenses from Sweetwater County's Engineering Department prior to the utilization of a County R.O.W.
1125	To ensure that public roads, cattle guards and bridges are maintained in a safe condition and are not damaged by heavy construction traffic, the Sweetwater County Engineering Department requests that before contractors move heavy equipment over County roads they contact the County Engineer, Mr. John Radosevich, at (307) 872-3921.
1128	CLG members support the NOI issue of analyzing and disclosing the impacts on traffic and county road systems. Coordination with the county road departments needs to be a condition of the development plan.
1128	The project needs to have a Transportation Plan and its development should be closely coordinated with the local governments and integrated into the county road system. To date, BLM has not facilitated coordination on the basis that travel outside of the project area had no bearing on the EIS. As explained in CLG comments on PAPA and the Pinedale RMP, there is little direct funding to the county to address these road impacts. Moreover, BLM imposes seasonal restrictions on road maintenance and gravel mining, thereby further burdening county road departments and limiting road maintenance.
1128	While the roads are located outside the project and are public roads, the indirect and cumulative impacts should be discussed and mitigated.
1128	Development will also have potentially significant impacts on county services and road capacity. The EIS needs to identify the regional transportation system of state and county roads, and subsequently address the impacts to the county road system and maintenance.
1128	Operators and BLM need to coordinate with the affected Counties and provide for mitigation. Historically, there has been relatively little coordination with local governments, especially with respect to the impacts that occur outside of public lands. Thus, BLM decisions leave county resources stretched to provide transportation facilities, services, and to compensate for the indirect and cumulative impacts.
1128	The 2008 proposed action assumed that special arrangements would be made with the Wyoming Department of Transportation and the affected County to transport oversize loads to the project area. Otherwise, load limits would be observed at all times to prevent damage to existing road surfaces.
1128	There will also be additional impacts on road systems outside of the project area that should be addressed. Specifically, much of the equipment and supplies are trucked in from Sweetwater County and employees commute from towns in both Lincoln and Sweetwater Counties. This puts pressure on existing state and county roads. CLG members recommend that routes between Jonah and South Jonah be built.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1128	The State of Wyoming does not distribute half of its oil and gas revenues to the local governments, which is the case in neighboring states of Colorado and Utah. While the 2011 legislature authorized road impact funds, none applied to the counties likely to be affected by this project. Therefore, the EIS needs to consider the number of trips, miles and duration as an indirect effect of the project and impact that should be mitigated as well. The EIS must also consider the transportation budget impacts for the affected counties.
1128	Operators should also compensate counties for increased levels of use and damage or wear and tear above normal levels to system. While county roads are open to the public, the respective roads departments need to be able to anticipate and deal with the additional impacts, especially when there is a significant increase in both the size and weight of vehicles. The local governments often face significant increases in road maintenance costs without direct funding to cover the work needed. While recent legislation allocated funding to counties, it does not include future programs.
1128	CLG members recommend that the operator and BLM consider the most direct routes west and north. The 2008 proposed action would have assigned a circuitous route with more miles on Federal, state and county roads, and running through two towns; Marbleton and Pinedale. This heavy truck traffic adds to roads that already exceed their levels of service, adds to congestion in communities, and contributes to air pollution. A more direct route between South Jonah and Jonah Field would facilitate reduced air pollution impacts.
1128	The seasonal restrictions also mean that construction traffic overlaps with tourism, with resulting congestion, traffic jams, and certainly harm to the aesthetics of the visitor experience.
1128	BLM must consult with the counties about road closure decisions. The BLM practice of using OHV closures made in land use plan decisions to effect de facto closures for existing roads and trails should end. Certainly, reclamation direction must respect county roads and also reflect ongoing access needs.
1128	The EIS needs to identify the projected locations of proposed new and upgraded roads. Otherwise the EIS will not adequately address the Project's transportation related impacts.
1128	The EIS needs to disclose that the levels of use for many of the area roads and those that are at or beyond what is considered safe. Highway 191, for example, is currently being upgraded because of the increased traffic. The EIS should include a level of service study for roads, especially the route between Jonah and South Jonah and then identify mitigation.
1130	Traffic should be required to travel at low speeds
1130	The associated infrastructure and road system will need to be clearly defined in the EIS with a travel management plan included.
Vegetation	
1104	Any wetland impacted by this project should be restored to pre-project condition or mitigated in-kind.
1104	Impacts to wetlands and …….
1104	Riparian canopy or stabilizing vegetation should not be removed if possible. Crushing or shearing streamside woody vegetation is preferable to complete removal. Any such vegetation that is removed in conjunction with stream crossings (perennial or intermittent) should be reestablished immediately following completion of the crossing.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1131	EPA considers the protection, improvement, and restoration of wetlands and riparian areas to be a high priority. Wetlands increase landscape and species diversity and are critical to the protection of designated water uses. Possible impacts on wetlands include damage or improvement to: water quality; habitat for aquatic and terrestrial life; channel and bank stability; flood storage; groundwater recharge and discharge; sources of primary production; and recreation and aesthetics. Road and pipeline construction, land clearing, and earthwork generally include sedimentation and hydraulic impacts which at some level may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Riparian habitats, similar to wetlands, arc important ecological areas supporting many species of western wildlife. Riparian areas generally lack the amount or duration of water usually present in wetlands, yet are "wetter" than adjacent uplands. Riparian areas increase landscape and species diversity. and are often critical to the protection of water quality and beneficial uses.
1131	EPA recommends that in order to provide the highest level of protection to wetlands, the Draft EIS disclose potential impacts and analyze methods for restricting actions on certain lands and developing and enforcing best management practices (BMPs) to protect of these valuable aquatic resources.
1131	Offer a detailed inventory and mapping of wetland resources within the area being proposed for drilling, including both wetlands that arc regulated under Section 404 of the Clean Water Act and wetlands that are determined to be non-jurisdictional and protected under Executive Order (EO) 11990 - Protection of Wetlands (May 24, 1977). EO 11990 applies to all wetlands located on Federal lands. It directs all Federal Agencies to provide leadership and take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands.
1131	Include assurances that there be a complete avoidance of disturbance to any fen wetland (a Category I resource).
1131	Furthermore as the project proceeds, EPA encourages the BLM to require delineation and marking of perennial seeps, springs and wetlands on maps and on the ground before development so the project will avoid impacts to them.
1131	We also recommend establishment of wetland and riparian habitat 100-foot buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas.
Visual Resources	
1037	3) I believe that the Wilderness areas of the Wind River Range are designated as a class I view-shed. My understanding is that denigration of this view-shed is prohibited. I believe that studies have been done indicating that the current level of gas development in the Upper Green is already impacting the view-sheds in the Wind River Range. Speaking personally, I have watched this decrease in visibility take place over the last twenty years. When I drive from Lander to Pinedale, I am often met by a brown cloud of airborne particulate when I cross over South Pass. I would expect that adding another gas field to the Upper Green would likely further impact the class I view-shed of the Wind River Range.
1089	5) The location of the project is far from the general public's back window. Residents do not have to worry about the noise of a drilling rig (although Encana has been known to run very noise, emission, and overall efficient drilling rigs), bright lights, vehicle traffic, or daily employee operations. It is distant enough to not have a negative direct affect on the communities with the added benefit of our production being able to support their forward progression.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
Water	
1006	Water is now the gold of this century. Let's use the technologies available to save, not waste our precious resource. Think about recycle systems that work in other places.
1010	2. Water - Production water regularly ends up spilled and often goes unreported.
1013	In order to verify ground water is being protected during drilling operations I recommend that each cement job be tested by the BLM and scanned electronically to ensure that the cement job is good. Without these steps it is easy to let less than perfect jobs fall through the cracks.
1014	I see no reason for water to be contaminated for all life on earth by this process. The toxic polluters won't even tell the public what toxic pollutants they are using. Who in their right mind would allow such a permit to drill in that kind of environment? this is outrageous. absolutely outrageous.....healthful water is essential for all life on earth. let the polluters drink their toxic mixture.
1038	I also think that water quality needs to stay a main concern because water is used in many ways around the county.
1039	I insist that you take extra special for.....the water quality.
1040	Water safety ..... are other major issues.
1052	Water quality: I am a human being and in case you fell asleep in biology I am 70% water. To maintain this very important homoeostasis it is very important that I drink water. However, not just any water will do. I would find much comfort in knowing that the water I drink is pure and not full of poisonous chemicals.
1054	But I have a few concerns about this project; I am worried about the ..... water quality, because I don't want this project to create more pollution in our area. And I have a few questions to ask about the air quality and the water quality. The second question is about the water quality, I want to know what EnCana is going to do with the dirty water used for wells, are they going to recycle that Water?
1064	The NPS would like to see a detailed analysis of the water quantity estimates, sources, and water transmission methods used in exploration and production. Test wells in the Pinedale area already have elevated levels of hydrocarbons. There is the potential for these hydrocarbons to migrate into drinking water wells and surficial aquifers.
1067	Please provide a comprehensive spill plan for main access routes.
1067	The EIS should provide measures to minimize pollution and mitigate impacts if necessary.
1067	Baseline water quality data should be collected prior to the start of the project and should facilitate future monitoring analyses.
1067	Further, that all wells are sampled for quality immediately upon being drilled and are regularly sampled throughout project activities.
