



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Rock Springs Field Office
280 Highway 191 North
Rock Springs, Wyoming 82901

1792/1310 (040)
Wolverine Project

May 21, 2001

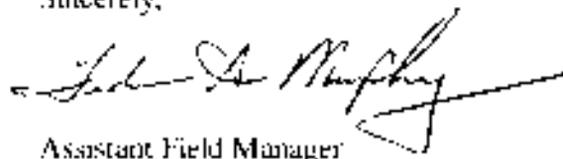
Dear Reader,

Enclosed you will find the Decision Record and Finding of No Significant Impact which describes the Bureau of Land Management's (BLM) decision for Wolverine's Exploratory Drilling proposal near the designated historic trail system.

The environmental assessment was released for a 30-day comment period. Based upon comments, BLM prepared an errata (see Appendix A) which further clarifies the text in the environmental assessment. BLM received 17 response letters. Appendix B provides a summary of comments received and BLM's response to the comments.

BLM appreciates the public's participation during preparation of the environmental analysis. Copies of this Decision are available at the Rock Springs Field Office in Rock Springs. You may call Teri Deakins, at 307-352-0211, to request copies. If you have questions about this action, please call me at 307-352-0321.

Sincerely,



Assistant Field Manager

**Decision Record and Finding of No Significant Impact
for
Wolverine Exploratory Drilling Proposal
in Close Proximity of the Historic Trail System**

Introduction

Wolverine applied to the Bureau of Land Management (BLM), Rock Springs Field Office (RSFO), for approval to drill 3 exploratory wells on their existing valid leases. These leases are near a designated National Historic Trail System and are located in Sublette County, roughly 19 miles northeast of Farson, Wyoming (Map 1).

Alternatives Considered

The *Environmental Assessment for Wolverine Exploratory Drilling Proposal in Close Proximity of the Designated Historic Trail System* (WY-040-01-027, EA) analyzed two alternatives. Under the Proposed Action, Wolverine proposed to drill 3 exploratory wells. The No Action Alternative analyzed the impacts of denial of Wolverine’s proposal. A directional drilling alternative was explored but dropped from further analysis since 2 of the 3 wells will be directionally drilled (see Appendix A for the errata to EA).

Decision

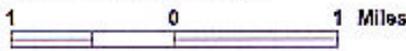
Based upon the analysis contained in the aforementioned EA, the BLM approves Wolverine’s Proposed Action. Wolverine may drill the following wells once Applications for Permits to Drill (APD) are approved:

Lease Number	Well Number	Location
WYW-147486	Pacific Creek A4-33	T.27N., R103W, Sec 33: SW1/4NE1/4,
WYW-141152	Pacific Creek A3-8	T.27N, R103W, Sec. 8: NW1/4NE1/4,
WYW-146499	Pacific Creek C4-25	T.27N, R104W, Sec. 25: NE1/4SE1/4

Access to the proposed locations will be from Highway 28 and existing BLM Road 4106. This decision will allow construction of approximately 1.8 miles of new access as shown on Map 1. Access roads will be constructed and maintained per plan of operations/development/Conditions of Approval. Drilling will be in accordance with the Plan of Operations (provides detail on drilling methods to be used, and are on file at the RSFO and are incorporated by reference) and Conditions of Approval attached to the approved APDs. Typical drilling methods and standard operating procedures will be employed with two exceptions. The surface location of the A4-33 and C4-25 wells were moved to screen the wells from view by those visiting the trail system and will be directionally drilled to reach the target zone. Drilling is expected to take approximately 90 days per well. Associated production equipment (i.e., condensate tanks, dehydrator units, separators, etc.) will be required if any of the wells produce commercial quantities of

