

Scoping Report

for

The Desolation Road Natural Gas Development Project

August 2015



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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**U.S. Department of the Interior
Bureau of Land Management
Rock Springs Field Office
Wyoming**

1.0 INTRODUCTION

In October 2014 the Bureau of Land Management (BLM) Rock Springs Field Office (RSFO) received a proposal from Samson Resources to develop up to 17 natural gas wells on up to 5 well pads in the Desolation Road Unit in southeast Sweetwater County, Wyoming. The entire project area is in close proximity to the Adobe Town Wilderness Study Area (WSA) and is entirely within the Monument Valley Management Area.

In compliance with the National Environmental Policy Act (NEPA) the BLM RSFO provided an opportunity for public comment on the proposed project from October 10 to November 14, 2014. This public comment period is typically referred to as “scoping.” The purpose of this document is to compile, summarize and disclose the comments received during this scoping period.

In July 2015 Samson Resources sold the Desolation Road Unit to Mustang Resources who is the current Unit Operator and the new project proponent for the Desolation Road Natural Gas Development Project.

2.0 SCOPING PROCESS

On October 10, 2014 the BLM RSFO provided a press release to a wide variety of local news sources. On that same day the BLM RSFO also sent scoping letters to 66 individuals/organizations who had expressed an interest in project proposals in this area. Six of those letters were returned to the BLM as undeliverable. Copies of the press release and the scoping letter may be found on the project website:

http://www.blm.gov/wy/st/en/info/NEPA/documents/rsfo/Desolation_Plan.html

In addition to these measures the BLM RSFO held two public scoping meetings for this project. The first meeting was held on October 28, 2014. This meeting was held from 3:00 pm to 6:00 pm at the Jeffery Center in Rawlins, Wyoming. One individual attended this meeting and provided no written comments. The second meeting was held on October 29, 2014. This meeting was held from 3:00 pm to 6:00 pm at the BLM office in Rock Springs, Wyoming. Eight individuals attended this meeting and provided no written comments.

3.0 SCOPING COMMENTS

A total of 19 individuals/organizations participated in the public comment period providing a total of 140 comments. Twelve of the commenters submitted their comments via email. Seven commenters submitted their comments via mail. Comments were received from individuals, businesses, special interest groups, state agencies and city and county governments (see Table 1).

Table 1. Number of Comment Documents Received by Affiliation

Commenter Affiliation	Number of Comment Documents
Individual	9
Interest Group	4
Business	3
County or City Government	2
State Agency	1
Federal Agency	0
Other	0
Total	19

Approximately 84 percent of comment documents were received from cities and towns in Wyoming, and 16 percent were received from locations out of state (see Table 2).

Table 2. Number of Comment Documents Submitted by Geographic Location

Location	Number of Comment Documents
Casper, Wyoming	1
Cheyenne, Wyoming	2
Douglas, Wyoming	1
Green River, Wyoming	2
Lander, Wyoming	1
Laramie, Wyoming	1
Rock Springs, Wyoming	8
Denver, Colorado	1
Denton, Texas	1
Elkhart Lake, Wisconsin	1
Total	19

Of the 19 comment documents received 12 were generally in favor of the proposed development while 6 were generally opposed to the proposed development. One comment document did not specify general favor or opposition to the development, but rather provided recommended mitigation measures if the proposed development were to occur.

3.1 Comment Submittals by Comment Category

The BLM identified 140 individual scoping comments covering a broad range of comment categories. Table 3 summarizes the number of scoping comments identified by comment category. The greatest number of comments within the scope of this project was associated with Wilderness Values (29); Policies, Regulations and Permitting (20); Visual Resources (15); and Mitigation (14).

Table 3. Number of Comments per Comment Category

Comment Category	Number of Comments
Wilderness Values	29
Policies, Regulations and Permitting	20
Visual Resources	15
Mitigation	14
Wildlife Resources	10
Socioeconomics	8
Land Designations	7
Cultural and Historical Resources	6
Water Resources	6
Oil and Gas Operations	4
Sage-grouse	4
Size and Scale	4
Reclamation	3
Global Climate Change	2
Invasive Species and Pests	2
Paleontological Resources	2
General Opposition of Proposal	1
General Support of Proposal	1
Level of Controversy	1
Recreational Resources	1
Total	140

3.2 Summary of Comments

This section summarizes comments submitted during scoping that were within the scope of the project NEPA analysis. Comment summaries are grouped into comment categories based on the content and substance of the comment. Appendix A contains the text of all individual comments extracted from the comment documents. The BLM's receipt and summarization of scoping comments do not constitute agreement or disagreement with the content of the scoping comments. The purpose of this report is to represent the issues raised in the scoping comments for consideration during the NEPA process. Comment categories are presented hereafter in the order shown in Table 3.

Wilderness Values

A number of commenters pointed out that the proposed project is entirely outside of the Adobe Town Wilderness Study Area (WSA) boundary. One commenter expanded on this concept by pointing out that in order for such boundaries to hold any meaning then development clearly outside of the protection area must be allowed to commence.

In contrast, other commenters staunchly opposed any construction in near proximity to the Adobe Town WSA. Some commenters identified the project to be within Area A of the Adobe

Town Citizens' Proposed Wilderness Area. A number of commenters also stated that the BLM had previously identified the project area as having wilderness qualities. Concerns were expressed that development as proposed would have an impact on wilderness qualities in the area. Impacts to these qualities should be avoided, but if they cannot they should be properly mitigated. Some expressed that an Environmental Impact Statement (EIS) would be required to adequately analyze and mitigate impacts to wilderness values. One commenter mentioned the need for BLM to ensure that development from this project be in conformance with the non-impairment standard as described in the WSA Manual.

Some commenters were concerned that approving development in this area before the BLM publishes its Lands with Wilderness Characteristics inventories could alter the outcome of those inventories. One commenter expressed that the BLM would need to update and publish its Lands with Wilderness Characteristics inventory for this area as part of this project. Concern was also raised that allowing development at this time could limit BLM's ability to analyze and provide additional protective measures for this area in the forthcoming Resource Management Plan (RMP) that is currently in development.

The following alternatives were proposed in relation to wilderness values:

- Heliportable Drilling
- Oak mats in lieu of access roads and constructed well pads
- Siting wells to avoid impacts to lands with wilderness characteristics
- Siting wells to minimize impacts to the wilderness experience in the WSA
- Phased development where wells would be drilled further away and out of sight from the WSA boundary first and then only developed nearer to and within sight of the WSA if determined to be absolutely necessary for the development of the unit.

Policies, Regulations and Permitting

A number of comments discussed BLM's multiple use mission. One group of commenters focused on energy development as part of the multiple use mission and expressed that proceeding with this development would help BLM meet its mission objectives. Another group of commenters expressed concerns that allowing development as proposed would destroy some resource values, thereby failing to meet BLM's multiple use mission objectives.

Many of the comments associated with this category focused on the appropriate NEPA approach for this project. One group of commenters urged the BLM to issue a Finding of No Significant Impact (FONSI) after completing an Environmental Assessment (EA). Another group of commenters expressed that an EIS would be required in order to adequately analyze and disclose the potential impacts associated with this proposed project.

A few comments discussed more specific NEPA procedures, such as preparation of the Purpose and Need, and the No Action alternatives. One comment expressed that the project proponent's purpose and need must be considered when developing alternatives. Emphasis was placed on selecting alternatives that were economically feasible and reasonable for the proponent. Another comment expressed that the No Action alternative should not represent denial of the proposed

project, but rather continuation of status quo development in the area. Some commenters expressed concerns that BLM could not adequately analyze impacts from the three well locations that have not yet been specifically identified. A conservative analysis approach was recommended by one commenter to ensure the NEPA analysis adequately addressed potential impacts from the unspecified well locations.

Some comments discussed existing lease rights and reminded the BLM that these rights must be considered in the NEPA analysis. Alternatives that would violate valid and existing lease rights should not be included in the analysis. In contrast to this, another commenter expressed that the validity of the existing leases should be examined as part of this NEPA analysis. A comment also encourages the BLM to use its “extensive authority and discretion for managing development on existing leases.”

One commenter stated that the BLM needs to consider designating the project area as an Area of Critical Environmental Concern in the forthcoming RMP that is currently in development. They expressed concern that approval of this project could impact the BLM’s ability to provide adequate protective measures to the project area in the new RMP. One commenter suggested the analysis for this project be postponed until after the new RMP is completed.

One commenter mentioned the Mineral Leasing Act. They go on to state that while the Mineral Leasing Act allows for development of a well pad within a valid lease, it does not specifically confer the right to construct an access road to the well pad.