1067	Additionally, water wells drilled should remain functional (not plugged and/or abandoned) for use by livestock operators, monitoring, or other beneficial use.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1067	Recent articles (e.g. Lustgarten 2008) regarding the oil and gas industry practice called hydraulic fracturing have uncovered a series of contamination incidents that raise questions over the Environmental Protection Agency's (EPA) stance that the process poses no risk to drinking water. Accordingly, the BLM should review recent incidents and the hydraulic fracturing process. Please provide information on the following potential issues linked to hydraulic fracturing: Where appropriate, disclose all hazardous chemicals used in the fracturing process, and consider the risks involved concerning the area's surface water and groundwater. Use best available models to make a probability estimate of contaminate mobilization to aquifers from fracking.
1069	Creating an advisory committee was a positive step, as was appointing Linda Baker with the Upper Green River Alliance. Issues of ….water quality need to be addressed from a larger point of view rather than incrementally.
1085	The effects of these two enormous fields have impacted the air quality and water resources from Pinedale to Sublette Flats. The trapped ozone and nitrogen oxides are being absorbed by the pristine watersheds of the Wind River and Wyoming Range Mountains. These important water resources supply millions of downstream users with vital drinking water.
1095	We are concerned about impacts to water quality from chemical spills, runoff from roads and well pads, disturbance on unstable soils and/or steep slopes leading to stream sedimentation, contamination from well blowouts or improper completions, and contamination of groundwater from toxic fracking fluids. In order to satisfy the 'hard look' analysis of impacts pursuant to NEPA, the BLM must fully disclose the chemical constituency of any and all fracking fluids and drilling muds and their potential impacts on human health, vegetation, and wildlife.
1096	Has there been a characterization of the aquifers in the project area?
1099	We request the BLM build on the lessons learned from the Pinedale Anticline and Jonah Field developments to design and implement monitoring plans, and to require resource protections to protect all waters of the state, including wetlands and groundwater.
1099	Roads should also be designed so that surface water running from or across the road is not concentrated in a way that causes erosion. Runoff and erosion from roads, culverts and ephemeral channel crossings can compound and cause significant sediment loading as well as channel alteration both upstream and downstream of the crossings. It is important that all these locations are monitored so that any erosion can be mitigated before growing into larger erosion problems.
1099	Spill Reporting. Chapter 4 of the WDEQ Water Quality Rules and Regulations requires that the WQD be notified of spills or releases of chemicals and petroleum products. The EIS should reiterate this and explain how soils, groundwater and surface water impacted by spills, leaks and releases of chemicals, petroleum products and produced water will be restored.
1104	Sedimentation to the watershed including ephemeral drainages, and the potential alteration of stream channel morphology and stream bed structure including side channel habitat.
1104	Destabilization of stream banks as a result of activities and developments including but not limited to discharge, roads, and the removal of vegetation.
1104	Changes in water quality due to spills or other contaminants in the rIvers, increased sedimentation, and other sources of contamination.
1104	We recommend any pipeline crossing of water courses should be adequately protected against surface disturbances and damage to the pipelines that might result in a spill event.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1104	Any pipeline crossing of intermittent streams can be trenched.
1104	Any pipeline crossing of perennial streams and rivers (i.e., the Green River) should be accomplished by boring under the active channel to avoid impacts to the channel and associated riparian areas. This would further eliminate any concerns with sedimentation and the need to avoid critical times of year such as when fish species are spawning. Not entering the live channel will also minimize AIS concerns. Boring pits should be located far enough back from the channel that stream bank stability is not reduced. Boring should be done in a manner that will impact the stream and all associated riparian habitat, including any side channels. Willow clumps or native potted plants should be used to stabilize any disturbed banks.
1104	Any pipelines that parallel drainages should be located outside of the 100-year floodplain.
1104	Pipeline crossings of riparian areas and streams should be at right angles, to minimize the area of disturbance. Pipelines should not be routed through riparian areas other than for purposes of crossing streams.
1104	Right-of-way widths should be minimized where the pipeline crosses riparian areas and streams.
1104	We recommend soil erosion should be controlled. Erosion control structures should be in place to prevent the spread of sediment to perennial and intermittent stream channels.
1104	Buffer zones of 500 feet or the 100-year floodplain of undisturbed vegetation should be left along each side of standing waters and water courses to minimize sedimentation ……...
1104	Buffer zones of at least 300 feet for ephemeral drainages.
1104	Riparian areas and floodplains should not be used as staging or refueling areas. All chemicals, solvents and fuels should be kept at least 500 feet away from perennial streams, ephemeral streams, and riparian areas.
1108	11. Delineation of the hydrology and water shed of the area to reduce impacts of fracting and loss of ground waters that contribute to springs into the area and also the headwaters of the Colorado River for downstream users.
1109	We request that BLM contract with a third-party hydrologist with no conflict of interest or association with the regulated community to conduct baseline groundwater monitoring on all water wells. We also request that BLM require that an aquifer characterization be conducted. This monitoring data should be analyzed, and a thorough public report be made available at the BLM website that shows groundwater chemical and physical properties. These baseline groundwater properties should be rigorously protected and maintained by BLM and all cooperating agencies to ensure clean water supplies for all future, beneficial uses.
1124	Encana will also use state of the art technology to protect and monitor groundwater, control surface runoff and protect natural drainages.
1128	Degraded roads also increase runoff and nonpoint source water pollution.
1128	BLM should also include a more detailed discussion on exporting produced water.
1128	The EIS should provide for in-field water disposal, in order to reduce traffic and decrease disposal on more sensitive lands. Trucking produced water to offsite locations will require hundreds of trips a month. If the former circuitous route between Jonah and South Jonah were to be used, even more miles are involved. BLM should explain the source and distance of the water to be trucked both to and from the drilling sites. The EIS should also discuss the alternative of allowing the water to be evaporated in the field rather than removal by tanker trucks and the reasons that this option is not considered.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1128	The EIS needs to identify water wells and springs that may be affected by water used for drilling operations. The grazing allotments depend on these springs which may be affected if water is taken from shallow aquifers. If the water modeling shows no impact then the EIS should so state.
1128	The EIS should incorporate by reference the WDEQ nonpoint source best management practices.
1128	The area proposed for drilling in 2008 did not have wetlands as that term is used in 2007 EPA guidance and Supreme Court decisions. Section 404 permits do not apply to ephemeral or intermittent waters that lack a close nexus to interstate waters.
1128	Before concluding there is a depletion issue, BLM must document water use by aquifer and connection of the affected aquifers to the Green River system. If the proposed action uses water released by drilling, which is nonpotable and reuses the produced water, then depletion is not an issue, unless BLM can show the aquifer is directly related. In most, if not all, cases this would not be the case. Thus, the use of the water in the proposed action is clearly not subject to depletion limits.
1129	The BLM must include a description and analysis of the water available for development and use under the state's regulatory, administrative and legal arrangements commonly known as the Law of the (Colorado) River. This project is located adjacent to the Green River and New Fork River, both a part of the Upper Green River watershed drainage, and the Upper Colorado River
1129	The significant size and scale of this project potentially could impact major alterations of aquifer hydraulic characteristics, flow patterns, and subsurface water quality over large areas, not only from the high number of projected wells within the project area but from adjacent drilling plays as well. Included in these impacts are the drilling activities themselves, de-watering, isolation, reclamation, waste disposal, and excavation activities associated with the drilling and production processes. TU recommends the BLM review and analyze all of the above.
1129	Often, oil and gas exploration and drilling can impact water uses, quality of flows and returns to surface rivers, and land use and vegetation, including rangelands used for grazing and riparian areas. Based on past and current water quality and quantity studies occurring within the Pinedale BLM resource area and the Pinedale Anticline natural gas field, the necessity to develop and engage an adequate monitoring program is extremely important. Rather than wait until contamination events occur, such as those that were found in the Pinedale Anticline and surrounding areas resulting in well contamination and livestock deaths, an adequate monitoring program must be implemented that produces data that describes hydrogeologic conditions and has the ability to detect potential groundwater impacts due to natural gas development. TU suggests the BLM refer to the Geomatrix Hydrologic Model (2008) used for the Pinedale Anticline as a basis for establishing such a monitoring system.
1129	Lack of existing groundwater and surface water interaction/exchange is currently not quantified in the Jonah development area. The Environmental Impact Statement (EIS) must include a requirement that monitoring wells be established within and adjacent to the drilling project's area, which borders the Jonah field on three sides.
1129	Inventories must be completed of existing and abandoned oil and gas wells within the project area, inventories of water well locations, and coordination of all of these inventories to assure that the databases contain no discrepancies or irregularities that eventually could affect future monitoring and water quality results.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1129	Baseline monitoring of water wells, streams, and the Green River and New Fork River must be implemented prior to exploration and development of any oil/gas well. This will provide a solid database for evaluation should future water quality changes occur once drilling begins. The ability to detect such water quality changes due to any number of incidents related to the drilling of natural gas wells is dependent on background information that would be supplied through the pre-development baseline inventory.
1129	The NPL project is located within the 100-year floodplain, including numerous drainages that flow into the Green and New Fork Rivers. The BLM must account for ramifications from heavy silt and sedimentation flows that occur naturally from weather-related events and from the impacts associated with drilling activities, such as clearing an 18-acre or larger well pad free of vegetation.
1129	Based on the climate, precipitation, and soils regimes for the project area, the BLM should include an analysis which evaluates impacts from sedimentation and soil erosion caused by winds, storm water runoff from construction activities, and roads.