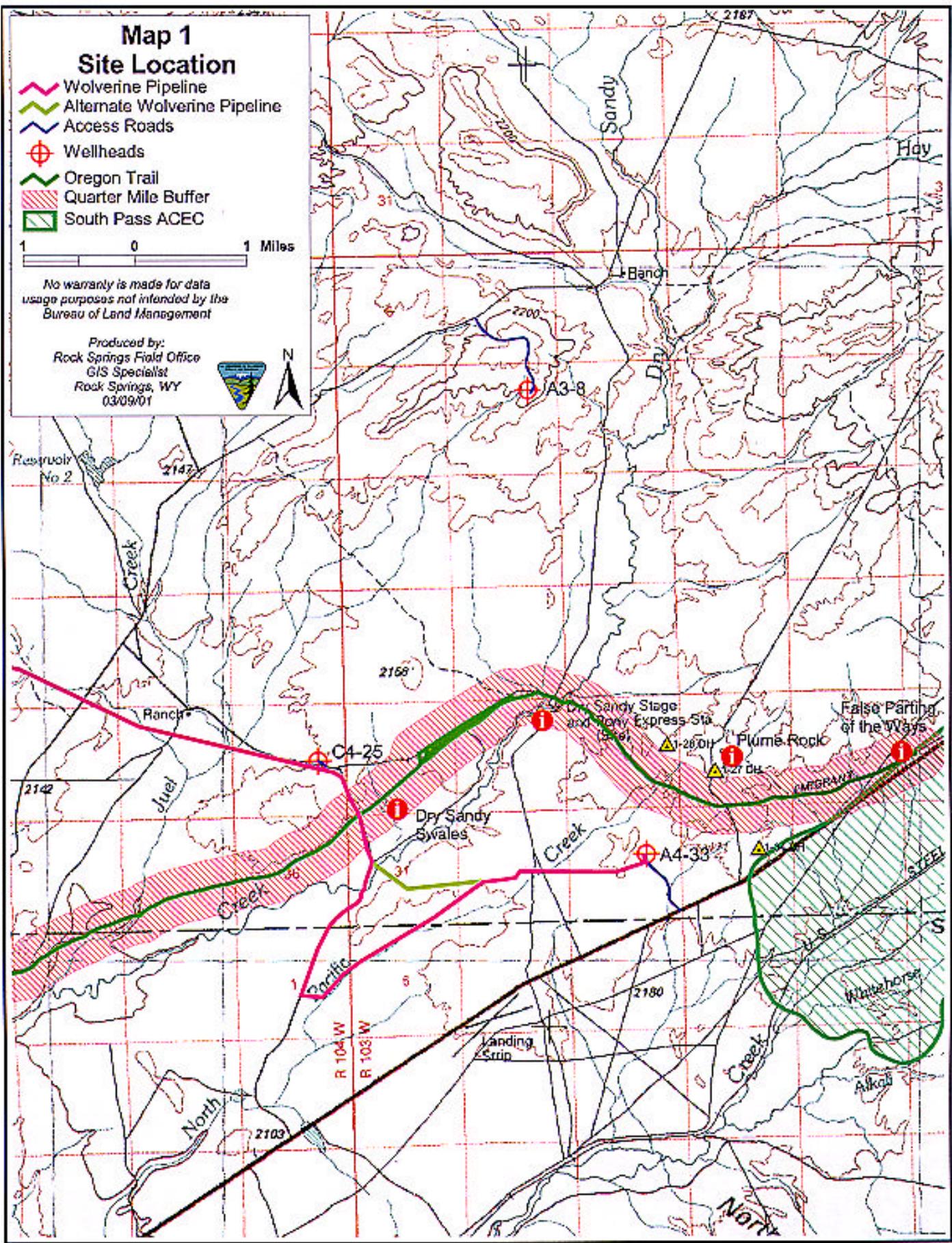
Map 1 Site Location

-  Wolverine Pipeline
-  Alternate Wolverine Pipeline
-  Access Roads
-  Wellheads
-  Oregon Trail
-  Quarter Mile Buffer
-  South Pass ACEC



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Rock Springs Field Office
GIS Specialist
Rock Springs, WY
03/09/01



hydrocarbons as well as gathering pipelines. Any necessary gathering pipelines will be placed within existing disturbance (i.e., placement in burrow ditches along existing or constructed roadways) or in such a manner as to be visually screened from view by visitors along the historic trail system. Wolverine has committed to the following measures:

- Based on field reviews and viewshed analysis, relocation of well sites (Map 1) to screen wells from view by any visitors using the historic trail system to the extent practicable while maintaining lease rights to explore for and produce any commercial quantities of hydrocarbons found.
- All production equipment will be no higher than 10 feet and will be placed in such a manner to screen to the extent possible from view by visitors along the trail system.
- All production equipment will be painted in a manner that makes such equipment less visible to any visitors on the trail system. Exceptions would be any equipment required to be painted certain colors for health or safety reasons.
- Maintain the existing bridge on BLM Road 4106 in same condition as currently found and assume responsibility for repair of any damage occurring due to use of the bridge for approved drilling or production operations.
- Any pipeline crossing the historic trail system would be placed within existing BLM Road 4106 disturbance area.
- Wolverine will fund or conduct all required fieldwork, document research, and analysis necessary to complete the National Preservation Act Section 106 compliance process (36 CFR 800) or National Cultural Programmatic Agreement and Wyoming State Protocol prior to any surface disturbing activity.
- Surveys for threatened, endangered, candidate, or proposed (T/E/C/P) or other species of concern (BLM WY list of Special Status Species per IM WY-2001-040, dated April 9, 2001) will be conducted and completed prior to any surface disturbing activities. Should any T/E/C/P or other species of concern be found during these surveys, construction and drilling activity could be delayed.
- Construction and drilling will be restricted between February 1 and July 31, in suitable sage grouse nesting habitat within 2 miles (including the 0.25 mile lek area) of a lek, and between February 1 and July 31 within 0.5-mile to 1.0 miles (depending on species) of an active raptor nest, and between April 10 and July 10 to protect mountain plover nesting based upon the results of on-the-ground surveys. If surface facilities are not constructed in CY 2001, additional spring surveys may be required. Restriction dates may be excepted if, after on-the-ground surveys, show the species of concern is not in or near the area where activity is proposed.

Should commercial quantities of natural gas be discovered, and Wolverine wishes to produce the well/s, a gathering and transportation pipeline would be required to move the gas to another existing pipeline system. Wolverine has not identified a potential pipeline route from the A3-8 well although any gathering pipeline would likely follow the access road as least part of the way. If a transportation pipeline is needed, Wolverine will be required to apply for a right-of-way (ROW) and submit a plan of development showing exact alignment, width, length, etc.

Based upon the analysis contained in the EA, additional mitigation measures were identified to further reduce potential impacts. These measures are adopted as part of this decision.

- Construction activities will be monitored by BLM personnel to assure proper placement of roads, wellpads, associated production equipment, and gathering pipelines.
- An Archeologist will be on-site during any pipeline construction crossing the historic trail

system or in other places associated with this action should it be determined after cultural surveys are completed, there are cultural resources within or near construction areas.

- The exact pipeline route will be determined after onsite investigations of potential routes in order to minimize potential viewshed impacts to visitors on the historic trail system.
- BLM will monitor the success of Wolverine's committed measures to evaluate success of these measures. Should monitoring show Wolverine's measures are ineffective, BLM may modify the measures to prevent any undue or unnecessary impacts to the viewshed or other resources.