Visual Resources

A number of commenters expressed that the currently proposed measures to reduce impacts to visual resources (low profile tanks and site specific coloring of surface equipment) were sufficient to protect visual resource values. Other commenters were concerned that the project, as proposed, would have significant impacts on visual resource values in this essentially undeveloped area. One commenter identified the entire project area as a highly scenic area where they felt all construction activities should be avoided.

Some commenters mentioned the Monument Valley Management Area (MVMA) and pointed out some of the management objectives the BLM has established for this area in relation to visual resources (Class II Visual Resource Management (VRM)). They expressed that the project as proposed would not be in compliance with the management objectives of the MVMA. However, in contrast one commenter disagreed with the VRM Class II designation for the project area.

The following alternatives were proposed in relation to visual resource values:

- Heliportable Drilling
- Oak mats in lieu of access roads and constructed well pads
- The use of helicopter access or existing jeep trails for well site access
- Countersinking wellheads and all well site equipment below grade level
- The use of grade level abandoned well markers

- The use of camouflaged surface pipelines instead of buried pipelines
- Phased development where wells would be drilled further away and out of sight from the WSA boundary first and then only developed nearer to and within sight of the WSA if determined to be absolutely necessary for the development of the unit.

Mitigation

Most comments in this category discuss the use of mitigation measures generally, rather than listing specific mitigation measures. One group of commenters expressed that the currently proposed mitigation measures would be adequate to protect environmental resources. One commenter specifically mentions fencing off sensitive areas as an appropriate mitigation measure currently associated with the proposed project.

Other commenters encouraged the BLM to utilize various forms of mitigation; specifically: avoidance, minimizing on-site impacts and utilizing the BLM's interim regional mitigation guidance to mitigate impacts by off-site efforts. One commenter encouraged the BLM to utilize an article prepared by the Department of the Interior entitled "A Strategy for Improving the Mitigation Policies and Practices of the Department of the Interior."

The following alternatives/mitigation measures were proposed in relation to this category:

- Limit the footprint by co-locating facilities, regulating road construction and consolidating infrastructure
- Utilize existing pipeline corridors, roadways and right of ways
- Relocate all wells to the North, placing them closer to the existing access road.

Wildlife Resources

Commenters mentioned pronghorn antelope, mountain plover, raptors, white-tailed prairie dog, mule deer and sage-grouse in their comments. Some commenters felt that existing protective measures for wildlife (such as timing limitations) were adequate, while others expressed that more stringent protective measures were needed.

The following alternatives/mitigation measures were proposed in relation to wildlife resources:

- Restrict construction and drilling activities from November 15th and April 30th each year to protect Pronghorn Antelope Crucial Winter Range
- Implement appropriate timing restrictions and disturbance free buffers around raptor nests as prescribed by the Wyoming Game and Fish Department
- Apply wildlife timing limitations during all phases of well development including construction, monitoring and maintenance
- Conduct pre-disturbance ecological inventories to assure post-development ecological conditions are achieved in a way that retains or reestablishes wildlife habitat
- Restrict all development within 1 mile of the boundary of the Adobe Town WSA to protect the associated wildlife community.

Socioeconomics

All comments associated with this category focused on the benefits this project would represent for socioeconomics both locally and nationally. The primary themes discussed involved the contributions this project would represent to national domestic energy production, and the creation and maintenance of local jobs and associated contributions to the high standard of living that residents in the area enjoy. Benefits to national, state and local economies are mentioned repeatedly. Commenters also discuss the revenue this project would generate for national, state and local governments.

Land Designations

Most comments related to this category discussed the Monument Valley Management Area (MVMA). One commenter expressed that the existing surveys and mitigation requirements would be adequate to meet the management objectives and requirements of the MVMA. Other commenters expressed concerns that development within the MVMA could limit the BLM's ability to develop adequate protective measures for this area during the forthcoming RMP that is currently in development. Some comments specifically mentioned that the MVMA is a candidate for Area of Critical Environmental Concern (ACEC) status in the new RMP. They expressed concern that development within the MVMA could limit the BLM's ability to designate this area as an ACEC in the new RMP. One commenter recommended that significant mitigation measures be implemented, if the project is approved, to protect the resource values of the MVMA. Another commenter expressed concern that adequate mitigation would be very difficult in this area.

One comment mentioned the Very Rare or Uncommon Area designation that the Wyoming Environmental Quality Commission has given to this area. The commenter expressed concerns that development within this area would degrade the qualities that caused this area to be designated as Very Rare or Uncommon.

Cultural and Historical Resources

A number of commenters expressed that this proposal provides adequate protective measures for cultural resources. They felt that the required cultural surveys and avoidance tactics would protect resource values. In contrast, one commenter was concerned that this project could significantly impact historical properties, both directly and through impacts to the historic setting of the area. They expressed an expectation that the required cultural inventories occur in compliance with laws and regulations.

Water Resources

A number of commenters expressed that current measures will be adequate to protect groundwater resources. Some of the measures specifically listed in their comments include: background water quality sampling; the use of cement bonded steel casing; and the use of onsite water wells in lieu of water from streams/rivers. One commenter recommended that all

equipment should be serviced and fueled away from streams and riparian areas. They also recommended that equipment staging areas be at least 300 feet from riparian areas.

One commenter recommended that Best Management Practices (BMPs) be implemented to retain sediment and pollutants within the work area boundaries. Timely revegetation was also recommended to assist with preventing sediment movement off location.

Oil and Gas Operations

A couple of commenters expressed that current standard industry practices will provide adequate protection for resource values. The following examples were provided: phased development based on production success to ensure no drilling is being conducted needlessly; the use of drainage, spill prevention and reclamation plans; cement bonded steel casing; and proper disposal of cuttings.

One commenter expressed concerns with the potential environmental impacts associated with hydraulic fracturing. Adequate analysis in compliance with the NEPA should be conducted and disclosed in the project NEPA analysis. This commenter also expressed that this analysis should be in the form of an EIS.

Sage-grouse

A few commenters expressed that the proposed project should not negatively impact sage-grouse. They point out that the project area is not within sage-grouse core habitat, nor is it in close proximity to any leks. One commenter identifies an active sage-grouse lek adjacent to a proposed access road. This commenter mentions that the lek identified in the BLM scoping notice is identified in the wrong location. They identify the need to analyze non-core area stipulations such as a ¼-mile no surface occupancy area and a 2-mile seasonal restriction area in at least one of the alternatives.

Size and Scale

A number of commenters expressed that this project is very small in scale and that any associated environmental impacts would be very minor. One commenter pointed out that development would only continue in the area if the initial wells proved economically feasible. Another commenter mentioned that this limited project meets BLM's mandate for this area to "maintain or enhance opportunities for exploration and development while protecting other resource values."

Reclamation

One commenter identified that the proposal includes a reclamation plan that will control erosion and protect sensitive resource values. Another commenter emphasized the importance of reclamation to maintain a variety of resource values present in the area. They also recommended coordination between the project proponent and federal, state and local governments as well as the state university in planning and conducting reclamation activities.

One commenter expressed concerns that successful reclamation will be slow and challenging in this area. Low annual precipitation is provided as a primary factor that may limit reclamation success. The commenter expressed that reclamation is often unsuccessful in the project area. Concerns related to the spread of invasive species, such as halogeton, and their potential impact on reclamation success, were also raised. Overall the commenter was concerned that successful reclamation could take 75–125 years, which they felt was a significant environmental impact.

Global Climate Change

One commenter stressed the importance of analyzing the potential impacts this project could have on global warming. The commenter provided a list of potential impacts associated with global warming. They also expressed the need for the BLM to assess the social cost of carbon associated with this project. They emphasized the potential social impacts associated with global warming and postulated that the economic benefits of this project may not compensate for the economic costs associated with global warming.

Invasive Species and Pests

One commenter expressed concerns with the potential spread of aquatic invasive species from potentially contaminated equipment associated with this project. They provide guidance to address this potential impact. Another commenter expressed concerns with the potential introduction and spread of invasive plant species, such as halogeton, in association with this project. The introduction of such species could have a long-term impact in the project area, as these species often alter soil characteristics making establishment of desirable vegetation challenging.

Paleontological Resources

One commenter pointed out that multiple paleontological surveys will be conducted in association with this project, thereby providing adequate protection to this resource. Another commenter emphasized that a paleontological survey must be completed for each surface disturbing activity in the project area, and that requiring operators to report fossil finds was not a sufficient protective measure for this area.

General Opposition of Proposal

One commenter made a general statement of opposition to the project. No specific rationale or suggested alternatives were included in the statement.

General Support of Proposal

One commenter made a general statement of support for this project. They cite their support for multiple use of the land as well as the continued need for viable mineral production in their rationale.