1129	A comprehensive water quality threshold matrix should be designed that defines a process for managing for any water quality and quantity issues that might arise from the large scale of this project, and when added to the mix of other oil, gas, and other energy development projects in the resource area.
1129	When evaluating this project we sincerely hope that the BLM takes a hard look at potential impacts to ground and surface water, terrestrial and aquatic habitats, the indirect affects that many sportsmen will experience with a potential loss in hunting opportunities, and air quality as well as the cumulative effects of development in the Pinedale and Rock Springs field offices. Through analysis and planning the BLM can significantly decrease the impacts to fish and wildlife associated with this project.
1130	Alkali Creek and Granite Wash off the Green River along with many smaller streams are within the proposed project area. The 3,500 wells proposed and its associated infrastructure will disturb vegetation and soils; therefore, water quality, quantity, and riparian condition need to be addressed in the EIS. The surface disturbing activities that take place in the production of natural gas cause nutrient and sediment loading in streams resulting in turbid, warmer water.
1130	Spills of oil, gas, salt water or any other noxious substance pose risks to the quality of the surface and ground water. A straightforward response plan needs to be developed and safeguards established to mitigate the potential for spills.
1130	Any water wells in the area need to have baseline studies conducted prior to development of the first well and monitoring through water sampling should ensue.
1130	Produced water will also need to be addressed. A number of wells in the region produce highly mineralized and saline water (see i.e. Wyoming Oil and Gas Commission water quality data for Jonah Field, WOGCC website). A typical well completion involves approximately 25,000 barrels of water. Already, critical contamination issues are being observed in the Pinedale Anticline area, northeast of the proposed project. During routine surveys, 88 wells out of 230 wells were discovered to be contaminated with benzene, a highly toxic chemical (DEQ 2008; EPA 2008). Highly mineralized water produced in significant quantity and released to adjacent small surface watercourses and streams will result in significant changes to water quality characteristics and related aquatic and riparian biological resources.
1130	Provide details in the EIS on how Encana will handle produced water.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1130	Use the state-of-the-art technology to protect and monitor groundwater in the proposed project area.
1130	Predict the level of vegetation and surface disturbance to mitigate stream impacts and then identify what those impacts will be.
1130	Also identify what measures will be taken to prevent ground and surface water pollution.
1130	Assert best management practices to control surface runoff and protect natural drainages.
1130	Provide a detailed description of the subsurface hydrology with characterization of the aquifers that could be affected.
1130	Identify the differing geological formations and provide quantitative descriptions of the geohydrological characteristics of each formation.
1130	Identify water users who depend upon groundwater resources and …….
1130	Identify water users who depend upon groundwater resources and provide mitigation measures.
1130	Provide a thorough analysis of surface and subsurface hydrologic conditions and produced water with a full discussion of produced water disposal, including treatment, re-injection, evaporation and discharge.
1130	Provide a thorough analysis …….. and produced water with a full discussion of produced water disposal, including treatment, re-injection, evaporation and discharge.
1130	Analyze the impact of well development activities. Address fracking, the use of drilling muds and injection of other substances, penetration of aquifers and aquitards and related potential inter-aquifer communication.
1130	Complete a thorough and updated baseline water quality study of streams and aquifers.
1130	Establish a well monitoring protocol for spill detection.
1130	Provide a full discussion of potential contamination issues.
1130	Conduct a thorough and updated analysis on all stream and drainage crossings of pipelines, roads, improved access areas, staging areas, and water disposal facilities.
1130	Discuss the water demand associated with the exploratory drilling, production activities, and the source of water anticipated to supply the demand.
1130	Discuss the water demand associated with the exploratory drilling, production activities, and the source of water anticipated to supply the demand. Analysis the impact on affected water users.
1131	(2) Groundwater and surface water resources are of significant importance, rendering it necessary to fully analyze the resources, potential impacts and associated mitigation measures. EPA considers the protection of groundwater, drinking water supply and quality, and stock and irrigation water supply and quality to be among the most critical issues of any NEPA analysis in areas with the potential for oil and gas development. To this end, EPA recommends that BLM pay particular attention to ensuring a robust treatment of this issue in the NEPA analysis.
1131	Oil and gas activities, including construction, drilling, well stimulation, pipelines, produced fluid storage, reinjection of produced water, and transport provide opportunities for the introduction of contamination into the groundwater including petroleum compounds (e.g. benzene, toluene, xylene, etc.) and other hazardous chemicals. EPA recommends the Draft EIS characterize water resources, analyze potential impacts to, and identify appropriate mitigation and monitoring measures to protect groundwater, drinking water, stock and irrigation waters.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1131	Given EPA's concerns regarding water quality in and around the project area, we recommend that BLM fully evaluate water resource impacts associated with the project by including the following in the NEPA analysis: • A thorough characterization of existing groundwater and surface water resources within the project area, including: o Maps of groundwater and surface water resources in the area to be developed. o Baseline data on the condition and quality of groundwater and surface water resources. EPA recommends this evaluation include any evidence of hydrocarbon impacts. If hydrocarbon impacts are found, a full suite of analytical information must be collected to evaluate the sources (anthropogenic or natural), volume and areas of impact. o Information on the quality, quantity and location of all groundwater aquifers, recharge zones, any laterally extensive confining units or the lack there of, and zones of fracturing or faulting that extend to a depth that could allow migration of fluids or gas during well construction or hydraulic fracturing. o An identification and description of all Waters of the U.S. that could be affected by the project alternatives; and where applicable, acreages and channel lengths, habitat types, values, and functions of these waters.
1131	Disclosure of which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters.
1131	Identification of all source water protection areas within each alternative.
1131	• Surface water and groundwater use, including the location and source identification of agricultural. domestic and public water supply wells or intakes
1131	• Analysis of potential impacts to water sources from all phases of the oil and gas development and operations.
1131	Analysis of the management of the fracturing fluids, including the toxicity and fate of these fluids, with a focus on avoiding surface spills or leaks of these fluids from the reserve pits. Some hydraulic fracturing compounds contain materials that could be harmful if released. It is critical the Draft EIS disclose what fluids will be used for hydraulic fracturing purposes in order to determine what other compounds need to be monitored to determine if there are impacts to important water aquifers from the stimulation process.
1131	If hydraulic fracturing fluids will include diesel, the stimulation process will need prior approval under the Safe Drinking Water Act.
1131	In addition to disclosing the anticipated fluids to be used for the hydraulic fracturing, EPA recommends the Draft EIS also provide an estimation of flow-back volumes to assure the proposed project has appropriately estimated Water management needs.
1131	Proper well design and construction are crucial to protecting groundwater resources. EPA recommends the Draft EIS specify how groundwater will be protected with the proposed well design and casing. Among other things, this analysis must include: casing design and cementing requirements, pit liner requirements, review of existing wells for inadequate casing, and cementing related to new production zones.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1131	A groundwater monitoring program is essential to ensure groundwater resources are adequately protected and well design and mitigation measures arc effective. To this end, EPA recommends that the Draft EIS include a comprehensive and detailed groundwater monitoring and mitigation plan for all aquifers that may be potentially impacted by the proposed operations. It is important that the monitoring program track any groundwater impacts as drilling and production operations occur.
1131	EPA also recommends the Draft EIS specify how any contamination of groundwater or surface water will be remediated and how water well owners will be compensated if contamination occurs.
1131	As a cooperating agency, EPA is committed to working with the BLM and Wyoming DEQ towards developing a groundwater analysis, monitoring and mitigation plan for this project.
1131	Water quality parameters such as conductivity, dissolved and suspended solids, metals, pH, temperature, dissolved oxygen and physical aquatic habitat parameters may also be important monitoring indicators for determining stream or lake impairment or stress, as well as its sensitivity to further impacts. The EPA recommends existing water quality standards applicable to the affected water bodies be presented to provide a basis for determining whether existing uses will be protected and water quality standards met.
Wild Horses	
1108	1. Allowance for wildlife friendly fencing in areas where cattle can be excluded and to still allow access for wild horses.
1108	2. Relegation and mitigation work that enhances the area to support antelope in winter as much of this area is …..and wild horse country.
Wildlife	
1003	As a lifelong resident of WY and a sportsman I know that we (people in the oil and gas industry) can do this with a minimal impact on the environment and wildlife. For instance in Alaska, the porcupine caribou herd has increased in numbers on the north slope in spite of drilling. I believe this due to good companies being good stewards of the land.
1011	Please do whatever you can to keep the wildlife and wild horses as safe as possible. I would like them all to live a long and happy life without any bad interruptions. I think that because even though this is for our county the animals deserve their part in making themselves happy.
1011	Also, the animals are like us and they want to have a clean environment to live in and we should help them get their wish so they can live happily.
1017	I've also seen oil and gas production revenues contribute to substantial improvements and growth in wildlife habitat
1022	Also the NPL project is gathering many wildlife data to minimize negative impact on effective specs.
1029	We have already seen dramatic negative effects on sage grouse, big game, and ……..in the Pinedale Anticline.
1029	Along the migration corridor for the Grand Teton pronghorn herd, require a corridor at least 2 miles wide where drilling and road construction are not allowed.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1030	As part of my job, I am constantly involved with maintaining environmental regulations to insure we are doing everything within our ability to insure good environmental stewardship. In most cases, we go above what is actually required by regulation in an effort to assist the environment. I have personally witnessed improved, not maintained, wildlife habitat and conditions as a result of efforts by the natural gas company I work for.