Should the well/s not produce commercial quantities of hydrocarbons, the well/s would be plugged and reclaimed in accordance with the approved APD/Plan of Operations (incorporated by reference and on file in the RSFO), and any Conditions of Approval attached to the approved APD.

Rationale for the Decision

The Proposed Action is in conformance with the land use plan which allows for the leasing, exploration, and development of energy resources in an environmentally responsible manner and is in compliance with all applicable federal, state, and county authorizing actions. BLM released the EA on March 15th for a 30-day public review. No substantive comments, comments providing data to support claims, were received that require further analysis or selection of the No Action Alternative. A summary of comments from the public and BLM responses are presented in Appendix B.

Finding of No Significant Impact

Based upon the review of the EA, the BLM has determined that the Proposed Action with implementation of committed and additional mitigation measures identified above, is in conformance with the Green River Resource Management Plan. Implementation of this decision will not have a significant impact on the human environment. Therefore, an EIS is not required.

Appeal

Under BLM regulations, this decision is subject to administrative review in accordance with 43 CFR 3165. Any request for administrative review of this decision must include the information required under 43 CFR 3165.3(b) (State Director Review), including all supporting documentation. Such a request must be filed in writing to the State Director, Bureau of Land Management, P.O. Box 1828, Cheyenne, WY 82003, within 20 business days of the date of such notice of decision was received or considered to have been

received. This decision will be considered to have been received on the date that it is posted on the internet at http://www.wy.blm.gov/field_offices/rsfo/rs_home.html.


Assistant Field Manager for
Lands and Minerals

5-21-01
Date

Appendix A Errata

Since Wolverine's exploratory drilling proposal is near Congressionally designated National Historic Trails, the RSFO released the EA for review and comment on March 15, 2001. The version of the environmental assessment posted on the internet at http://www.wy.blm.gov/field_offices/rsfo/rs_home.html, entitled *Wolverine Exploratory Drilling in Close Proximity of the National Historic Trail System EA* (Wolverine_expldr1_ea.pdf) contained several errors (access document via NEPA link on homepage). These errors are corrected as follows:

Section entitled *Introduction/Relationship to Statutes, Regulations, or Other Plans*, add the following after the first paragraph: The National Park Service's *Comprehensive Management and Use Plan for the California National Historic Trail and Pony Express National Historic Trail and Management and Use Plan Update for the Oregon National Historic Trail and the Mormon Pioneer National Historic Trail* Draft and Final Environmental Impact Statements, and the associated *Record of Decision* (March 1999) apply to the designated national historic trails. The decision focuses on enhancing resource preservation and visitor use by achieving the highest possible degree of cooperation among those having administrative responsibility, private landowners, and interested publics. BLM has not formally adopted this strategy but is managing the project consistent with the selected management approach in the trail plan decision.

Section entitled *Proposed Action*, 3rd and 4th sentences should read: Typical drilling methods and standard operating procedures would be employed with two exceptions. The surface locations of the A4-33 and C4-25 wells were moved to better screen the wells from view of those visiting the trail system and will be directionally drilled to reach the target zone.

Section entitled *Alternatives Considered but Dropped from Detailed Analysis*, 4th sentence should read: Directional drilling techniques would be employed for the A4-33 and C4-25 wells.

Section entitled *Environmental Consequences*, 4th sentence should read: Should a pipeline be required to produce the A4-33 well, it would cross the trail system in the existing disturbance associated with BLM Road 4106.

Section entitled *Other Historic Period and Prehistoric Period Cultural Resources*, 2nd sentence should read: Following the processes under Section 106 of the National Historic Act and its implementing regulations as well as agreements, it should be possible to eliminate direct and indirect adverse effects to such historic or prehistoric properties through avoidance and/or mitigative measures (i.e., data recovery or recordation) on a case-by-case basis.

Appendix B

Summary of Comments on EA and BLM Responses

BLM received 17 comment letters including a form letter submitted by 260 individuals. All comment letters are summarized below (in italics) with BLM responses immediately following the comment. BLM appreciates all those who took the time to comment on the EA.

1. Shawnee Cavnar-Brown

I spent time last summer specifically to walk and see the Oregon Trail. The highlight of the trip was Parting-of-Ways near Farson and also spent time hiking South Pass and drove most of the trail from Independence Rock to Farson. One of the most fascinating aspects was that it hasn't changed. In many places, no sign of modern man, no telephone poles, wires, signs, paved roads, houses, anything. The thought of anyone doing anything to change that is upsetting and heartbreaking. So many things have been destroyed, so much of the trail itself has been paved over and called "progress." Wyoming holds some of the most pristine areas of the trail system and the finest ruts and most unchanged views of anywhere along the trail system and it should never change. A few miles further from the trail the companies can look for oil and gas and it won't be disturbing anyone. The whole experience of the trails would be destroyed if modern man and his buildings and wells and wires and pipes and fences encroach on the area. It is one of the few places left where you don't have to try to envision what it was like 150 years ago because it still looks the same. Make the company move a bit further out, away from the trails, and especially away from Parting-of-the-Ways.

Thank you for your comments. BLM understands your concern for protecting the historic trail system. In conformance with the land use plan, BLM leased lands adjacent to the trail system with certain protective measures to protect a 0.5 mile "buffer" area along the trail ruts. In addition, Wolverine has agreed to move 2 of the proposed wells so they are fully screened from view by those individuals visiting the trail system. The access road to the A3-8 well may be moved further after additional onsite investigation to further reduce the visual impact. Modern visual intrusions (radio and cell phone towers) can be seen from the trail. No wells are proposed in close proximity of Parting-of-the-Ways or South Pass.

2. Richard Klein

Hope and trust BLM will do all it can to protect the pristine emigrant trail ruts in Sublette County, especially those at Parting-of-the-Ways which are some of the best remnants in the West.