Level of Controversy

One commenter provided a detailed description of the historic controversy associated with oil and gas development in the Adobe Town area. They include a statement that “this area has been counted by many as a sacred place where a drilling rig should never be seen.” Overall the commenter states that the level of controversy associated with oil and gas development in the area must be considered and analyzed by the BLM. The commenter expresses that this level of controversy would require the preparation of an EIS to adequately analyze potential impacts associated with this project.

Recreational Resources

One commenter was concerned that the disturbance associated with this project would have a significant impact on the recreational values of the area.

4.0 ISSUES IDENTIFIED DURING SCOPING

Based on the comments submitted during scoping and summarized in Section 3.2, the BLM developed 21 issue statements. These statements are generally presented in the form of a question and describe the general issues and concerns identified during scoping. This section also includes specific questions and concerns encapsulated within each issue statement, displayed in bullet-point format beneath each issue statement. Issue statements are organized by comment category and each comment category may have none, one or multiple issue statements based on the broad concerns raised by commenters. Comment categories are presented in the order given in Table 3. The BLM will continue to consider issues during the development of the NEPA document as it receives additional input from the public, cooperating agencies, tribes, and other affected parties.

Wilderness Values

Issue 1: How would this project impact the Adobe Town WSA?

- The project would be located outside of the established Adobe Town WSA boundary.
- The project would be located within Area A of the Adobe Town Citizens’ Proposed Wilderness Area.
- Would the project be visible from the Adobe Town WSA?
- How would potential impacts to the WSA be adequately mitigated?

Issue 2: Would this project impact lands with wilderness qualities?

- Would this project alter the outcome of the Lands with Wilderness Characteristics inventory for this area?

Policies, Regulations and Permitting

Issue 3: How would BLM meet its multiple-use mission in relation to this proposal?

- How would approval of this proposal affect other resource values?
- How would denial of this proposal comply with BLM’s multiple-use mission?

Issue 4: What form of NEPA analysis is appropriate for this proposal?

- Should an EIS be prepared to adequately analyze impacts associated with this proposal, or would an EA provide adequate analysis?
- How will BLM adequately analyze the potential impacts associated with the undisclosed well pad locations?

Issue 5: What role do valid and existing lease rights play in relation to this proposal?

- How do valid and existing lease rights affect BLM's decision space in relation to this project?
- The validity of existing leases should be examined as part of the NEPA analysis.

Visual Resources

Issue 6: How will the proposed project meet the visual resource requirements of the project area?

- The proposed project is located within a Class II Visual Resource Management (VRM) area. This VRM Class requires that disturbances not attract the attention of the casual observer. How would the project meet the VRM Class II standards?
- The proposed project is located in close proximity to the Adobe Town WSA. Would the project be visible from the Adobe Town WSA?
- Is it possible to adequately reduce impacts to visual resources associated with this project within and around the project area?

Mitigation

No issue statements were identified for this section.

Wildlife Resources

Issue 7: Would existing protection measures for wildlife, such as seasonal timing limitations, provide adequate protection to potentially impacted wildlife species?

Socioeconomics

Issue 8: How would the proposed project affect national, state, and local economies?

Land Designations

Issue 9: How would the proposed project affect current and future management of the Monument Valley Management Area (MVMA)?

- The entire proposed project is located within the MVMA.
- How would the proposed project comply with the management requirements of the MVMA?
- Would approval of this project limit BLM's ability to adequately consider designating the MVMA as an Area of Critical Environmental Concern (ACEC) in the forthcoming RMP?

Cultural and Historical Resources

Issue 10: Would the use of existing protection measures (such as cultural resource inventories, and the use of avoidance tactics) adequately protect cultural resources in and around the project area?

Water Resources

Issue 11: What practices would be utilized to protect surface and groundwater resources from potential degradation or contamination?

Oil and Gas Operations

Issue 12: What are the potential environmental impacts associated with hydraulic fracturing in relation to this proposal?

Issue 13: What existing standards and industry practices would be utilized with the proposed project to help minimize impacts to environmental resources?

Sage-grouse

Issue 14: Are there any potential impacts to sage-grouse associated with the proposed project?

- The proposed project is not located within designated sage-grouse core habitat.
- There are sage-grouse leks in the general area of the proposed project.
- What protective measures would be implemented to protect sage-grouse habitat?

Size and Scale

Issue 15: The proposed project is relatively small in scale.

- Full development would only proceed in the area if the initial wells prove to be economically feasible.

Reclamation

Issue 16: What efforts would be made to ensure that reclamation is successful?

- Low annual precipitation can make reclamation in this area challenging and time consuming.
- The common establishment of invasive species (such as Halogeton) following disturbance activities creates an additional challenge associated with reclamation in this area.
- Reclamation efforts should be coordinated with federal, state and local governments, as well as subject matter experts at the state university.

Global Climate Change

Issue 17: To what extent would the proposed project contribute to global climate change?

- What is the social cost of carbon associated with this project?

Invasive Species and Pests

Issue 18: How would the proposed project affect the establishment and spread of invasive species?

- What methods would be employed to minimize the potential spread of invasive species (both invasive plants and aquatic invasive species)?

Paleontological Resources

Issue 19: How would potential impacts to paleontological resources be addressed?

- Paleontological surveys should be conducted for each surface disturbing activity.

General Opposition of Proposal

No issue statements were identified for this section.

General Support of Proposal

No issue statements were identified for this section.

Level of Controversy

Issue 20: Consider and address the high level of controversy associated with development in the project area.

Recreational Resources

Issue 21: How would the proposed project impact recreational values within and near the project area?

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. An EA will be prepared to analyze the potential impacts to the human environment associated with the Proposed Action and alternatives. Upon completion of the EA the BLM will prepare a Decision Record specifying BLM's chosen course of action for this project.

APPENDIX A

SCOPING COMMENTS

Commenters listed by Document Number

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

Table A-1. Commenters Listed by Document Number

Document Number	Last Name	First Name	Agency or Organization Name
DR – 01	Akers	Alanna	NA
DR – 02	Bunning	Chris	John Bunning Transfer Co, Inc.
DR – 03	Culver	Nada	The Wilderness Society
DR – 04	Greene	Rick	Greenes Energy
DR – 05	Hanks	Dave	Rock Springs Chamber of Commerce
DR – 06	Hay	John	Rock Springs Grazing Association
DR – 07	Hays	Kate	NA
DR – 08	Johnson	Wally	Sweetwater County, Wyoming
DR – 09	Katherman	Maria	NA
DR – 10	Kennedy	John	Wyoming Game and Fish Department
DR – 11	La Point	Peggy	NA
DR – 12	Molvar	Erik	Wild Earth Guardians
DR – 13	Shepherd	Raymond	NA
DR – 14	Smith	Mike	QEP Energy Company
DR – 15	Stewart	Chad	NA
DR – 16	Stoltenberg	John & Martha	NA
DR – 17	Stuble	Julia	Wyoming Outdoor Council
DR – 18	Wagner	Esther	Petroleum Association of Wyoming
DR - 19	Watkins	Gary	NA

Scoping Comments by Comment Category

Table A-2 includes the comment document number and each comment made during scoping, reproduced as they were received by the BLM and organized by comment category. All comment excerpts in this appendix were either copied from an electronic source document, or typed into the table. Some minor errors may have occurred in the process of typing or copying these excerpts. To identify the name of the person and/or organization who submitted a comment, locate the corresponding document number in Table A-1.