1033	Encana has been a leader in innovations to lessen impacts on wildlife and habitat.
1037	1) Since the development of the Pinedale Anticline and the Jonah Field we have seen a decrease in the wintering mule deer population on the Mesa on the order of 60%. From a review of the literature, it is my understanding that these mule deer have not shown up in any of the surrounding herds and are presumed to have died. This decrease has occurred despite the best efforts of the gas companies to mitigate their impacts on wintering wildlife. At this point it is my understanding that efforts at mitigation have been largely ineffective. I would expect that adding another gas field to the Upper Green River Valley would only increase pressure on wintering wildlife that would result in further declines in population.
1038	Another concern I have for the development of the wells is surface disturbance. The animals around the area are important to the lifestyle of people in this community. I don't necessarily think that nothing should be disturbed but I do think it should be managed so that none of the animals are harmed in a large way.
1039	I insist that you take extra special care for the wildlife …...
1040	…...animal migration are other major issues. ……..but all other animals in the area will also be affected. How will EnCana protect these animals?
1041	I careful reviewed the wildlife habitat and critical areas shown on maps at the public scoping meetings. It is quite evident that the critical areas have been identified by federal and Wyoming Game and Fish personnel. I have no doubt that the agencies involved will protect critical wildlife areas for this project.
1042	Another reason that this is a big issue is because of the wildlife that will be harmed by the construction of all these wells. The area that has already been used for drilling has endured a lot of habitat destruction and it will take a long time for it to be back to normal. Adding more drilling means less area for the wildlife that lives around those parts.
1044	The only other concern I have, and it's a minor one at that, would be the health and safety of wildlife and the affect on their environment. With deer migration, pronghorn habitat, countless other game animals being affected by the NPL. I would like to see some minor measure taken to ensure wildlife longevity and overall balance between human and animal interactions.
1045	Animals could become endangered by this, but they could be moved as well that way their homes won't be completely destroyed as what people say is going to happen.
1046	Another bad thing is that it will also mess with the wildlife even more than it already has.
1047	……..also the wild game aspect is a problem with the proposal. Wild game is a cherished piece of Sublette County, with more wells the migration patterns of animals will become even more distressed, which in result, will reduce the numbers of wild game in our area. To minimize risk to animals I believe wells need to be separated farther apart, with minimal roads built, and a light traffic through the area. This will keep numbers from dropping drastically.
1053	The dirty air can also affect our wildlife. The more the pollution the animals will slowly disappear, not only will the dirty air run the animals out…….

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1053	……..but so will the lack of space. If the rigs take up more and more space this will drive animals away.
1053	Then by moving the rigs around you are also killing the vegetation and plants. Sage does not grow back easily, so will you be planting new and how long will it take to grow back, if it takes to long the animals will not want to wait.
1063	The above words are taken directly from the Wyoming Outdoor Council webpage. I could not have put it better when it comes …….. in addition to the destruction of wildlife habitat.
1064	The annual migration of the pronghorn between Jackson Hole and the Green River basin represents the longest terrestrial animal migration event in the lower 48 states; a phenomenon which is of regional and national significance. Animals that spend the summer within Grand Teton National Park (GTNP) migrate to wintering areas in the Green River basin, including some that are adjacent to the NPL project area. Radio collared pronghorn from the park have moved through the NPL project area en route to wintering grounds near Fontanelle Reservoir and areas further south towards Rock Springs. Several radio collared animals have also spent time in the project area during the winter months. Conservation of the habitats these pronghorn depend upon in the winter and their movement corridors are essential to the persistence of the park's pronghorn population. Although pronghorn are currently successful in returning to the park each year, there may be a threshold of oil and gas development and activity at which they no longer do so because of impaired habitat connectivity or population level demographic impacts related to habitat loss, fragmentation, and/or disturbance.
1064	The status of and long-term prospects for the mule deer population living seasonally and year-round in the Green River basin, including the project area, is also of concern. Although the mule deer that reside in this area belong to the Sublette herd, some of these deer also migrate long distances and spend the summer in and around the Jackson Hole area. Recent documentation of significant population declines and lower survival rates for deer on the Mesa where gas development is ongoing highlights the level of concern over additional development in a new area.
1064	There is likely a limit to the amount of continued, incremental habitat loss, fragmentation, and disturbance that wildlife populations can withstand. In the interest of ensuring the persistence of the pronghorn and mule deer populations that summer in GTNP and the Jackson Hole area, the park would like the upcoming Environmental Impact Statement (EIS) to consider identifying thresholds at which impacts to ungulate populations are significant and use these to predict potential impacts and guide development of alternatives that minimize such impacts. Given the amount of research previously conducted in the area, as well as that which is ongoing, identification of threshold levels for well pad densities and roads and other linear features should be feasible.
1064	As well, we would like to see the EIS address the issues of habitat fragmentation and the affects of development on habitat connectivity,
1064	impacts to ungulate migratory movements,
1064	impacts to crucial seasonal ranges for ungulates,
1067	The Sublette County Commission supports the proposed extraction of natural gas from the NPL project area. We also favor the protection of wildlife species and their habitats, particularly those species that contribute to the quality of life in Sublette County, provide for traditional uses, and contribute to the economic base through activities such as hunting, fishing, and guided expeditions.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1067	Recognizing that natural gas extraction can conflict with wildlife habitats and species viability in specific situations, we expect the BLM to accurately analyze and fully disclose the impacts to wildlife resources and species.
1067	On both important and crucial mule deer and pronghorn winter ranges, please include an in-depth analysis of impacts on wintering populations and develop appropriate mitigations if needed.
1067	To minimize overall disturbance to wildlife, coordinate with the lessees, when possible, so that the advance of drilling is concentrated and incremental across the project area (as opposed to scattered and continuous).
1068	If not then only the most environmentally advanced techniques should be allowed including the following. EnCana's Normally Pressured Lance Project sprawls across a vast stretch of prime wildlife habitat, including key sage grouse areas and the internationally famous pronghorn migration corridor from Grand Teton NP to Seedskadee NWR. Given the massive impacts to sage grouse and big game that have already been shown in the Pinedale Anticline and Jonah Fields, the needs of wildlife--not oil and gas companies--should take precedence here.
1068	In addition, the BLM should provide a corridor at least 2 miles wide where drilling and road construction are not allowed along the migration corridor for the Grand Teton pronghorn herd.
1069	Of particular concern are the impacts of a growing human population in this region. Anything Encana can do to ensure ethical citizenship among its workforce would be appreciated. This is not meant to disparage the oil and gas industry. But it is an opportunity for Encana to promote good stewardship. The Wyoming Game and Fish Hunter Education program is an excellent start. Hunting and recreating on Wyoming's public lands is one of the benefits of living and working in this area. But our mule deer, antelope, sage grouse, elk and moose are feeling the impacts of humanity.
1069	Of particular concern are critical winter ranges, migration routes, and breeding grounds. Perhaps Encana personnel can even help enforce protection of these areas by being the eyes and ears for the Game and Fish. Certainly Encana's resources can be tapped for research and habitat improvement projects.
1070	When reading any publishings, Encana's name has always been at the forefront of wildlife studies and impact on wildlife.
1075	I am sorry to hear that more drilling is being considered in the area of the pronghorn migration route. I hope that their route will not be blocked by all the activity. I hope you have wildlife in your best interest when you make this decision.
1077	The Jonah Field has already negatively impacted wildlife and wildlife habitat and ..... Any expansion will only further this damage.
1079	A 3 mile wide corridor along the migration route of pronghorn should be maintained.
1080	Also I'm concerned with impacts to big-game animals, since the mule deer populations have already been greatly impacted from the current energy development.
1082	..... and antelope migrations between Grand Teton national Park and Seedskadee National Wildlife Refuge, already impeded by the Jonah Field, could be blocked by the new project.
1085	The damage to wildlife is a tragedy. The nation's largest mule deer herd had been destroyed by the winter time activity of the two gas fields.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1085	I have hunted antelope and sage grouse for years inside the proposed area and have witnessed firsthand the declines related to the Jonah Field. The proposed area is now the winter range for sage grouse, mule deer, elk and antelope. This area has been utilized by the displaced herds that used to rely on the Jonah and Anticline areas for winter sustenance. Are we now going to kick them further south into less desirable areas.
1085	The animals will invade the farms in Farson to ravage their fields for food.
1089	Encana has not only concerned themselves with the well-being of the surrounding wildlife and takes measures to ensure that their habitat is not destroyed.
1090	When considering this project it is imperative to consider the needs of wildlife, particularly …….and pronghorn.
1091	Have any wildlife threshold triggers reviewed by the UW Co-op before being put in the Record of Decision. Lack of prior review - and too much operator input - made the PAPA wildlife matrix a mess.
1093	The Wyoming Game and Fish Department (WGFD) has identified several pronghorn antelope migration corridors in the project area as part of the landscape-scale pronghorn migration patterns from Grand Teton National Park to the Red Desert. Substantial research has been conducted on this antelope migration, which has been recognized both nationally and internationally for its significance and uniqueness. It is incumbent on the BLM to apply current and ongoing research to all management decisions in this area to ensure the best possible conservation of pronghorn migration corridors in the proposed NPL Project area.