Thank you for your comments. Parting-of-the-Ways is located approximately 4 miles to the west of the closest well (CA-25).

3. Jim Gilbert

Opposed to the proposed drilling at the Parting-of-the-Ways along the Oregon Trail with all the land available to explore for gas and oil in the great state of Wyoming. There is no logical reason to explore there. This is an insane venture that will destroy the most significant land marks in our western history. As a 48 year old, third generation Wyoming native, I'm deeply appalled that your office is even considering this proposal, let alone taken the side of an out of state flyby night company with a bad EPA record. The BLM is supposed to look out for the people, not the greedy and uncaring oil companies. Tell Wolverine to stay away.

Thank you for your comments. Please see response to #2.

4. Lindsay Floyd

I'm saddened. If we destroy the history of this country, then we pretty much destroy its birth. Murder is a crime, whether it is the murder of a human being, or the murder of our history. Although I don't live in the area, I do like to visit it and hope that my grandchildren will be able to do the same and be able to view the land without the scene-blocking rigs of big business.

Thank you for your comment. With company committed measures (screening wells, painting, etc.) and other mitigation, the trail system and the overall view from the trail will remain intact.

5. Kathy Gilbert

Opposed to the proposed drilling activity near Parting-of-the-Ways. The area is some of the most beautiful, undisturbed, and historic trail swales in the nation. Unless drilling can be done with no visible effect on the area, it should not be done at all. Millions of Americans have ancestors who traveled that route, there are very likely graves in the area and it would be desecration to disturb them. The entire corner of the state is beginning to look like 'multiple use' means multiple drilling rigs. Surely something must be scared.

Thank you for your comments. See response to #2. Wolverine has agreed to move the well locations so that they will be screened from view by those visiting the trail system.

6. Richard Ackerman, Oregon-California Trail Association

I finished reading the EA for the 4th or 5th time and am amazed at the amount of work and research your group in Rock Springs put in to complete this document. I'm certain that the team from Wolverine contributed significantly to the document. Want to thank all of you for what appears to be an excellent document. Two incidents associated with this project interest me: meeting with 4th grade class members that wrote to me and Wolverine, and the March 15th meeting in Rock Springs. Driving away, it has renewed my faith that people of different backgrounds, priorities, and agendas can sit down and talk these things out and reach an agreeable decision on difficult issues.

There is never enough stress or importance about the historical background and importance of these trail segments for future generations in reports like this. Fur traders and trappers of the early days used the term of South Pass rather early when crossing the Continental Divide at this location. Pioneers were a different sort of traveler and curious about they called this area, I pulled the journal of Martin Reading, a traveler in 1843. He wrote "On August 7th, this morning left the river and traced it nearly to its source after traveling about eight miles in a southwesterly direction crossed the dividing ridge of the water from the Atlantic and the Pacific Ocean." In the journal of Elizabeth Dixon Smith who traveled in 1847 wrote on July 31st "Passed over one mountain and camped at the foot of the South Pass. Here we found some goose berries. The next day August the 1st, passed over the Rocky Mountain, the backbone of America." On August 22, 1843, Theodore Talbot said "Today we set foot in the Oregon Territory, the land of promise. As of yet, it only promises an increased supply of sagebrush and sand." What we must not lose sight of is that these early travelers over this dirty, dusty, rocky ribbon of a trail made a difference. They were settling the Pacific frontier and with these settlements made our country the ocean to ocean nation it is today. Today's traveler along this route would like to have a similar experience these pioneers had. They like to stand there and look both ways and try to imagine what it was like for those early travelers. This is why we need to do our best to keep it looking the same. Thank you for allowing me to participate and let's all keep working together to make this a successful project. Let's hope Wolverine finds the energy it's looking for.

Thank you for your comments. BLM appreciates your recognition of the effort that it has taken to place the wells in such a manner in order to accommodate visitors to the historic trail while maintaining Wolverine's rights under their valid leases.

7. Jere Krakow, National Park Service

Thank you for the opportunity to comment on the EA and participate in the meeting March 15th. Efforts by the BLM and Wolverine to reduce the impact of development on the resources of the 4 historic trails are very encouraging. Slant drilling, screening structures, painting, etc. are very important actions to minimize negative impacts on trail resources and visitors.

Thank you for your comments. Please see response to comment letter 6.

Of the approximately 11,000 miles of the 4 trails, the Wolverine project is right on top of the very best of the trail settings anywhere. Visitors at this location can project back into the 19th Century in a manner that evokes the experience of being on a nearly pristine stretch of trail set in a truly magnificent landscape. It is analogous to visiting Yellowstone NP, an experience one can gain in few protected areas on public lands.

The November 1999 Record of Decision finalized the Comprehensive Management and Use Plan and Environmental Impact Statement for the California, Pony Express, and update for the Oregon and Mormon Pioneer National Historic Trails. Completed as required by Section 5(f) of the National Trails System Act, the management plan focused on cooperative partnerships to protect and interpret historic trail resources. This plan resulted from a close working relationship between the BLM, FS, NPS, and OCTA. It is an umbrella for subsequent planning efforts and environmental documents that encompass the national historic trails. It is an important document and should be given consideration under "Introduction/Relationship to Statutes, Regulations, and Other Plans" Particular elements of the trail management plan pertain to this project, particularly the "accordion approach" to landscapes along the trails and identification of the section of trail as a "high potential segment." Segment classification of the National Historic Trails Act determines the highest quality of trail resources that evoke a sense of the past. The other document pertaining to the EA is the "Memorandum of Understanding for the Administration and Management of National Historic and National Scenic Trails" which underscore coordination of planning and "interagency actions" to "help prevent adverse impacts to National Trail resources and the desired trail visitor's experiences."