Table A-2. Scoping Comments by Comment Category

Comment Document Number	Comment
<i>Cultural and Historical Resources</i>	
DR – 04	Among the many mitigations... are the following: · Multiple cultural... surveys to be carried out;
DR – 04	Among the many mitigations... are the following: · Roads and pipelines routed in such a manner as to avoid sensitive cultural areas;
DR – 07	[M]ultiple cultural surveys have been or will be conducted within the project area to catalogue and map any potentially sensitive areas, and to apply strict measures to protect them.
DR – 12	[A]nd also could have significant impacts on historical properties (particularly archaeological sites that stand to be impaired, either directly or due to impacts to their historic settings).
DR – 12	[W]e will expect the BLM to also require similar site surveys for archaeological resources as part of fulfilling their NHPA Section 106 requirements.
DR – 13	I am also pleased to see that in the initial proposal for the 11-34V well, roads were planned with sensitive environmental and cultural areas in mind...
<i>General Opposition of Proposal</i>	
DR – 16	We are opposed to allowing the rapacious oil companies to plunder federal lands.
<i>General Support of Proposal</i>	
DR – 06	RSGA supports the Desolation Road development proposed by Samson Resources. RSGA has worked with BLM and Samson to permit and build the infrastructure of access roads for previous wells in the immediate area including Questar EP – Spike No. 1 well. Public Opinion has been mixed regarding these proposals but RSGA supports multiple use and continued need to test for viable mineral production in the Haystack Rim and other areas.
<i>Global Climate Change</i>	
DR – 12	The high costs to society from the leasing and possible subsequent burning of public lands fossil fuels must be properly analyzed and presented to the public and agency decision makers... Proper consideration of these social costs of carbon is simply good governance and good stewardship of public resources, and such consideration is legally required. Global warming is responsible for extreme costs to society already, and it will only get worse in the future... The burning of coal, oil, and gas are the principle sources of the largest contributor to global warming, carbon dioxide... At this time, approximately 25% of the carbon dioxide from fossil fuels produced in the U.S. comes from public land leases... BLM decision makers play a critical role in determining how much more climate pollution the U.S. will emit to the atmosphere, the extent that that pollution will exacerbate global warming, and the extent that society will have to bear the myriad related social costs of those decisions... Global warming is exacting costs on society in numerous ways. Agricultural productivity, including crops, livestock, and fisheries have been negatively impacted by global warming... Both water quality and water quantity are being affected by global warming... Heat-related deaths and illnesses have grown and are growing... Impacts to forest resources from increased forest fires and the resulting impacts to air quality put additional costs on society... A wide variety of ecosystem services are degraded by global warming, including habitat for fish and wildlife, drinking water storage, soils, and costal barriers... Carbon dioxide pollution is also responsible for increasing ocean acidification. This list represents only a subset of the social costs of carbon pollution from burning fossil fuels extracted from our public lands.
DR – 12	BLM must draw the necessary connection between this project and increased climate impacts and costs. BLM must assess the impacts of climate change. In addition, the project must take a hard look through a thorough economic analysis. The costs to society of releasing hundreds

Comment Document Number	Comment
	of thousands of metric tons of carbon-dioxide equivalent is often completely ignored or presumed to be zero. In fact, application of the Social Cost of Carbon Protocol could arrive at project costs to society of tens of millions of dollars. The economic benefits of this project may well pale in comparison to its costs. This is exactly the type of misleading NEPA economic analysis that courts have rejected previously and recently. The EA must analyze the social cost of carbon.
<i>Invasive Species & Pests</i>	
DR – 10	Preventing the spread of aquatic invasive species (AIS) is a priority for the State of Wyoming, and in many cases, the intentional or unintentional spread of organisms from one body of water to another would be considered a violation of State statute and Wyoming Game and Fish Commission Regulation. To prevent the spread of AIS, the following is required: If equipment has been used in a high risk infested water [a water known to contain Dreissenid mussels* (zebra/quagga mussels)], the equipment must be inspected by an authorized aquatic invasive species inspector recognized by the state of Wyoming prior to its use in any Wyoming water. Any equipment entering the State by land from March through November (regardless of where it was last used), must be inspected by an authorized aquatic invasive species inspector prior to its use in any Wyoming waters. If aquatic invasive species are found, the equipment will need to be decontaminated by an authorized invasive species inspector. Any time equipment is moved from one 4th level (8-digit) Hydrological Unit Code watershed to another within Wyoming, the following guidelines are recommended: DRAIN: Drain all water from watercraft, gear, equipment, and tanks. Leave wet compartments open to dry. CLEAN: Clean all plants, mud, and debris from vehicle, tanks, watercraft, and equipment. DRY: Dry everything thoroughly. In Wyoming, we recommend draining for 5 days in Summer (June – August); 18 days in Springs (March – May) and Fall (September – November); or 3 days in Winter (December – February) when temperatures are at or below freezing.
DR – 12	[S]urface disturbance introduces noxious weeds such as halogeton, which renders impacts long-term by concentrating soil salts in its leaves and then dropping them on the soil surface...
<i>Land Designations</i>	
DR – 03	The area proposed for drilling and road construction lies entirely within the Monument Valley Management Area, designated under the Green River RMP as a candidate for Area of Critical Environmental Concern status.
DR – 03	[T]he Rock Springs RMP revision can and should consider substantial protections for this area. BLM should ensure that it has the flexibility to provide meaningful management for the MVMA and not foreclose protective management alternatives in permitting this project.
DR – 03	Recommendations: BLM must comply with the Green River RMP and require significant mitigation measures for the Monument Valley Management Area that protect the identified scenic, wildlife, cultural and recreation values.
DR – 12	The Area Proposed for Drilling is Within the Adobe Town Very Rare or Uncommon Area... While this designation restricts only non-coal surface mining... the designation does identify characteristics of the project area, inside "Area A" of the Very Rare or Uncommon designation, which are Very Rare or Uncommon in the state and therefore merit special protection. These include historical, geological, wildlife, and scenic values, and indicated that this area is "beyond rare or uncommon." ... BLM's approval of actions that would degrade the qualities designated by the State as Very Rare or Uncommon constitute a significant impact on the human environment...
DR – 12	The area proposed for drilling and road construction lies entirely within the Monument Valley Management Area, designated under the Green River Resource Management Plan (RMP) as a candidate for Area for Critical Environmental Concern status.

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DR – 17	<p>The two proposed natural gas wells on two well pads detailed in the project’s scoping notice would be located within the Monument Valley Management Area... the BLM has identified this area as one that should be afforded a great deal of protection from development activities... While Monument Valley is open to “consideration” for mineral leasing, exploration, and development, this can only be allowed when mitigation “can be applied to retain the resource values.”... (emphasis added). It will be extremely difficult to adequately mitigate the proposed 17 wells, 5 well pads, 12 miles of new pipeline, and 5 miles of new access roads (totaling 117 acres of new disturbance). This project is unlikely to be developed while providing for the “protection” of the Monument Valley area and “retain[ing]” the remarkable resource values of the area. Under this high standard, BLM cannot just “reduce” the environmental impacts or “limit” them, rather it must keep these resources from being damaged (the definition of “protect”) and it must keep or hold them in a particular condition (the definition of “retain”). Under the RMP’s management direction, BLM only needs to allow for “consideration” of minerals development. BLM is under no direction to approve development. It is unlikely the BLM can allow this development – and certainly not without significant mitigation – if it is to meet its own RMP standards.</p>
DR - 19	<p>In the final Adobe Town-Ferris Mountain Wilderness EIS, done as part of the MVMA – Green River RMP, it states that the “area is open to consideration for mineral leasing, exploration and development provided mitigation can be applied to retain resource values.” The extensive surveys and mitigation details provided for in the initial well proposal, and which will be carried out here, are more than sufficient to meet this requirement. Therefore it is clear that the proposal is within the management guidelines for the MVMA.</p>
Level of Controversy	
DR – 12	<p>There has long been broad public opposition to drilling in Adobe Town, and support for protecting it. The Rawlins BLM received over 80,000 public comments explicitly asking the BLM to withdraw the Adobe Town citizens’ proposed wilderness (which includes this proposed project area) from future oil and gas development. Numerous Wyoming newspapers have editorialized on the need to protect Adobe Town from drilling. These sentiments have been echoed by paleontologists, photographers, sportsmen, the Wyoming Association of Churches, backcountry horsemen, and Governor Freudenthal. The Wyoming AFL-CIO union representing almost 20,000 of blue-collar and sportsman members has petitioned the BLM to cease future oil and gas leasing in Adobe Town and require the best available mitigation measures to minimize impacts in developing existing leases. To say that drilling in Adobe Town is controversial is a gross understatement; this area has been counted by many as a sacred place where a drilling rig should never be seen. The tribe has spoken: The Wyoming public does not want to see bulldozers and drilling rigs in this area. In determining whether a project has a significant impact, one of the considerations is “The degree to which the effects on the quality of the human environment are likely to be highly controversial.” 40 CFR 1508.27(b)(4). In this case, the large number of individuals, including experts in various disciplines, who have written in opposition to drilling in Adobe Town constitutes a great deal of controversy regarding the level of impacts proposed for an area right in the middle of a very sensitive landscape. If the BLM asserts that the project will not have significant impacts on recreational users who use this area, and the users themselves assert there will indeed be significant impacts on their experiences, that’s controversy. And we would assert that the individual recreationists who use and value this area have a greater expertise than the BLM at assessing their own experiences. If for no other reason than this, BLM should undertake a full-scale EIS prior to approving these wells.</p>
Mitigation	
DR – 01	This project is an update to the previously announced Desolation Road Unit, which included