1093	While crucial winter range for mule deer is not currently mapped in the proposed NPL Project area, increasing evidence suggests that areas not presently mapped as crucial winter range are becoming increasingly important as wintering mule deer have been displaced from crucial winter range in the Upper Green River Valley by widespread oil and gas development. Since the last mule deer winter range maps were compiled in 2006, tremendous changes have occurred in the Upper Green River Valley, and the BLM must consult with the WGFD and conduct or require additional research to accurately understand current mule deer use patterns throughout the Green River Valley. The Sublette mule deer herd has plummeted in number in the last decade. We believe the BLM should consider all impacts to mule deer at the landscape level throughout the entire Green River Valley and how potential additional impacts within the proposed NPL Project area will affect the herd over the long term.
1093	An estimated 300 – 350 elk reside in the NPL Project area. Elk residing in sagebrush habitat exhibit different needs and responses to disturbance than those found in forested habitats, potential impacts on elk must be thoroughly evaluated in the environmental impact statement. Elk migration patterns, sensitivity to road density and surface disturbances, potential impacts of poaching, calving cover, and winter habitat needs should be included.

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Comment Document Number	Comment
1095	The LaBarge Field has resulted in the blocking of an elk migration corridor, according to unpublished research by Dr. Fred Lindzey (Lindzey, pers. comm.). At the same time, mule deer populations wintering in the Pinedale Mesa area have declined by 60%, and pronghorn migrations have been forced to detour around the Jonah Field. Populations of white-tailed prairie dogs, a keystone species in sagebrush ecosystems, have been shrinking in the Pinedale Field Office in recent years. The direct loss and displacement of wildlife from these projects has been serious, but the operators of these fields have always insisted that these fields had a relatively compact footprint on the land, and because other surrounding areas (even though they may be of lower habitat quality, especially in the case of mule deer winter range) remain undeveloped and therefore the wildlife losses resulting from this drilling should be seen as acceptable.
1095	We are concerned that the proposed project will have major impacts to wildlife, over and above the impacts currently being suffered by wildlife populations as a result of current development.
1095	Elk. BLM should evaluate areas in the NPL project area which are crucial winter range for elk, and these lands should be excluded from surface-disturbing activities.
1095	Mule Deer. We are concerned that this project will have direct and cumulative impacts on mule deer herds, and that currently used winter ranges and migration corridors will suffer unacceptable impacts as a result. BLM should analyze mule deer habitat use throughout the project area and exempt crucial ranges and migration corridors from surface-disturbing activities.
1095	Pronghorn. We are concerned that the expansion of the Jonah Field into the NPL project area will interrupt migrations and degrade the crucial habitats for pronghorn, particularly the herd that migrates from Grand Teton National Park to Seedskadee NWR, the second-longest land mammal migration in North America. A great deal of effort has gone into the protection of other parts of this migration corridor, particularly in the Bridger-Teton national Forest and at Trapper's Point, in addition to private-lands conservation work north of U.S. Highway 191. It would be wasteful for BLM to approve a project that creates an industrial swath across the migration route, especially given that the pronghorn are already being displaced to detour around the Jonah Field. BLM should manage a swath at least two miles wide centered on the migration corridor for pronghorn migration, and exclude project roads and well pads from this corridor. Simply shutting down human activity during the migration season is not enough. Wintering and fawning areas as well as migration corridors intersecting the project area should be mapped and analyzed, and these areas should be withdrawn from eligibility for surface-disturbing activities.
1095	Raptors. The typical BLM stipulations for nesting raptors hinge upon Timing Limitations that extend from 800 to 1500 feet from raptor nests. These are inadequate to protect nesting raptors on two counts. First of all, the buffer size is too small: Two-mile buffers should be applied for nests used by the extremely sensitive ferruginous hawk, while one-mile buffers should be applied for other birds of prey. Secondly, the timing limitation stipulation is itself flawed because it allows wells to be constructed adjacent to raptor nest sites as long as construction/drilling activities are conducted outside the nesting season. Under these stipulations, once raptors return to nest sites following well construction, they are subjected to disturbance from vehicles and human presence likely to flush nesting birds from the nest and expose eggs or nestlings to death by overheating, cooling, or dehydration. No Surface Occupancy measures are the appropriate mitigation measure in the case of lands in close proximity to active or recently active raptor nests

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1095	Native fishes. We are concerned about the direct and cumulative impact of the project on native fish populations, particularly Colorado River cutthroat trout, roundtail chub, bluehead sucker, and flannelmouth sucker. We are concerned that spills of chemicals will make their way into local waterways. We are concerned that construction of roads and well pads in close proximity to stream courses will result in sedimentation that will choke spawning gravels and change stream morphology. The impact of this project on Green River fisheries deserves careful analysis.
1095	This project is proposed for a large swath of currently unfragmented sagebrush habitat. Serious habitat fragmentation resulted from the Jonah and Pinedale Anticline developments, and 4 well pads per square mile in part of this project area would also amount to major habitat fragmentation. BLM should also be analyzing impacts of this project on a regional scale, analyzing core habitat areas and connecting wildlife corridors that maintain dispersal ability and migration routes.
1096	EnCana's Normally Pressured Lance Project sprawls across a vast stretch of prime wildlife habitat, including key sage grouse areas and the internationally famous pronghorn migration corridor from Grand Teton National Park to Seedskadee National Wildlife Refuge. Given the massive impacts to sage grouse and big game that have already been shown in the Pinedale Anticline and Jonah Fields, the needs of wildlife--not oil and gas companies--should take precedence here.
1096	In addition, the BLM should provide a corridor at least 2 miles wide where drilling and road construction are not allowed along the migration corridor for the Grand Teton pronghorn herd.
1096	Has there been a wildlife survey/study conducted to determine exactly what species will be impacted and how?
1097	Encana's Normally Pressured Lance project is situated on one of the longest animal migration routes in all of North America. The pronghorn migration to its winter range is truly unique and deserves to be protected.
1097	The BLM should look at the disastrous effects of the Jonah Field on the deer herd (60 percent reduction) and deny this proposed expansion.
1098	The development of the Jonah Field and the Pinedale Anticline over the past dozen years has been nothing less than devastating and has directly caused massive impacts to antelope, deer and sage grouse populations. There is more than enough science to back up this statement. Hall Sawyer's multi-year study on the impacts of gas development on deer and antelope populations clearly outlines that gas drilling has taken an enormous toll on wildlife resources. It is your duty to make decisions based on information that includes the body of science that has been documented in the last 15 years associated with drilling in this area and from other areas throughout the Rocky Mountain region.
1098	The area under consideration is prime sage grouse habitat and includes the migration route for antelope moving between Teton National Park and the Seedskadee National Wildlife Refuge. To protect wildlife the BLM needs to require a surface density of no more than one well pad per square mile throughout the entire project.
1098	The BLM should provide a corridor at least 2 miles wide where drilling and road construction are not allowed along the migration corridor for the Grand Teton pronghorn herd.
1102	Recent scientific information including, but not limited to, the Sawyer et al. work on mule deer, Holloran, Naugle, Kaiser, ... Berger's work on pronghorn, and any new information that has been developed since the authorization of the Jonah II project decision that overlaps with the Normally Pressured Lance boundary.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1102	Inclusion of the .....and mule deer, North American Mule Deer Conservation Plan, Mule Deer Eco-regional Habitat Guidelines, state-wide Wyoming Mule Deer Initiative, ... as well as, specifics of how the Wyoming Game and Fish Department population objectives and strategies for wildlife published in the Comprehensive Wildlife Conservation Strategy are going to be achieved.
1102	Clear and accurate identification of migration routes for pronghorn and mule deer, any winter range and parturition areas for mule deer, pronghorn, and ..... and all actions that will be implemented to maintain functional migration routes and seasonal wildlife ranges.
1102	A rigorous and structured approach to impact analysis, monitoring, and mitigation should be implemented including an updated baseline inventory for all fish and wildlife resources (and their habitats), and ……
1102	Phased development should be implemented for this project given recent impacts to wildlife and .....– including impact thresholds based on science and stakeholder involvement that will sustain fish, wildlife (and their habitats), and ..... throughout all phases of development.
1102	In addition to the previous comments, the TRCP request that the BLM establish options that ensure responsible energy development in a way that sustains fish & wildlife. The TRCP's recommendations and priorities regarding management of fish and wildlife during energy development are organized under the five fundamentals of Funding, Accountability, Coordination, Transparency, and Science (FACTS). In 2006, the TRCP released the "FACTS for Fish and Wildlife," specific recommendations for balancing fish and wildlife needs with the development of energy resources. Revised in 2011, the current FACTS document updates those recommendations, expands their applicability to broader geographic regions, and addresses forms of energy development beyond traditional oil and gas. The FACTS principles allow for fish and wildlife stewardship through better policy and management during energy development. The FACTS recommendations are applicable, with few exceptions, to land and water, traditional or renewable energy, public or private lands, and infrastructure associated with development. They can increase our ability to responsibly manage fish and wildlife during energy development, balance competing values, become conservation stewards and ensure a future for our fish and wildlife populations. These practices – driven by the FACTS – will sustain and uphold our nation's shared natural resources and unique outdoor legacy.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1102	Accountability entails accepting responsibility for actions. On public lands, promises are made through various decision strategies and should be considered "contracts with the people" that mandate proper stewardship of the nation's lands and minerals. TRCP recommends that you: · Proactively address fish and wildlife management needs with a specific "conservation strategy" for each energy field or project. Finalize conservation strategies before development starts and specify recommendations and actions to minimize impacts and establish plans for mitigation, detailed monitoring and adaptive management. · Establish and update regularly a system of tracking commitments, in plans or agreements, along with any actions contrary to those commitments. · Ensure that laws, regulations and policies intended to conserve and protect fish and wildlife during energy development are not abdicated or abridged. · Utilize lease development plans or master lease planning to evaluate and address potential impacts to fish and wildlife prior to development. · Notify the public and allow public comment on energy development projects involving public lands or resources. Provide the public with information regarding modifications to current development plans.