BLM, in cooperation with the lessee, is approaching management of the area consistent with that identified in the Record of Decision for the Comprehensive Management and Use Plan and associated environmental impact statement for the historic trail system. BLM is using the "accordion" approach for viewshed protection by those visiting the historic trail system by screening the wells and access roads.

The Proposed Action section does not include reclamation and revegetation as it relates to construction scars made by roads for drilling, pipeline/s, or other activities during the course of drilling. Native species should be included as part of reclamation.

BLM would direct your attention to the second to the last paragraph under the section entitled Proposed Action. It explains that if the well/s are not productive, it would be plugged and abandoned, and reclaimed (including seeding with native species) in accordance with the approved APD/Plan of Operations, and Conditions of Approval attached to the approved APD. BLM cannot determine

exact species mix until on-site inspections are completed. The inspections will be conducted prior to approval of the APDs. BLM also recognizes that it will take some years before a reclaimed site will look the same as adjacent undisturbed areas.

The Proposed Action section contains a statement that “Wolverine would fund or conduct all required fieldwork, document research, and analysis necessary to complete the National Historic Preservation Act Section 106 compliance.” My concern is the potential conflict of interest if the funding and especially conducting the compliance requirements, is provided by Wolverine.

Only permitted Archeologists would be allowed to conduct such work and would report directly to the BLM, RSFO. In addition, BLM further mitigated this project to have an Archeologist on-site during any pipeline construction crossing the historic trail system or in other places where it is determined once cultural surveys are completed, there are cultural resources within or near construction areas. BLM feels comfortable that cultural and historic resources will be appropriately protected.

Under “Alternatives Considered,” directional drilling from one pad to drill 3 wells is deemed unreasonable. The assumption is too expensive. The potential for compromising the setting for the 4 national trails is thereby significantly increased. Though a monetary value is difficult to establish for impacted trail resources, once comprised the impact is forever. It seems trail resources are devalued.

Directional drilling 3 wells from one pad location was considered but dropped from detailed analysis for reasons beyond expense. These reasons include limitation on the amount of offset that a directionally drilled well can go which is currently about 5,000 feet (depending on below-ground geology). Even if all 3 wells could be drilled from one pad, the pad would need to be located in a place central to the downhole locations and that would likely mean the pad would be seen by those visiting the trail system. Wolverine is directionally drilling 2 of the 3 wells at considerable additional cost to vertical drilling in order to screen these wells from view by visitors along the trail system. BLM is a multiple use agency and valid, existing rights to explore for and produce fluid minerals are held by Wolverine. There are many existing modern intrusions in the area including a heavily used highway, and a radio tower and a cell phone tower are clearly visible from the trail.

Section entitled Affected Resources concluded that South Pass National Historic Landmark will not be affected. One element not fully established is the boundary of the Landmark. It is possible that new boundaries may be established and portions of the Wolverine project area could be included. I submit that Dry Sandy Crossing, ruts, water wells, Pony Express Station, campsite, and natural features make up an ensemble of trail resources of as high a quality as those in the adjacent South Pass.

No development is proposed that would affect Dry Sandy Crossing, trail ruts, water wells, Pony Express Station, campsite, or other “natural” features (e.g., Plume Rock). Should the boundaries of the South Pass National Historic Landmark be determined by Congress, BLM will manage the area accordingly. Until such time, BLM must manage public lands in accordance applicable laws and land use plan mandates.

The maps at the meeting and included in the EA show new roads and the 7-10 miles of 12" pipeline could have considerable potential as adverse impacts to the trail landscape and experience of trail visitors. If screening is not carefully designed, the well pads and associated structures will have a negative impact too.

BLM and Wolverine have worked diligently to assure that well pads will be screened from view by visitors to the trail system to the extent possible while accommodating the lessee’s valid, existing

rights. It must be pointed out the area is not devoid of modern intrusions (e.g., roads, radio/cell phone towers, signs, etc.). Should commercial quantities of hydrocarbons be found, any proposed transmission pipeline routing would be analyzed and mitigated to reduce visual intrusion to the extent possible.

The section “Other Historic Period or Prehistoric Period Cultural Resources.” No assessment is given for Traditional Cultural Properties associated with centuries of American Indians in the area. Are there none or have tribal consultations been completed and reported elsewhere?

BLM has corrected the text to include prehistoric period cultural resources. See the errata. There are no site types (certain topographical features) that would trigger the consultation process with Native American groups in the vicinity of these 3 exploratory wells. Such consultations may be required should subsequent wells be proposed and then will be done in accordance with applicable procedures.

Section entitled Environmental Consequences/Impacts raises several concerns for protection of trail resources and subsequent quality of experiences by those visiting the trails. The discussion on cultural resources, the 0.25 miles on either side of the trail is the measure used for assessing effects on resources. That is too narrow a corridor especially given the very significant assessment of South Pass the BLM did in conjunction with the RMP. The concept of landscape is an important trail resource.

The Green River RMP identified a 1/4 mile protective buffer on each side of the trail system. Thus, the proposed action is in conformance with the land use plan. Modifying the RMP to accommodate an “accordion” buffer zone would require a plan amendment. Again, the area is not pristine as many visual intrusions exist and there are valid, existing rights involved. It should be noted that the area in question is classified as a Class IV visual resource management area which allows for major modifications to the landscape. Wolverine has moved the surface location for the 3 wells and to directionally drill 2 of them to screen them from view by visitors to the trail system. No surface disturbing activities are proposed within the South Pass Historic Landscape ACEC. The land use plan allows for mineral activity within the ACEC if potential impacts to visual and cultural resources can be mitigated (Green River Resource Management Plan, page 33). Management of public lands in and around the historic trail for the Wolverine project is consistent with that inside the ACEC.