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	<p>numerous mitigations and practices aimed at limiting or eliminating environmental, cultural, and visual impacts. These mitigations are entirely appropriate for the current project... The cumulative effect of the practices and mitigations outlined in detail in the original proposal was to greatly minimize the impact the project had on the environment, and I am certain that their application in the current project will have the same positive effect.</p>
DR – 02	<p>The original well proposal from 2013, 11-34V, identified several areas of environmental or cultural concern and prescribed mitigation measures to address each of them. Those measures are entirely appropriate for this current proposal.</p>
DR – 03	<p>The Desolation Road Project should be designed to avoid, minimize, and effectively mitigate impacts, in compliance with departmental guidance. This necessarily includes committing to, and budgeting for, the full suite of mitigation efforts. These efforts must include all the steps in the mitigation hierarchy, including avoiding impacts wherever possible, minimizing unavoidable impacts through the use of best management practices on-site, and off-setting remaining impacts through off-site, compensatory mitigation. The project must include a mitigation program that fully addresses impacts to lands with wilderness characteristics, as well as other resources and values.</p>
DR – 03	<p>[W]e suggest BLM consider using its interim regional mitigation guidance in offsetting potential impacts to lands with wilderness characteristics from authorizing development in this area.</p>
DR – 04	<p>Among the many mitigations that were part of the 2013 Desolation Road design, and which one can safely assume will be applied to the current update, are the following: (The author then provides a list which is described by resource topic in his other comments).</p>
DR – 04	<p>Among the many mitigations... are the following: · Sensitive areas fenced off.</p>
DR – 08	<p>Since the proposed project is adjacent to the Adobe Town WSA, there are sensitive resource issues that should be addressed. Some of these issues involve wildlife, visual resources, grazing, and reclamation. To address these issues, Sweetwater County encourages Samson to work closely with the BLM and other interested parties to apply Best Management Practices (BMP) in a balanced manner that allows the project to proceed.</p>
DR – 08	<p>Sweetwater County is supportive of this project and recognizes that the proposed routes to the project may encounter resource issues. To minimize potential impacts, Sweetwater County strongly encourages Samson to utilize existing pipeline corridors, roadways and right of ways and to collaborate with agencies and local organizations with interest in affected resources.</p>
DR – 09	<p>Since we know that the horizontal drilling can reach up to 3 miles in any direction, I would suggest that these two proposed well sitings be MOVED NORTH nearer to the existing road instead of pushed up against the WSA boundary. This change would make less impact on the WSA and also shorten the proposed access roads. That is a reasonable compromise and probably the best that those of us who care about this special place can hope for.</p>
DR – 14	<p>[T]he project proponent has clearly shown a willingness to avoid, minimize and mitigate any impact to the surrounding Class II area, wildlife and other resources.</p>
DR – 15	<p>Furthermore, in accordance with measures committed to by the operator in the earlier Desolation Road Unit announcement in 2013, this current evolution of the project will protect the surrounding environment by designing roads and pipeline right of ways to go around sensitive ecological areas by fencing them off.</p>
DR – 17	<p>The Department of the Interior has released “A Strategy for Improving the Mitigation Policies and Practices of the Department of the Interior.”... We urge the BLM to ensure careful adherence to this new policy as it plans for the Desolation Road Unit project.</p>
DR – 17	<p>At a minimum, if the project is to be approved, we recommend the BLM consider the</p>

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	following: ...2. Limiting the footprint The BLM should also consider authorizing only limited surface disturbance across the project area. It could do this by regulating road construction, co-locating facilities and consolidating infrastructure.
DR - 19	[T]he proven mitigation measures initiated with the original Desolate Road well – including practices to protect wildlife habitat, avoid disturbance of critical areas, minimize visual impacts, and extensive plans for reclamation – will reduce the risk even further.
<i>Oil and Gas Operations</i>	
DR – 04	Among the many mitigations... are the following: · Detailed drainage, spill prevention, and reclamation plans put into place;
DR – 04	In addition to these specific mitigation practices, one expects the operating company to be dedicated to using industry standard best practices throughout the drilling and production phase, including the use of cement-bonded steel casing to protect groundwater and proper disposal of cuttings. These are ways of doing business that the industry has developed over decades to ensure that oil and natural gas exploration is done in the safest, most environmentally responsible manner possible.
DR – 12	The EA must also consider the impacts of hydraulically fracturing these oil and gas wells. This includes a discussion of water usage, wildlife impacts, seismic activity, health impacts, and any of the other known impacts of hydraulic fracturing... BLM must conduct a thorough analysis of hydraulic fracturing to comply with its NEPA responsibilities. The reference to this practice does not fulfill the agency's duties to take a hard look at the impacts of its action. The analysis of hydraulic fracturing will require an Environmental Impact Statement due to its significant environmental impacts that have heretofore never been analyzed in the programmatic EISs underlying oil and gas development in these two Field Offices.
DR – 15	The project is exploratory in nature and will ultimately only consist of 17 wells on 5 pads, along with a few miles of access roads and gathering pipelines. Following the initial 2 pads, the remainder will not be drilled until the economic viability of the first wells is established. This will ensure that no drilling is being conducted needlessly.
<i>Paleontological Resources</i>	
DR – 04	Among the many mitigations... are the following: · Multiple... paleontological surveys to be carried out;
DR – 12	[F]or the MVMA, "A paleontological survey is required prior to surface disturbing activities." Green River RMP. BLM must therefore require each road and/or wellpad to be fully surveyed by a trained and credentialed paleontologist prior to the onset of surface disturbing activities. It is not sufficient to allow operators to report fossil finds when they are noticed to trigger onsite surveys...
<i>Policies, Regulations and Permitting</i>	
DR – 01	It is part of the BLM's mandate to encourage and support the development of mineral resources on public land while ensuring that other resources are protected. This proposed action can meet that dual requirement very nicely by designing the project to specifically protect environmental, cultural, and visual values of the surrounding land, while still allowing access to natural gas resources.
DR – 03	Given the wealth of resources in this area and the age of the governing Green River RMP (including its environmental analysis), BLM should therefore complete an Environmental Impact Statement for this project or defer the project until the Rock Springs RMP is complete in order to adequately consider those other resources and design appropriate conditions of approval and best management practices for development. BLM can and should base its approach to this project on its substantial authority and discretion for managing development on existing leases.

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DR – 03	If BLM proceeds with the Desolation Road Project before the Rock Springs RMP revision is complete, then an EIS is required to ensure that the appropriate level of baseline data is gathered and environmental analysis is completed.
DR – 03	BLM must also ensure that proceeding with the Desolation Road Project at this time does not preclude meaningful consideration of alternatives in development of the RMP. We have identified lands with wilderness characteristics, and other natural values, in the project area for which BLM should be considering management alternatives that include protecting those resources. Authorizing new development in the area could foreclose BLM's ability to appropriately manage wilderness, recreation and scenic values. Authorizing development in citizens-identified lands with wilderness characteristics would therefore undermine the ongoing RMP revision by foreclosing management alternatives that might otherwise protect the wilderness and wildlife values of the area in violation of the National Environmental Policy Act...
DR – 03	BLM must evaluate site-specific impacts for every proposed well pad location in its environmental analysis... BLM cannot conduct adequate environmental analysis for the other three well pads without knowing precisely where they will be located. BLM must either identify those locations at this time and analyze associated impacts or conduct additional NEPA analysis when the proposed locations for those well pads are known.
DR – 03	Recommendations: BLM must ensure the project is informed by updated resource information and environmental analysis in compliance with FLPMA, and therefore must conduct an EIS or postpone the project until the Rock Springs RMP revision is complete. The project should not be sited in potential lands with wilderness characteristics to avoid foreclosing meaningful consideration of management alternatives in the RMP in violation of NEPA. BLM must conduct site-specific NEPA analysis for every individual well pad.
DR – 12	The BLM will therefore need to undertake a full-scale Environmental Impact Statement for this project, and this NEPA analysis should also include analysis of all connected actions, including but not limited to the Desolation Road Unit. The validity of underlying leases must be considered.
DR – 12	BLM has the duty to consider designating the project area as an Area of Critical Environmental Concern in the revised Rock Springs RMP, which is currently open in a planning process... The BLM also has an affirmative duty to consider managing Lands with Wilderness Characteristics that may be identified in the project area to protect wilderness qualities through the new RMP. Approval of the proposed project potentially undermines BLM's ability to select protective alternatives for these lands under the Rock Springs RMP revision.
DR – 12	We recognize that under the Mineral Leasing Act, the project proponents have the privilege to explore and develop at least somewhere on valid leasehold(s), subject to BLM-administered Conditions of Approval that can be applied to protect resources such as wilderness qualities, visual resources, and archeological and paleontological resources. It is important to note that the Mineral Leasing Act does not confer the right to build an access road to the leasehold. However, there is no possibility that this project can be approved according to standard industry practices without triggering a full-scale EIS. We petition BLM pursuant to 5 USC § 555(e) to undertake such an EIS, and ultimately deny the proposed drilling.
DR – 14	[G]iven this is an area open for mineral leasing, exploration and development, it is entirely appropriate that a FONSI be granted on the project as proposed and that development move forward.
DR – 14	Please support your multiple-use mission by issuing a FONSI for this project on an alternative that is practical, affordable and consistent with the project proposed and the lease rights the proponent holds.