1102	Coordination is essential in ensuring that fish and wildlife are properly managed, within and across administrative boundaries. All stakeholders must be involved, and experts that manage fish and wildlife at the local, state or national levels must be included in energy project planning and implementation. Coordination enables unanticipated or unforeseen actions that arise during development to be addressed in a timely and appropriate manner. A key stakeholder in the administration of public lands and fish and wildlife resources, the public must be included to build trust and brainstorm management tactics. TRCP recommends that you: · Foster broad-based coordination between fish and wildlife managers, landowners and affected stakeholders to ensure fish and wildlife sustainability. · Establish expanded coordination across geo-political boundaries between property owners (public and private). Ensure that managers consider the crucial habitats as well as movement or transitional corridors of fish and wildlife. · Coordinate among all affected stakeholders during planning and implementation of public-lands energy projects. · Include state fish and wildlife agencies in energy development planning and the monitoring of fish and wildlife during and after development. · Establish a process for annual review and adjustments of actions that affect fish and wildlife. An adaptive management strategy is appropriate if based on established adaptive management guidelines and science.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1102	Transparency is essential to building trust among stakeholders and the general public. Transparency can prevent unnecessary delays, legal actions or bad press. Openness during energy development enables fish and wildlife management that benefits all stakeholders, not just project proponents. TRCP recommends that you: · Identify "special places" with exceptional resource concerns or values where energy development should not be allowed. Map these locations and incorporate these values into management plans. · Provide up-to-date information through a range of media and informational outlets to the public and fish and wildlife managers regarding energy development projects. · Direct and manage leasing and development using complete and up-to-date baseline information on fish and wildlife resources. · Utilize coordinated plans for energy development and fish and wildlife management. · Provide the public with information about all proposed public-lands energy leases and development; allow sufficient time for public comment. · Ensure that all meetings related to public-lands use and energy development become part of the public record.
1102	Science is the foundation of sustainable land and resource management. It is essential to understanding how fish and wildlife react to energy development and maintaining sustainable populations during and after development. Utilizing peer reviewed and published science enables a balanced approach that sustains both energy AND fish and wildlife instead of either energy OR fish and wildlife. TRCP recommends that you: · Utilize science, including the most current published science in all fish and wildlife decisions, particularly when specific research has been conducted on the impacts of energy development. Assure that mitigation and monitoring based on new scientific information is implemented in the energy development process. · Incorporate science-based mitigation, using tested and proven methods of adaptive management when making decisions about fish and wildlife management and energy development. Identify and address "gaps" in science prior to development and implement coordinated research to address these gaps. · If necessary, utilize a third-party review of development and mitigation proposals. · Establish a credible and qualified "science review team" and engage science-based organizations for fish and wildlife management and development decisions. · Establish a process to incorporate new information and science into planning and implementation of existing and new energy projects.
1103	The pronghorn migration route must be protected, as well as the core sage grouse areas.
1104	The proposed project is located within the Sublette Pronghorn Herd Unit, which encompasses 10,546 square miles and is managed for a population objective of 48,000 animals. A significant amount of new pronghorn data has been collected within the NPL project boundary and surrounding areas during the past 5 years, primarily associated with a recently completed research project conducted by the Wildlife Conservation Society (WCS). Pronghorn data derived from this WCS study along with data collected from other sources (agencies, consultants, etc.) indicate significant pronghorn winter use within portions the NPL project area. Pronghorn location data has been obtained by aerial flights, ground surveys, and radio-telemetry collars (both VHF and GIS technology). With the information derived from this data, we will begin updating existing seasonal range maps by the spring of 2012, which will result in new crucial winter range designations within the PL project boundary.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1104	The dominant habitat type associated with NPL is sagebrush/grassland habitat. As a result, other sagebrush dependent species, such as the sage thrasher, sage sparrow, and Brewer's sparrow exist throughout the entire NPL project area. Fragmentation of this relatively contiguous sagebrush habitat has the potential to impact all sagebrush dependent species, along with numerous other wildlife species.
1104	Development, production, and maintenance activities on pronghorn on summer, spring, fall, winter, and crucial winter range.
1104	Development, production, and maintenance activities on big game migration corridors.
1104	Development, production, and maintenance activities on sagebrush dependent, non-game species.
1104	In addition, we recommend that all known "best management practices", including the practices outlined in our Commission approved Recommendations for Development of Oil and Gas Resources within Important Wildlife Habitats (version 6.0), are indentified in the EIS alternatives to minimize habitat fragmentation and disturbance for the benefit of all sagebrush dependent species.
1104	We recommend No Surface Occupancy (NSO) stipulations be considered, as well as timing stipulations to prevent habitat loss or displacement of wildlife from crucial habitat.
1104	We recommend consideration be given to developing alternatives that range from minor to severe impacts on big game species in the project area.
1104	Amphibian surveys should be conducted prior to disturbance.
1104	All compressor engines/exhaust stacks should be adequately muffled to reduce noise impacts to wildlife,
1104	Compressor station doors should be kept closed to reduce noise. To minimize the effects of continuous noise on sage-grouse and nongame bird populations, reduce noise levels to 49 dBA or less, particularly during the bird nesting season when aural cues are critical for successful breeding.
1104	Well sites should be inventoried for nongame wildlife prior to development.
1104	We recommend well sites should be located away from ridge tops and saddles to minimize disturbance to wildlife in adjacent drainages. Where possible, use topography to provide visual barriers and avoid locating wells in key migration corridors, breeding areas, or winter concentration areas for wildlife.
1104	Areas where appropriate, water-bearing strata are discovered during exploration that could provide permanent water sources may be developed for wildlife use.
1104	We urge caution in constructing wells and tanks on crucial winter range to avoid concentrating livestock, potentially reducing forage, and increasing the potential for introducing noxious weeds.
1104	In order to minimize disturbance to wintering big game, we recommend that construction and drilling activities cease in crucial winter habitat from November 15 - April 30.
1104	We recommend vehicle travel should be minimized between 6-9 a.m. and 3-6 p.m. to prevent harassment and collisions with wintering wildlife.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1104	We suggest planning new roads away from drainages to reduce erosion potential. Consider placing roads adjacent to fences or other natural breaks in the landscape to reduce disturbance to wildlife. Construct roads to minimum standards and avoid wetlands, prairie dog towns, raptor nests, and sage-grouse leks.
1104	Excessive densities of roads that are open could pose major impacts to wildlife. We recommend there be no more than 1-1.5-miles of open roads per square mile. In addition, there should be seasonal closures on designated new roads during hunting seasons. In areas managed to maintain effective elk habitat, open road densities should not exceed 1/2 mile per square mile.
1104	Speed limits should be restricted to minimize collisions with wildlife and to keep dust down. When appropriate, use dust suppression techniques to avoid reducing productivity and palatability of adjacent forage.
1104	In deep snow conditions that require winter road maintenance, we request blading turnouts on both uphill and downhill sides of the road at one-mile intervals and at known game crossings to allow wildlife escape routes.
1104	Once into the production phase, limiting visits to well sites on crucial winter range to times when big game are typically bedded (i.e., mid-day) will reduce disturbance and stress on wildlife. We support the proponent's proposed use of remote sensing technology to reduce daily/weekly truck traffic for well servicing.
1104	Pipeline construction should be synchronized with seasonal wildlife needs to minimize disturbance. When appropriate, seasonal stipulations should be applied.
1104	The Green is managed primarily for its wild brown trout fisheries. Cutthroat trout are stocked in the lower portion of the river to provide additional diversity to the fisheries. Native nongame fish are also present in these watersheds. Of most importance are the flannel mouth sucker and the bluehead sucker. The WGFD has categorized both the flannelmouth sucker and bluehead sucker as a Species of Greatest Conservation Need (SGCN) Native Species Status (NSS) I in its State Wildlife Action Plan (SWAP). NSS I species are physically isolated and/or exist at extremely low densities throughout their range, and habitat conditions are declining or vulnerable. Therefore, we have been directed by the Wyoming Game and Fish Commission (WGFC) to recommend that no loss of habitat function occur. Some modification of the habitats may occur as a result of this project, however, we recommend that habitat function be maintained (i.e., the location, essential features, and species supported remain unchanged).
1104	The drainage also supports native fish species that are more common and abundant across their range, including mountain suckers, mottled sculpin, and speckled dace.
1104	Additionally, disturbance to amphibian breeding areas, especially those of the Great Basin spadefoot, is a concern. Spadefoots breed in playas, ephemeral pools, and flooded wetlands.
1104	Our concerns include impacts to aquatic ecosystems as a result of increased sedimentation, stream channel crossings, the introduction and transportation of aquatic invasive species (AIS), water quality, and the disturbance of riparian habitats and wetlands associated with this project.
1104	Impacts to wetlands and associated wildlife species, particularly amphibians and reptiles.
1104	Direct impacts (i.e., direct kill of fish species, direct kill of eggs and fry, indirect kill of eggs and fry) to populations and habitats for bluehead sucker and flannelmouth sucker along with the important sport fish.