Due consideration should be given to the trail management plan cited above which identifies this portion of the trail as “high potential segment,” evoking a sense of 19th century trail experience. The plan also utilizes the concept of the landscape as a trail resource and the “accordion approach” of landscapes as it relates to the surrounding landforms. A fixed 0.25 mile on each side of the trail subtracts the landscape as integral to trail resources and not worthy of protection.

These public lands were identified for fluid mineral leasing in the land use plan with appropriate stipulations to protect the trail. BLM has not formally adopted the NPS’ management plan and that plan must be reviewed via BLM’s planning criteria to determine if it meets BLM’s mandates. Until such time, BLM must manage these public lands in accordance with current mandates, including lease rights. Recognizing the sensitivity of the area to those members of the public interested in historic trail preservation, BLM and Wolverine have done everything possible to eliminate or reduce potential impacts. BLM also has the responsibility to make public lands available for domestic energy exploration and development for the general American public. Visual intrusions exist including US Highway 28, unpaved upgraded roads and 2-track trails, radio and cell phone towers, etc. BLM encourages members of the public to drive the historic trail.

The northern most well, A3-8 is the most troublesome as to visual impact. Screening and painting will reduce to some extent but the design should incorporate masking the entire pad and affiliated structures. Of particular concern is the road which is depicted on Map 1, extends over the top of the butte above the 2200 contour line. The scar of the road at the stated width of 14' in a road prism of 28' is a significant impact. It seems that relocating the road as it approaches A3-8 could be accomplished in a design that fit tightly on another alignment around the landform.

BLM, and Wolverine agreed, to move the well pad to the most suitable location which is 2.75 miles from the nearest point on the trail system. Additionally, for a visitor of the trail to see the well pad/road, they would need to look north, away from the ruts, to a specific point. The access road may be moved further once additional on-sites are completed.

As to the 12" pipeline has the potential to substantially scar the landscape and that would be adverse effect on trail resources. Sensitive design for the location of the line is critical as is the need to reclaim the scar with proactive vegetation plan. Though the use of the BLM Road is commendable for drilling and pipeline [crossing], extreme care should be given to the design of the pipeline route where it departs from the road corridor.

Whether or not a transportation pipeline is proposed is dependent upon the outcome of drilling and testing these wells. Should one or more wells produce commercial quantities of hydrocarbons, a transportation pipeline would be needed. It is at that time BLM will evaluate placement of the route and consideration of visitors to the historic trail system will be taken into account. All seeding of reclaimed sites will be with native species found on undisturbed areas adjacent to the reclaimed site.

The assessment that no cumulative impacts from the Wolverine proposal is questionable. Though several initiatives to soften the impact are taken by the corporation, significant additional initiatives need to be taken. If such efforts are not done from the start, trail resources will be compromised. Once lost, they are gone forever and no longer may be experienced by present and future generations. The legacy of what is done here will transcend time.

BLM disagrees with the contention that the cumulative impacts are questionable. Each affected resource was assessed for cumulative impacts. BLM cannot predict the level of future development until these wells are tested for production and it is possible there will be no commercial quantities of hydrocarbons found. Should additional development be proposed, BLM assures that your agency, as well as the public, will have the opportunity to provide input on initiatives needed to reduce possible impacts. Production from a natural gas well does not last forever and the vegetation of reclaimed sites will eventually mimic that of the surrounding area, particularly if they are recontoured correctly.

Should the project move forward and drilling begin in 2001, some coordination with OCTA should be arranged. The national convention for the trail association is scheduled in Casper, Wyoming in mid-August. Several members will be following the trail routes on their own or in guided tours during the period before and after the convention. Consideration should be given to activity and impacts during that time.

Each well will take approximately 90 days to drill and timing limitations end on or about July 31st. Delaying the activity for 3 additional weeks could force activity to occur later in the year when winter weather could prove problematic. Richard Ackerman, OCTA, did not indicate a desire to delay drilling activity (see comment letter # 6) to accommodate those attending the Casper convention.

In mitigation/monitoring requirements, BLM should take an active role in design and engineering of roads, pipelines, associated equipment, and pipelines. Such would ensure that trail resources would be protected. Monitoring construction of those activities is important, but engineering and design are vital for protecting resources.

The roads associated with 2 of the 3 wells will be designed by a licensed professional civil engineer. The 3rd road for the C4-25 well is short and need not be engineered. BLM will review the plans for adequacy and approve them if all road building issues are met. Road plans are checked to insure they are designed for adequate loading, speed limits, visual horizons, surface drainage, erosion, and dust control. The design engineer will inspect the road when it is completed. The design engineer (applicant) will send BLM a letter certifying the road was built to specifications contained in the road plan (plan of operations).

The significance of the Oregon, California, Mormon Pioneer and Pony Express National Historic Trails are of utmost and singular importance in understanding the history of this nation. Human experiences along the corridor range from the tragedy of American Indians and emigrants to the triumphs of the human spirit in the national expansion westward. Protection of resources to tell the story for present and future generations cannot be compromised, especially since we have the means to design and engineer resource development in ways that ensure protection of and passing along our heritage. We should transmit a legacy that demonstrates balance. Again, thank you for conducting the meeting and the opportunity to comment on the EA.

You are welcome and thank you for your comments.