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DR – 15	I recognize the difficult balancing act that the BLM must engage in to ensure that the sometimes competing objectives of maintaining or enhancing opportunities for exploration and development of mineral resources, while protecting other resources. However, I firmly believe that the Desolation Road Natural Gas Project provides a fantastic opportunity to accomplish both objectives easily.
DR – 17	Although the Desolation Road project could ultimately consist of up to 17 natural gas wells drilled from 5 well pads – all of which would be located within two miles of the Adobe Town Wilderness Study Area (WSA) and one pad 1000 feet from the WSA boundary – the scoping notice only provides detail for two vertical exploratory wells from two pads. There are advantages to analyzing the project in its entirety, however, should the BLM opt to only consider the two exploratory wells, we urge the agency to approach the analysis and any subsequent authorization conservatively.
DR – 18	Public lands managed by the BLM must be utilized for multiple uses, including energy development.
DR – 18	In the Project, BLM must consider the Operator’s objectives of developing and maximizing recovery of hydrocarbon resources underlying federal mineral leases within the Project Area when identifying the purpose and need of the project.
DR – 18	[W]e recommend that BLM analyze only those alternatives that meet the Operator’s purpose and need for the Project. It would be inappropriate for BLM to analyze alternatives that are inconsistent with the objective of developing hydrocarbon resources within the Project Area.
DR – 18	We remind BLM that when developing alternatives in the Project EA, the agency is only required to analyze reasonable alternatives. Alternatives that would render development within the Project Area uneconomical or infeasible are not reasonable. Also, BLM must not analyze alternatives with restrictions or conditions of approval that would render development uneconomical, recognizing that certain technologies may not be feasible throughout the Project Area. Additionally, BLM must avoid analyzing alternatives that are inconsistent with valid 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.
DR – 18	We further remind BLM that it may not analyze an alternative that would result in denial of the project as a “no action” alternative. Under a “no action” alternative, BLM may only analyze continuation of the status quo.
DR – 18	If Samson recommits to the design features identified... it will provide sufficient mitigation to sufficiently reduce or eliminate adverse effects warranting the determination of a FONSI. We remind BLM that any alternative that is unworkable, too costly or inconsistent with granted lease rights must be eliminated from further consideration.
DR - 19	This project fulfills the BLM’s mandate to develop our nation’s natural resources in a way that is compatible with environmental stewardship.
Reclamation	
DR – 07	[T]he original proposal included detailed reclamation plans for after initial construction and production operations were completed, as well as measures to ensure erosion is controlled by utilizing straw mats, and to fence off sensitive areas.
DR – 08	Proper concurrent and final reclamation is vitally important to Sweetwater County to maintain the resource base for wildlife, ranching, recreation, air quality and other multiple use issues. Sweetwater County encourages Samson Resources to coordinate its reclamation and monitoring plan with the BLM, Wyoming Game and Fish Department, the University of Wyoming and the Sweetwater County Conservation District.
DR – 12	Due to the sparse annual rainfall in this area (only 5 inches annually), we are concerned that

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	any surface disturbing activity will take decades if not centuries to heal. Reclamation is often unsuccessful in this area, and surface disturbance introduces noxious weeds such as halogeton, which renders impacts long-term by concentrating soil salts in its leaves and then dropping them on the soil surface, rendering seedling establishment difficult if not impossible for native vegetation. Furthermore, the lack of watering requirements for revegetation renders it unlikely that native seed mixes planted as part of reclamation procedures will survive to reach maturity, further impairing the ability of disturbed sites to heal. Finally, sagebrush, the dominant native cover type, establishes very poorly in the absence of additional water (ordinarily provided by the snowdrifts on the lee side of adult plants, which are absent on reclaimed sites. With this in mind, it may take 75 to 125 years for native Wyoming big sagebrush cover type to recover, a significant environmental impact.
Recreational Resources	
DR – 12	We have grave concerns that these wells and the roads and ultimately pipelines associated with them will have a significant impact on the human environment, particularly on... recreation...
Sage-grouse	
DR – 07	Naturally, the greater sage-grouse habitat is an ongoing concern. However, no aspects of this project have been identified as taking place within core sage-grouse habitat. Furthermore, no greater sage-grouse leks have been identified and recorded within the project area.
DR – 10	The project area is not located within a greater sage-grouse core population area. An active greater sage-grouse lek is located adjacent to the proposed access road in Section 22, T.16N., R.95W. A typographical error in the scoping notice incorrectly states that this lek is located in R.96W. Non-core area stipulations, including a 0.25 mile NSO stipulation and a 2-mile seasonal stipulation should be analyzed within an alternative.
DR – 13	[T]he project will have little if any impact on the greater sage-grouse, a species of great concern to us all, since neither core sage-grouse habitat, nor leks have been identified within the project area.
DR – 15	[T]he project area has not been identified to fall within any Greater Sage Grouse core habitat or leks.
Size and Scale	
DR – 01	[T]he overall scope of the project is very small.
DR – 04	The facts are clear that this project will leave a very small footprint on the environment of the region.
DR – 13	This is a relatively small project... Most of these will only be drilled after initial wells demonstrate viability and economic recovery of the gas, lessening the risk of “dry” wells and unnecessary disturbance.
DR – 14	This is a very limited project at this time, and it fits the BLM’s mandate for this area, which is to “maintain or enhance opportunities for exploration and development while protecting other resource values.”
Socioeconomics	
DR – 02	This project... will have a positive impact on the local economy and on domestic energy supply, while having a very small impact on the environment.
DR – 04	The benefits of this project – providing local jobs, continuing to support the local economy, and producing inexpensive domestic energy – far outweigh any risks to the environment.
DR – 05	The natural gas industry is very important to the economy of southwest Wyoming. There has been a slowdown in that industry recently. Developing new projects is important to our current and future economic health. The proposed activity will hopefully lead to future development to sustain our economy. We urge the BLM to approve of the proposed activity.

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DR – 08	Oil and gas development provides 43 percent of the Sweetwater County assessed valuation, which translates into a 2014 assessed value of \$1,228,515,783. The oil and gas industry, along with this valuation, provide employment, a high standard of living and high quality public services for the people of Sweetwater County. The continuation of these benefits are dependent upon the development of oil and gas projects like the Desolation Road Unit. Therefore, Sweetwater County is strongly supportive of Samson Resources and their proposed project.
DR – 18	As oil and gas produced from traditional supply sources decline, the untapped 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. The Project exemplifies the responsible development of the federal lands to increase domestic energy sources.
DR – 18	Oil and gas production on the public lands also provides important revenue to state, local, and regional economies. In fact, development of one well can yield hundreds of thousands of dollars that are paid to governments and reinvested in the local community. Production of these resources provides important revenue to county, state, and federal governments through royalties and taxes. Furthermore, development requires increased employment and results in substantial economic investments in the local economies. This project will contribute to both the state employment in southwest Wyoming and the revenue for the national, state, and local economies.
DR – 19	Just as important is the overall economic benefit of the project. While this particular project is rather small – only 17 wells on 5 pads – it is part of a very important industry and job driver for our region.
DR – 19	[E]very well that we drill here is additional energy produced domestically, which contributes to our nation’s shared goal of energy security.
Visual Resources	
DR – 02	Among those previously identified measures are the use of low profile tanks and site specific background coloring of permanent surface equipment. This will reduce any visual impacts that the project might create.
DR – 03	The Desolation Road Project could impair... visual... resources, and therefore substantial mitigation measures are required.
DR – 03	Casual observers atop the Haystacks or along the old Manuel Gap Road would be in full view of the proposed roads and wellsite facilities, which would be difficult to hide from view. Therefore, mitigation measures must be required to reduce impacts to visual resources in the MVMA.
DR – 04	Among the many mitigations... are the following: · Low profile tanks used on location and all surface equipment painted to specifically match the individual locations background;
DR – 07	Previously identified measures outlined for the original 11-34V well are appropriate for the new proposal, and will reduce visual impact (e.g. low profile tanks and background coloring specific to location).
DR – 08	The proposed Desolation Road Unit is classified as a VRM Class II. While Sweetwater County is supportive of BMPs that help blend the proposed development into the adjacent Adobe Town WSA, Sweetwater County does not support the VRM Class II designation.
DR – 12	We have grave concerns that these wells and the roads and ultimately pipelines associated with them will have a significant impact on the human environment, particularly on... visual resources...
DR – 12	These wells are likely to have a significant impact on the scenic qualities of this area... by introducing the industrial intrusions of roads and wellpads in an area that is essentially undeveloped at present.