1104	Alterations of upland habitats and its impact on amphibians and reptiles.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1104	Buffer zones of 500 feet or the 100-year floodplain of undisturbed vegetation should be left along each side of standing waters and water courses to minimize sedimentation and direct fish habitat impacts.
1104	Hydrostatic test waters released during pipeline construction could cause the alteration of stream channels, increased sediment loads, and the introduction of potentially toxic chemicals into drainages, thereby resulting in adverse impacts to aquatic biota. Furthermore, release of water into drainages other than the source drainage can result in an unacceptable risk of introducing AIS (New Zealand mud snail, European ear snail, whirling disease spores, etc.). Introduction of AIS can be devastating to the ecosystems of vast basins in the receiving waters. To minimize impacts, we recommend the direct discharge of hydrostatic test waters to streams other than the source water be avoided. Failure to do so could be seen as a violation of WGFC regulations. Discharge should occur into the source drainage in a manner that does not increase erosion or alter stream channels. Discharge should occur into temporary sedimentation basins and the dewatering of temporary sedimentation basins should then be done in a manner that precludes erosion.
1104	To reduce impacts on aquatic amphibians hibernating in aquatic substrates, we recommend limiting construction through the winter months. However, if construction is to take place during the winter months, the proponent should take into consideration the herptile assemblages in the project area to ensure suitable overwintering habitat (soft unconsolidated substrates) is protected.
1104	To protect breeding amphibians we recommend no disturbance in the riparian, wetlands, or backwater areas during the spring and early summer. The Department recommends a 500 meter NSO buffer for riparian areas and wetlands.
1104	Minimize disturbance to snake hibernacula. When possible, we recommend avoiding disrupting talus slopes, caves, and cliffs. If work needs to be performed in areas adjacent to these habitat types, we recommend a 100 meter buffer be placed around hibernacula features. Work should be performed during the summer months (June I - August 31) to avoid the disruption of hibernating reptiles.
1104	No instream work in the rivers (including the Green and New Fork rivers) from September 15 - February 15 to protect spawning brown trout, their redds, and fry. This timeframe protects the incubating eggs and the fry.
1104	No instream work in the rivers (including the Green and New Fork rivers) during the months of April - July to protect spawning flannelmouth suckers and bluehead suckers and their fry.
1105	This project will complete the destruction of the …….. mule deer, and pronghorn populations and migration corridors already impacted by current drilling activities, and …….
1106	EnCana's Normally Pressured Lance Project cannot help but impact wide stretches of our prime wildlife habitat. Like everyone, I am well aware of .....and the highly sensitive and constricted critical pronghorn migration corridor from Seedskadee National Wildlife Refuge to Grand Teton National Park. The Pinedale Anticline and Jonah Fields have clearly had a significant impact on our wildlife and government action should err on the side of wildlife protections versus desires of the oil and gas companies.
1106	provide a miles wide corridor free from drilling and road construction that protects the migration corridor for the Grand Teton antelope herd,
1108	2. Relegation and mitigation work that enhances the area to support antelope in winter as much of this area is antelope and ….. country.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1108	3. Enhanced efforts to protect migrating birds from using the surface shallow pits where toxins are stored and can harm wildlife and migratory birds.
1108	4. Recognition of the area as possible habitat for prairie dogs and thus supporting wildlife such as the mountain plover and the black -footed ferret.
1108	5. Inclusion of water enhancement potholes to provide wildlife with water and thus offset the disturbances due to roads and well pads.
1108	6. Recognition of the wildlife corridor use by antelope, deer elk and other wildlife.
1108	8. Possibility of electrifying the field with towers that prevent loss of migratory raptors.
1109	We also request that BLM consider how the NPL area could be planned to retain ecosystem connectivity for all sagebrush-dependent species.
1109	The NPL project area contains an important migratory area for pronghorn that travel through the Greater Green River Basin as far north as Grand Teton National Park in the longest terrestrial migratory pathway in the Western Hemisphere outside of Alaska. We request that this pathway be avoided by developmental infrastructure of all kinds, including powerlines, pipelines, compressor stations, produced water facilities, etc.
1109	We request that BLM conduct an inventory and habitat assessment of the desert elk herd in the NPL area, and make this information publicly available.
1109	We ask that BLM require avoidance of important areas where elk winter in the NPL, to prevent habitat fragmentation and avoidance.
1109	We request that BLM require pitless development at all well sites to prevent bird mortality.
1109	We request that BLM work with USFWS to enforce NPL and area-wide prevention of disturbance to foraging areas, to preserve these important sites for eagle sustainability during all annual cycles, not just during nesting season. The Bald and Golden Eagle Protection Act provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." For purposes of these guidelines, "disturb" means: “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior." In addition to immediate impacts, this definition also covers impacts that result from human induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagle's return, such alterations agitate or bother an eagle to a degree that interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment.
1113	Wild life, not oil and gas should be given greater consideration.
1113	Protect a migration corridor at least 2 miles wide where drilling and road construction are prohibited.
1115	…….. and the effect on the wild life, that it was said would not be effected.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1116	First, please include Highway bridges and underpasses for use as wildlife crossings, most likely with the Jonah and Anticline Operators as funding partners as they are also responsible for much traffic, to mitigate the carnage and interference with wildlife along Highway 191 and possibly 189. This measure has been used with great success in other parts of the state and given the decimation of the Mule Deer in the area, is absolutely necessary. In addition to the obstruction of wildlife activity, winter grounds and migration, there is a huge toll in road kill. In fact, on one trip north, I counted no less than six carcasses in a roughly one mile stretch between Farson and Luman Road.
1118	Encana has been and is a leader in gas production and transportation and continues to promote the methods of development that clearly lessen the impact on our Wyoming wildlife and habitat.
1120	At the meeting, I asked about wildlife corridors and they told me this information was unknown at the time.
1120	Does any of this project area overlap with mule deer or antelope wintering grounds?
1121	The restrictions are imposed to reduce human intrusion on big game during the winter and spring. There is a genuine scientific controversy about the rationale, as it applies to winter areas. Research shows that after initial construction big game return to the area. See Taylor, R. 2006. As more data is developed, waivers should be granted based on a broader view of the science and current game and wildlife numbers.
1123	The NPL Project would be constructed in important big game and greater sage grouse habitats. As the enclosed map shows, much of this area is a sage grouse core area, and pronghorn migration corridors traverse this area. Exhibit 1. [[Exhibit 1.Figure entitled "Greater sage-grouse core habitat and pronghorn migration routes in and near the proposed NPL project area". Data Sources; WGFD.WOGOC, ESR, Nathan Maxon, Wyomlng Outdoor Council, May 4, 2011]]
1123	Exhibit 1.Figure entitled "Greater sage-grouse core habitat and pronghorn migration routes in and near the proposed NPL project area". Data Sources; WGFD.WOGOC, ESRI, Nathan Maxon, Wyoming Outdoor Council, May 4, 2011
1123	Relative to pronghorn, as the enclosed map shows, Exhibit 1, the Wyoming Game and Fish Department has mapped several pronghorn migration routes in this project area. We also direct the BLM to the Master of Science Thesis prepared by Daly Sheldon at the University of Wyoming entitled "Movement and Distribution of Pronghorn in Relation to Roads and Fences in Southwestern Wyoming" (2005), which also demonstrated that pronghorn migration routes are found in the eastern portion of this area. The BLM should strongly consider the research that has been conducted by Dr. Kim Berger and others regarding the effects of gas field development in the Upper Green River Valley on pronghorn. Their report is available at http://www.blm.gov!pgdata/etc/medialib/blmlwy/information! NEPA/pfodocs/antic line/revdr-comments/eg.Par.82689.File.datJ02. The BLM should apply this research, subsequent publications prepared by these authors, and the findings of current research by others to assure the best possible conservation of pronghorn migration corridors in the NPL Project area. Given the epic and striking pronghorn migration patterns from Grand Teton National Park to the Red Desert that these local migrations corridors are part of, protecting these corridors has far more than local significance. Their significance is at least national and perhaps even internationals in scope, as shown by the vast number of publications that have appeared regarding the Grand Teton to Red Desert pronghorn migration. The BLM should approach antelope conservation in the NPL Project environmental impact statement from this perspective.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1123	Furthermore, with respect to the conservation of all big game species, including pronghorn, the BLM should fully consider and abide by the Wyoming Game and Fish Department's mitigation measures found in its report "Recommendations for Development of Oil and Gas Resources Within Important Wildlife Habitats" (March 2010). This report is available at http://gf.state.wy.us/downloads/pdf!og.pdf. As just mentioned, as will be discussed in the next section on the duty to minimize environmental impacts, not only does BLM have authority to require these measures it in fact has an obligation to do so, even if current stipulations do not specifically provide for these measures.