8. Steven Kirkwood, Carol Perkins, John Booker, William Kirkwood, Peggy Brooker, Arlin Phillips, Steve Tofte, Robert Kirkwood, Viola Kirkwood, Susan Brauer, Patricia Williams, Sharon Peterson, Susan Kirkwood, Richard Williams, Joanne Jansma, Hollie Putt, Sue Benson, James Murphy, James Jablonik, S.J. Sansma Jr., Karin Ferguson, David Peterson, Mary Meisenbach, Jack Peterson, Warren Bailey, Jeffery Emmons, Kevin Allen, Evelyn Telgen, Nicole Christensen, John Vrona, Fran Vrona, Samuel Letts Jr., Josh Vrona, Shellie Anzaldúa, Carl Perkins, Steven Brauer, Sharol Adams, Celia Kirkwood, Jeff DeVree, Ellen Wilke, Arla Mulder, Terry Waner, Timothy Dillon, Stephen Nagengast, David Moore, Heather Erhard, Juliet Johnson, Larry Loughridge, Pamela Young, William Hazard, Abigail Koning, Stacey Jensen, James Bush, Diane Connell, Adrienne Alexamder, Gregory Blakemore, Janice Murray, Claude Vender Ploeg, Marilyn Fernstrum, Jane Blakemore, Nicole Dobbs, Suzanne Cole, John Sperla, Matt Drew, Eric Richards, Mark Nystrom, Doug Donnell, Victoria Kobza, Elizabeth Bransdorfer, Scott Drinkmeyer, Lana Ahumada, William Horn, Eric Bazzett, Barbara Myaard, Mark Van Allsburg, Micheal Reynolds, Robert Blocher, Penny Romans, Mary Weiss, Frederic Goldberg, Ronald Clark, James Brown, Deborah McPherson, David Fernstrum, Neil Jansen, Linda Luna, Stephen Mulder, Trisha Wabeke, Anthony Clark, Richard Connell, Richard Weber, Stan Gulch, Jan Thomas, Micheal Steenwyk, Mark Lutz, Theodore Diduch, Maurice Stahl, Lawrence Plaisier, Pierre Brazean, Dave Long, Barbara DeJong, Sandra Hoogeboon, Deborah Norman, Adam Bolthouse, Bill Thomson, Linda Cutris, David Perkins, Mark Schweda, Tracy Archubta, Marvin Willcox, Ken Phillips, Susan Wenger, David Curtis, Gregory Adams, Micheal Zagaroli, Kenneth Mrozik, Benjamin Zainea, Gerald Koning, Shawna Ainslie, George Guichelaar, Scott Bloem, Michael Lutz, Marrianna Hofmeyer, Cullen Hunter, Laura Koning, Johathan Nockels, D. Strickland, Jeff Coates, Andrea Kamps, Brett Yankee, Jean Meines, Phil Adams, B. Howard, Cheri Lutz, Rick Lewis, Michelle Baker, Sarah Gritter, Benjamin Bachelder, Kenneth Thomas, Ida Wilson, Andrew Ahonew, Jeffrey Greenfield, Walter Polus, Paul Bunning, Kim Stam, Rikki Ratliff, Patrick Martindale, Robert Young, Neven Fox, Julie Bruce, James Hall, David Miller, David Ford, Angela Peterson, Sarah Schutter, Jason Strickland, John Myaard, Carl Landon, JC Skowron, Rick Turnhill, Karla Westmaas, Susan Taylor, Brad McKenzie, Herb Albertson, Rebecca

Young, Sarah Zerfas, Barbara Boersma, Kris Mylaan, James West, Neil Kimball, Paul Haywood, Daniel Kubiak, Rebecca Blocher, Laura Hall, John Pluger, Celia Portillo, Arthur Bennet, Sharon Gatto, Nicole Telgen, Constance Smith, Rick Searcy, Teresa Smith, Rosalynn Reitsma, Alan Hampleman, Sharon Baumgard, Susan Drew, Daniel Molhock, Arlene VanderLoon, Scott Benson, Brian Faber, Patrick Pennington, Pete Mack, Sheila langworthy, Kimberly Williams, Alan Foraker, Tyler DeGraaf, Ann Faber, Stacy Dinora, Rosalynn Marcum, Doris Vierzen, Diane Luchies, Rick Correll, Linda Galien, Kimberlee Dahlke, Mari Brummel, Scott Hamlin, Beverly Grant, Shawn Baker, Calvin Reitsma, Janice Ericson, Robert Bulten, Ross Hoezee, Norma Frisbie, John Salas, John Kruizenga, Rhonda Pennington, Susan DeGraaf, Terry Langworthy, Betsy DeGraff, Lauren Bennett, Maryanne Correll, Ted VanderLoon, Carter Canyon, Elsie Smith, Gayle Wiers, Clare DeGraff, Laura Meenzs, Jennifer Hall, Jennifer Hall, Beverly Starrak, Laura Davarn, Christine Brinks, Michael Leasure, Herman Guikema, Karen Hall, Clifford Luft, Kelly Clum, Judith Hall, Cathleen Ruthruff, Daniel Brubaker, Scott Dwyer, Barbara Stork, Paul Long, Richard Hall, Vito Vallone, Carole VanEtten, Jay Ediger, Dennis Hall, Patricia Guikema, Robin Moss, Joyce Walstra, Bonnie Hofmann, Glen Walstra, Debbie Leasure, Kristen Roeters, William Lobenherz, Paul Braman, Dorita Wotiska, Cheryl Nitz

Have become aware of Wolverine's plans to explore for natural gas in Sublette County, Wyoming, approximately 19 miles northeast of Farson, Wyoming. This area of exploration is near the Emigrant Trail. The development is at least 1/4 mile from the Trail. In favor of exploring for natural gas in this area to increase our energy independence and provide jobs here in the United States. It's important that Wolverine follow appropriate rules and regulations to protect the environment and produce their wells in an efficient manner. Please encourage both development and conservation of our resources here in the United States. Approve of Wolverine's development.