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DR – 12	In this case, the project as proposed is likely to impair... visual... resources, and therefore could only go forward with extreme modifications (e.g., heliportable drilling, oak mats in lieu of surface disturbance for road or wellpads).
DR – 12	Casual observers atop the Haystacks or along the old Manuel Gap Road would be in full view of the proposed roads and wellsite facilities, which would be difficult to hide from view. In order to fulfill the intent of this direction, the following mitigation measures need to be required: - Heliportable drilling and the use of oak or composite mats in lieu of bladed and constructed wellpads. Bladed and constructed wellpads would be visually apparent (even obvious) to the casual viewer... -The use of helicopter access or existing jeep trails for wellsite access. Constructed gravel roads would be visually apparent (even obvious) to the casual viewer... - Wellheads and all wellsite equipment must be countersunk below grade level. Aboveground equipment would be visually obvious to the casual observer... -Abandoned well markers should be applied at grade-level, with no pipes protruding aboveground to be noticed by the casual observer. -Pipelines should be placed on the surface and camouflaged rather than buried in order to minimize surface disturbance, and rights-of-way should not under any circumstances be bladed to prevent long-term and visually obvious disturbance to the vegetation and soils. Each of these recommendations has been implemented elsewhere and therefore constitutes a reasonable (and indeed, necessary) alternative for industrial development in such a sensitive landscape. Failure to require these measures will move the project into the realm of “significant environmental impacts” with regard to visual resources in the MVMA, requiring and EIS. We expect the BLM to consider all of these recommendations in detail in its forthcoming NEPA.
DR – 12	In this case, the entire proposed project area is a highly scenic area, an area in which construction of wellsites should be avoided.
DR – 13	[S]everal measures listed in the initial 2013 proposal to deal with any visual impacts that may occur and to prevent any degradation of other resources in the area, will be equally effective and appropriate for this update.
DR – 13	[M]any efforts were directed at minimizing the visual impact of the project, including the use of low profile tanks.
DR – 15	Other measures carried over from the original proposal include lessening visual impacts by using low profile tanks and flare stacks and painting surface equipment with site specific background colors.
DR – 17	At a minimum, if the project is to be approved, we recommend the BLM consider the following: ... 4. Phased development Meeting the standards for VRM Class II areas will be difficult in this project area. The proponent and BLM have sited one well pad so that it is topographically camouflaged, thus limiting the visual impacts on the wilderness study area. But the well pad located 1000 feet from the WSA boundary is not topographically blocked and even if landscape colored paint is used, it will impair the wilderness values of the study area and the VRM standards for the Monument Valley MA.
Water Resources	
DR – 02	The 11-34V proposal also outlined measures for protecting and conserving water, namely by using water from purposely-drilled water wells instead of from local rivers, and by providing for background testing to help monitor water quality throughout the duration of the project.
DR – 04	Among the many mitigations... are the following: · Background water samples taken to establish and monitor water quality;
DR – 04	[O]perating company... dedicated to using industry standard best practices... including the use of cement bonded steel casing to protect groundwater.
DR – 10	To minimize impacts to the aquatic resources of nearby waterways, we recommend the

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	following: · Accepted best management practices be implemented to ensure that all sediments and other pollutants are contained within the boundaries of the work area. Disturbed areas that are contributing sediment to surface waters as a result of project activities should be promptly re-vegetated to maintain water quality.
DR – 10	To minimize impacts to the aquatic resources of nearby waterways, we recommend the following: · Equipment should be serviced and fueled away from streams and riparian areas. Equipment staging areas should be at least 300 feet from riparian areas.
DR – 19	Also of great importance to many of us in the region is the fact that water for the project should be drawn from water wells drilled specifically for the purpose, again as provided for in the initial proposal, and not come from any of the regions streams, creeks, or rivers.
Wilderness Values	
DR – 03	We are especially concerned that the proposed project would have significant impacts on wilderness-quality lands and would foreclose the BLM’s ability to consider management alternatives for those lands and their resources in the Rock Springs RMP.
DR – 03	The proposed project is completely within Area A of the Adobe Town Citizens’ Proposed Wilderness Area, an area that has been identified by the conservation community as possessing wilderness characteristics... [T]he Rock Springs Field Office is updating its LWC inventory as part of the RMP revision, in compliance with agency policy. That inventory has not been made publicly available, and BLM has not accepted public comment on the inventory as part of a NEPA process. Therefore, current policy requires that BLM update its inventory as part of evaluating this project, analyze potential impacts to lands with wilderness characteristics, accept public comments on that inventory and analysis, and consider alternatives to protect those lands from project impacts.
DR – 03	First and foremost, BLM should strive to locate new development to avoid impacts to lands with wilderness characteristics. BLM should also minimize impacts to the Adobe Town Wilderness Study Area by siting well pads in locations that would not disrupt the wilderness experience in the WSA. The current proposal would site two well pads near the WSA, including one within 1,000 feet of the WSA boundary. This is inappropriate and unnecessary for exploratory drilling on a unit. BLM should minimize impacts to the WSA by siting well pads away from the WSA boundary, at least until the geologic information demonstrates that siting well pads near the WSA is necessary.
DR – 03	Our preference is avoiding damage to lands with wilderness characteristics, but where impacts cannot be avoided, BLM should require mitigation.
DR – 03	Recommendations: BLM must address lands with wilderness characteristics in its environmental analysis for the Desolation Road Project, including updating its LWC inventory, analyzing potential impacts to LWCs and accepting public comment on the inventory and analysis. BLM must evaluate alternatives that eliminate, minimize and/or mitigate impacts to lands with wilderness characteristics, including the Adobe Town WSA.
DR – 03	The Desolation Road Project could impair... wilderness resources, and therefore substantial mitigation measures are required.
DR – 04	It is not being conducted within the borders of any protected areas, such as the Adobe Town Wilderness Study Area, and if previous efforts are any indication, I am confident that the project managers will have done extensive work to ensure that the drilling of these 17 wells will have as little impact as possible.
DR – 07	[T]he project area does not intersect with the WSA’s boundaries, and all activities will occur outside the WSA.
DR – 09	It is with my usual sadness that I read of plans to further industrialize the area surrounding Adobe Town. The wilderness study area has been under assault since it was first proposed by

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	citizens more than 25 yrs ago. The newest plans have locating noisy, flaring, dust & traffic producing (frickin') fracking pads located at the border of the WSA. ... Now BLM is proposing such a pad less than a ¼ mile from the Adobe Town WSA. This is WAY too close and will change the experience for visitors & wildlife both... As more of these projects are proposed and OK'd we will lose the wilderness nature of the area and the WSA will no longer be so classified.
DR – 12	It is disconcerting that BLM appears to be moving ahead with a drilling project in an area the agency has determined to possess wilderness qualities in the past, in the absence of a sufficient inventory analysis consistent with the agency's wilderness inventory policy, and during the revision of the Rock Springs RMP, under which managing these lands to preserve their wilderness qualities should be an alternative under the LWC policy.
DR – 12	We have grave concerns that these wells and the roads and ultimately pipelines associated with them will have a significant impact on the human environment, particularly on wilderness qualities... and the undeveloped quality of the land.
DR – 12	The Area of Proposed Drilling is Within an Area Found by BLM to Have Wilderness Qualities, Rendering Significant Impacts Certain
DR – 12	BLM must follow measures in the current wilderness inventory handbook... to satisfy NEPA baseline information requirements regarding the presence of wilderness qualities in the project area and to be able to sufficiently assess the impacts of the project to these wilderness qualities. Roadless areas and other potential wilderness lands are known to be a significant resource and to possess significant recreation, wildlife, and scenic values.
DR – 12	We are hereby identifying wilderness characteristics as an issue with regard to the Desolation Road wells for the purposes of its NEPA process...
DR – 12	The Rock Springs Field Office has yet to complete and publish its Lands with Wilderness Characteristics inventories, and thus it would be premature to approve a project that impacts these resources. It is clear that oil and gas drilling and road, well, and pipeline related construction activities represent significant impacts on wilderness characteristics.
DR – 12	Clearly, because the drilling and construction activities entailed in the approval of the four NOSs proposed by Samson Resources entail long-term (essentially permanent) facilities and surface disturbance, they cannot meet BLM's standard for nonimpairment of wilderness character, and therefore constitute impairment of wilderness qualities which is a significant impact to the human environment under NEPA.
DR – 12	In this case, the project as proposed is likely to impair... wilderness resources, and therefore could only go forward with extreme modifications (e.g., heliportable drilling, oak mats in lieu of surface disturbance for road or wellpads).
DR – 12	The lands of the Adobe Town citizens' proposed wilderness are substantially undeveloped, and indeed they have been recognized as possessing wilderness qualities. There is strong legal precedent indicating that federal project impacting lands that are undeveloped in nature require an EIS... The approval of oil and gas drilling, facility construction, and construction of an improved gravel road within wilderness-quality lands constitutes a similar situation. Thus, in this case an EA could not legally proceed to a Decision Record, but instead a complete Environmental Impact Statement must be compiled prior to reaching a decision.
DR – 12	BLM's Inventory Area Evaluation has found that this area is roadless using the BLM's criteria for roads. There is precedent for drafting a full-scale EIS in a comparable roadless area... The Duck Creek Federal Environmental Impact Statement, Medicine Bow – Routt National Forest (Published 2002 and 2003) provides a template for the necessary level of analysis for drilling in a sensitive area with roadless and wilderness qualities similar to those found in the Adobe Town Citizens' Proposed Wilderness. On the strength of the roadless qualities that would be