1123	According to the Wyoming Game and Fish Department's crucial winter range map for mule deer, no crucial winter range is found inside of the proposed NPL Project area. At first blush this seems to be the end of the matter, but several factors indicate that wintering mule deer may be a concern within the NPL project area and deserve scrutiny in the NPL project environmental impact statement. First, as oil and gas development continues to expand throughout much of the Upper Green River Valley, especially within mule deer crucial winter range, it seems likely that other areas not mapped as crucial winter range by Wyoming Game and Fish Department have or will become increasingly important for wintering mule deer.3[[Footnote 3:For example, in light of the recent and significant decline of mule deer use on the Mesa and the apparent increase in mule deer use in the Ryegrass/Soapholes area, researchers suggested that" it is possible that [Ryegrass/Soapholes] now retains deer that previously would have moved on to the Mesa." Sawyer, H. and R. Neilson, Mule Deer Monitoring in the Pinedale Anticline Project Area: 2010 Annual report. Western Ecosystems Technology, Inc. Cheyenne, Wyoming.]] As depicted in Exhibit 2, the proposed NPL project area has few existing gas wells and may be important for wintering mule deer that have or will be displaced by oil and gas activities elsewhere, especially those activities within the mapped crucial winter ranges near LaBarge and Big Piney. The Wyoming Game and Fish Department last updated the mule deer crucial winter range maps in 2006 and because major changes have occurred in the Upper Green River Valley since that time BLM should consult with the fish and game agency and conduct additional research to ensure that this environmental impact statement reflects current mule deer use.
1123	Exhibit 2. Figure entitled "Mule Deer crucial winter range and active oil and gas wells near the proposed NPL project area". Data Sources; WGFD.WOGOC, ESRI, Nathan Maxon, Wyoming Outdoor Council, May 4, 2011.
1123	Second, despite not being mapped as crucial winter ranges, Reardon Draw and Chapel Canyon are both known to be important areas for wintering mule deer and mule deer have been observed migrating along the western boundary of the project area.
1123	Finally, it is unclear to us whether portions of the NPL Project area are considered severe winter relief(SWR) areas for mule deer, but such areas, if present, are important because they provide habitat during extremely severe winters. Exhibit 3, p. 4. It is important to note that SWR areas do not necessarily overlap with crucial winter ranges and should be considered separately from them. Id.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1123	Exhibit 3. FINAL-JULY 1990 Wyoming Chapter of the Wildlife Society Report on Standardized Definitions for Seasonal Wildlife Ranges. "The Wyoming Chapter of The Wildlife Society (TWS) formed a committee to review, discuss and address the current Standardized Definitions for Seasonal Wildlife Ranges developed by the Chapter between 1984 and 19B6 and subsequently adopted for Wyoming by the Soil Conservation Service (SCS), Bureau of Land Management (BLM) , Forest Service (FS), United States Fish and Wildlife Service (USFWS) and the Wyoming Game and Fish Department (WGFD). The request, received from the WGFD and BLM, was to review the current standards, address criteria for quantifying the seasonal range definitions, develop necessary modifications and make recommendations.
1123	The Sublette mule deer herd has a national significance, it draws hunters to this region of Wyoming from across the country because of its famed trophy mule deer. In addition, this herd provides a sustainable boost to the local economy through hunting related expenditures for food, fuel, lodging, guide services, taxidermy, and meat processing. The continuing decline of this herd has been a cause for alarm among hunters, conservationists, and wildlife managers for the past twenty years. Because the impacts from the proposed NPL Project are unclear, we ask BLM to fully consider all of the potential impacts to mule deer that are or may be using BLM lands within the proposed NPL Project area.
1123	Based on discussions some of our members have had with BLM wildlife biologists, it appears that there are resident elk in the NPL Project area. There are apparently two herds, one of about 200 animals that originated in the Wind River Mountains, and the other of about 100 to 150 animals that is found in the Buckhorn Canyon area. Because these animals are found in sagebrush habitats and not forested habitats, the BLM should fully consider this in the environmental impact statement. We specifically direct BLM to the research of Dr. Hall Sawyer that was done on the elk herd in the Jack Morrow Hills area, another area of predominantly sagebrush habitat. That work is enclosed as Exhibit 4. At a minimum the BLM must adhere to the mitigation measures found in the Wyoming Game and Fish Department's Recommendations for Development of Oil and Gas Resources report so as to ensure adequate conservation of this elk herd.
1123	Exhibit 4. Research Article: "Habitat Selection of Rocky Mountain Elk in a Nonforested Environment."
1124	Encana is committed to wildlife protection by improving wildlife habitat within project areas and protecting big game migration corridors.
1126	Big game habitat and migration corridors will be protected~
1128	Discuss new antelope studies and ongoing deer migration work
1129	The NPL project is area is located within some of the best fish and wildlife habitat in the West; it is also adjacent to what is already one of the nation’s largest natural gas plays. Fish and wildlife have suffered as a result of the development that has taken place within the Jonah and Anticline project areas. However, the experience with development in the area has helped us learn how we can more effectively reduce impacts from development through careful planning, analysis and development techniques. With this in mind we offer the following recommendations for analysis that should be completed during the EIS process as well as several development practices that we believe can help reduce impacts to fish and wildlife.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1129	In addition to the obvious air quality concerns, it is also of particular concern to TU from a fisheries aspect. The potential for water quality impacts and eventual declines in water quality to a coldwater fisheries system, such as those in the Green River and New Fork River, from poor air quality and pollution depositions impacts coldwater fisheries, adjacent riparian and stream vegetation, and aquatic insect life.
1129	Big game will once again be impacted by the development of this proposed natural gas field. In spite of the proposed plans to limit the number of well pads per section, the plan calls for 3,500 additional wells being drilled in critical range for mule deer and pronghorn antelope. Additionally, impacts could affect the moose population which inhabits the Green River and New Fork riparian areas.
1129	The EIS must include the latest revised Wyoming Game and Fish "Recommendations for Development of Oil and Gas Resources in Crucial and Important Wildlife Habitats" (2010). New data based on research efforts must be incorporated into the EIS and mitigation plans, including newly identified habitat use areas, transition areas, offset implications, and timing restrictions.
1130	The 2006 Wyoming Game and Fish Department (WGFD) maps do not include mule deer or elk. However, Reardon Draw and Chapel Canyon can identify potential big game use. Other developments in the area (i.e. Pinedale Anticline, Cimarex Helium Plant, LaBarge Infill Project) may be relocating wildlife species to habitats within the proposed project area.
1130	Encana and the BLM should coordinate with WGFD to utilize recommendations, including the 2010 WGFD Recommendations for Development of Oil and Gas Resources within Important Wildlife Habitats, in evaluating the impacts associated with this project.
1130	According to WGFD 2006 data, five Pronghorn migration routes exist along with summer, spring, and fall habitat. A small portion in the southeast corner contains yearlong winter range. This development would increase the bottleneck strain already present for the pronghorn herd. Avoidance of negative impacts like development within migration corridors and stopover points including roads, well pads and support facilities, is essential. The ability to move freely between seasonal habitats is crucial to the long-term health and survival of big game. Berger et al. 2006 and 2004 provides data that shows Pronghorn are especially vulnerable to energy development located within migration corridors.
1130	As the BLM develops the draft and final EIS, the BLM needs to identify the impacts from increased human activity to wildlife. Increased human activity elevates the potential for wildlife harassment, poaching, or vehicle collisions.
1130	Identify how Encana will protect big game habitat and migration corridors.
1130	Work with Wyoming Department of Transportation to create over or under passes that wildlife can use to migrate safely through Highway 191, Highway 189 and Highway 351. This is an extremely important step in reducing vehicle collisions (both a human and wildlife safety concern) and bottleneck issues the pronghorn herd is confronted with. Overpasses and underpasses for pronghorn to migrate with more ease are warranted.
1130	Acknowledge in the draft and final EIS habitat fragmentation impacts and attempt to quantify them.
1130	Incorporate the most current and relevant scientific data that analyzes wildlife impacts related to mineral extraction development and production.
1130	Establish an action plan for the potential loss of existing pronghorn migration corridors.

Table E-2. Scoping Comments by Issue Category

Comment Document Number	Comment
1130	Provide an environmental compliance plan that clearly states how the BLM will enforce monitoring, environmental compliance and remediation on wildlife affected by oil and gas developing in the project area. This plan should be developed on a landscape scale level to determine management options for wildlife species. Avoiding wildlife hot spots, such as migration corridors and stopover points.
1130	Avoid migration corridors, leks, brooding grounds, and stop over points when determining where to place well pads, roads, and support infrastructure. Animal displacement is a real possibility when developing 3,500 wells within big game and Greater sage grouse habitat.
1130	Conduct inventories of wildlife habitat and species to determine baseline data prior to development.
1130	Identify thresholds for wildlife populations and map out mitigation measures.
1130	Provide a thorough research inventory on the latest impacts to wildlife from oil and gas development.
1130	Identify significant migration corridors with modeling of scenarios that may occur should migration corridors be fragmented or lost.
1130	Present an analysis of the development plan with seasonal timing restrictions as they apply to all wildlife species.
1130	Evaluate habitat competition among various wildlife species when habitat loss and fragmentation occurs.
1130	Establish thresholds for wildlife impacts that will include indicators, a policy to mitigate or curb the impacts, and prevention methods to maintain population numbers.
1130	The flow of the stream also changes, which can lead to erosion and fewer areas for spawning fish.
1130	Highly mineralized water produced in significant quantity and released to adjacent small surface watercourses and streams will result in significant changes to …….related aquatic and riparian biological resources.
1131	EPA recommends the Draft EIS disclose the extent to which aquatic habitat could be impaired by potential activities, including effects on surface and subsurface water quality and quantity, aquatic biota, stream structure and channel stability, streambed substrate, including season and spawning habitats, stream bank vegetation, and riparian habitats.