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	impacted by drilling, an extensive EIS was prepared for the Duck Creek drilling. BLM should undertake a similar level of thoroughness and analysis for this project.
DR – 13	The project is entirely located outside of Adobe Town Wilderness Study Area...
DR – 14	QEP expects BLM will receive comments related to the Adobe Town Wilderness Study Area. However, most importantly, there is not a proposed well within the boundary of the WSA. Setting aside for the time being the long and inappropriate history we have in this country of treating WSA as de facto wilderness, in this instance the project proponent has avoided the WSA altogether. If these boundaries will ever mean anything, then activity clearly outside of the boundary must be allowed to proceed, especially when the proponent has agreed to take steps to limit and/or mitigate any impact.
DR – 15	All drilling and construction will take place outside of the Adobe Town Wilderness Study Area.
DR – 17	We ask the BLM to consider the remarkable values it is entrusted to protect in the Adobe Town WSA and its authority to condition, and if necessary, to deny, authorization of the current proposal until a plan is in place to adequately mitigate impacts.
DR – 17	All uses or facilities affecting a WSA “must meet the non-impairment standard (i.e. must be both temporary and not create surface disturbance),” unless the use is one of several enumerated exceptions to the non-impairment standard. BLM Manual 6330 at 1-10. We ask the BLM to take a close look at this non-impairment standard and to determine whether and how future management of the Desolation Road Unit – particularly as it implicates these two proposed well pads – will be consistent with the standards that apply to WSA management. Oil and gas facilities as close as 1000 feet to the WSA boundary could violate the non-impairment standard. The noise, visual intrusions, and smells of this industrial scale activity will negatively impact the untrammelled nature of the area, its primeval character, will make the imprint of humans substantially noticeable, thereby making the area to appear not primarily affected by the forces of nature. These facilities will reduce or eliminate opportunities for primitive and unconfined types of recreation. Trucks kicking up dust and creating loud noises, the sound of drill rigs in operation, the even louder noises from hydraulic fracturing operations, the overwhelming and nauseating smells of petroleum products and other hydrocarbons, and huge and unsightly industrial infrastructure such as drill rigs and natural gas wells that can be seen for miles around will destroy these wilderness values. BLM can and should consider denial of these proposed wells or in the alternative, effectively mitigate the impacts that would impair the wild values of the Adobe Town WSA.
DR – 17	We are concerned that this project will have severe impacts on the wilderness qualities of the Adobe Town WSA. We ask the BLM to determine whether the mitigation it will require will adequately protect these qualities. If not, the mitigation needs to be improved or the project denied until adequate mitigation is agreed upon.
DR – 17	In addition to adhering to the guidance in this mitigation policy, the BLM has heightened requirements because of the sensitivity of the landscape and the WSA in question. Before authorizing development BLM must ensure the non-impairment standard from its WSA Manual and the guidance from the Green River RMP are met.
DR – 17	At a minimum, if the project is to be approved, we recommend the BLM consider the following: ... 4. Phased development ... We understand that geologic constraints regarding exploration of the westward extent of the natural gas play may necessitate this well pad location. This is a situation where geo-physical necessities are at odds with appropriate and required mitigation measures designed to ensure non-impairment of wilderness values.
DR – 17	At a minimum, if the project is to be approved, we recommend the BLM consider the following: ... 4. Phased development ...Our interest – and that of numerous other desert wilderness enthusiasts – is to protect the wilderness characteristics in the Adobe Town WSA.

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	The BLM is charged with finding ways to facilitate multiple uses without impairing other resource values. We propose that phased development might present a solution. The topography suitably mitigates the impacts from the western-most proposed well pad to wilderness and visual resource values of the Adobe Town WSA. Possibly, the eastern-most proposed well pad, only 1000 feet from the WSA boundary, is unnecessary for this unit's development. If the westward well proves viable, the other 16 proposed wells on four more well pads could (after thorough analysis) be developed using appropriate siting and mitigation measures that remove the impacts to wilderness values. Together, given the exploratory nature of this project, its significant impacts to wilderness and other remarkable values, and the possibility mitigation will not be adequate, it is clear all caution from conservative, phased approach is needed.
DR – 19	This project does not overlap any designated Adobe Town WSA land. However, surveys will still be conducted to identify any areas that require extra protection or mitigation.
Wildlife Resources	
DR – 02	Wildlife concerns are also addressed in the proposal, by stipulating timing limitations which will protect several species.
DR – 04	Among the many mitigations... are the following: · Adherence to BLM Timing restrictions in place to protect local wildlife, in particular raptors, mountain plover, and pronghorn antelope;
DR – 07	Wildlife concerns are adequately addressed as well. First, strict timing restrictions have been put in place by the BLM to help ensure the protection of local pronghorn antelope, mountain plover, and various species of raptors during critical times.
DR – 10	[T]he proposed well-pad and most of the new access road and pipeline right-of-way are located within pronghorn antelope crucial winter range. We recommend that the well-drilling operations and construction of the well-pad, access road and associated pipeline be avoided between November 15th and April 30th.
DR – 10	[T]here are four raptor nests within one-mile of the project area, and... two of these nests are located within 0.25 miles of the proposed access road and pipeline. Protective measures, including nest buffers and timing stipulations, should be analyzed in an alternative. We recommend the following Disturbance free dates and buffer zones around these raptor nests, within which disruptive activities associated with construction of the road, well-pad and pipeline should be avoided: Species: Ferruginous Hawk Disturbance Free Dates: April 1 – July 31 Disturbance-Free Buffer: 1 mile Species: Golden Eagle Disturbance Free Dates: February 1 – July 31 Disturbance-Free Buffer: ½ mile Species: Prairie Falcon Disturbance Free Dates: March 1 – August 15 Disturbance-Free Buffer: ½ mile
DR – 11	I am strongly opposed to any pad sites being within one mile of the boundary of the Adobe Town WSA, to minimize the already devastating impact of drilling on the wildlife community in Wyoming.
DR – 12	We are also concerned about the potential impacts of the proposed drilling on wildlife. Antelope crucial winter range is located in or near the locations of proposed roads and wellsites. We are concerned that human activity both during the construction/drilling period and during the production period of wellfield operations could displace wintering pronghorn from preferred habitats onto more marginal lands, resulting in significant impacts in their body condition potentially imperiling their survival. Mountain plover nesting habitat and occurrences have been recorded in and near the area proposed for road upgrades and well construction. Due to the lack of specific well and road locations for the project, additional sensitive resources may see significant impacts; these include white-tailed prairie dog colonies, active raptor nests, key sage grouse habitats, and crucial mule deer ranges.

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DR – 13	BLM timing limitation on drilling, construction, and production activity will be in place to protect antelope, mountain plover and raptor habitat during critical times of the year.
DR – 17	At a minimum, if the project is to be approved, we recommend the BLM consider the following: 1. Timing Stipulations Protecting and retaining antelope crucial winter range, and potential raptor and mountain plover habitat in this area is difficult to achieve by relying on traditional timing stipulations alone. The stipulations only limit the direct impacts of the drilling phase of the project, i.e. truck traffic, drill rig noise, etc., on the big game species. But the indirect impacts of the development, through surface disturbance, still disrupt the habitat and food supply of big game and a suite of other species if, as is the case here, the surface disturbance is large-scale (e.g. 117 acres) and in an arid landscape. These stipulations should be applied to all surface disturbing activities associated with this project at all phases of construction – including well pad, pipeline, and road construction, monitoring, and maintenance.
DR – 17	At a minimum, if the project is to be approved, we recommend the BLM consider the following: ... 3. Habitat improvement and reclamation standards The BLM could also require as a condition of approval that pre-development ecological inventories are used to assure post-development ecological conditions are achieved in reclamation plans so that habitat values are retained and/or reestablished. Other habitat improvement projects specific to impacted wildlife species should be considered in addition to limiting the timing and extent of surface disturbances.