Thank you for your comments.

9. Thomas Bell

Laws governing and protecting the National Historic Trails may have been violated by this proposal. I'm outraged that BLM is so insensitive as to allow leases that would put the Oregon-California-Mormon-Pony Express Trails in such jeopardy. Is there no conscience at work in any of the BLM staff to provide acknowledgment of natural history? Does every other value have to be prostituted at the altar of corporate greed/money? How many other leases has BLM allowed that would defile, degrade, diminish the integrity of nationally significant historic assets? The 3 wells bracket not only the Trails but the Dry Sandy Stage and Pony Express Station site. These Trails through this part of Wyoming are some of the last, best remaining segments of what was once hailed as the fulfillment of our "Manifest Destiny" in the migration of thousands of Americans to the Pacific Ocean. Have we forgotten the national significance? The location may be out in the middle of nowhere, but that is what makes it significant in historical terms. The encroachment upon the God-forsaken place diminishes the value of what we can go there and see as the efforts, the hardships, and the sacrifices of those pioneer emigrants as they passed this way. The few places remaining should demand special consideration and protection.

Thank you for your comments. Dry Sandy Stage and Pony Express Station sites are adequately protected. Please see BLM responses to comment letters 1 through 7.

Another consideration should be for the endangered sage grouse and the diminishing big game herds, thanks in great part to the proliferating thousands of oil and gas wells in southwest Wyoming. Every area that can be left alone give the native wildlife a little slack.

Greater sage grouse is not listed as an endangered species under the Endangered Species Act. Wyoming Game and Fish Department allows hunting of this species. Stipulations are in place to protect breeding and nesting activities.

Nowhere do I see the cumulative effects of this development and all the others. Oil and gas wells bring with them hundreds of miles of roads and pipelines, as well as other necessary infrastructure. What is that going to do to the integrity of the National Historic Trails. I prefer the No Action alternative.

Wolverine's proposal is for exploratory drilling to assess the potential for commercial quantities of natural gas. No field development is proposed at this time.

10.Dru Bower, Petroleum Association of Wyoming

Wolverine has agreed to numerous committed measures which go beyond the required protective measures established in the current land use plan. The applicant has demonstrated their willingness to work with BLM and as a result, disturbance is even further mitigated. These actions are voluntarily agreed to and should not establish precedent for future projects that are similar in nature. With existing protections in the RMP, applicant committed measures, and additional mitigation requirements, the project will have little to no adverse affects on the environment. No big game crucial winter range and no direct impacts to the trail system. Implementation of the proponent's committed measures to reduce visual impacts for those visiting the trail system is above and beyond that required under Class IV visual management objectives. The applicant is bound by the mitigation in the RMP to conduct and complete surveys for threatened, endangered, candidate, proposed species [and other species of concern] prior to any surface disturbing activities. Through the NEPA process, BLM has the option of applying additional mitigation conditions to protect a species and this issue is addressed at that time. Should a discovery be made and the applicant desire to proceed with additional development, appropriate NEPA analysis would be conducted at that time and adequate mitigation measures would be applied; therefore, this project should not be delayed based on the "potential" for development. Social-economic impacts to the counties and state were not addressed in the EA. A section should be added to discuss this. PAW recognizes that he social and economic opportunities generated from the project would benefit the residents of Wyoming and participating counties by directly creating new jobs and producing additional revenues particularly if further development is conducted after the exploratory phase. Wyoming has the opportunity to provide much needed natural gas to markets throughout the nation and this exploratory proposal has the potential to assist in that effort. Industry recognizes the importance of protecting the environment and has adequately addressed those concerns in this document. PAW believes that all concerns have been adequately addressed and mitigated to insignificance. PAW supports the Proposed Action.

Thank you for your comments. Although the exploratory proposal will require construction, drilling, and reclamation crews, BLM does not anticipate that new jobs will be created at the exploration stage. The likely result would be additional work for those already employed. If commercial quantities of natural gas are found, the impacts to the local and state economy would be analyzed through the NEPA analysis conducted at that time.

11.Julie Hamilton, State of Wyoming Office of Federal Land Policy

We have reviewed the EA and distributed the document to affected State agencies for their review. You will find letters from Wyoming Game and Fish Department, State Historic Preservation Office, and State Engineer's Office. Each agency comments are specific to their respective agency missions.

The State defers to their technical expertise but the responsibility to articulate the official, unified State position lies with the Governor or Office of Federal Land Policy.

We understand Wolverine has a right to develop their existing leases and support their ability to explore for resources but in a sensitive and responsible manner. Given the current interest in potential listing of the sage grouse as threatened or endangered, it is to everyone's benefit to be wary of effects on this species, not only from this development but from cumulative impacts in the area over time. Please feel free to consult with Game and Fish Department personnel for any concerns or questions you may have.

We also understand that the BLM and Wolverine have worked diligently with our State Historic Preservation Office regarding impact to the historic trails in the area. Thank you for your efforts and trust that the good working relationship will continue as this project moves into the final reviews. Finally, the State Engineer's Office stands ready to assist with the required permits and use agreements.

Thank you for your comments.

12. Steve Facciani, Wyoming Game and Fish Department

Our comments are specific to this agency's mission within State government which is "Conserving Wildlife, Serving People." The area provides seasonal ranges for the Sublette mule deer herd, South Wind River elk herd, and the Lander moose herd. The vicinity of the 3 exploratory wells is a well-documented migration route for the Sublette pronghorn [antelope] herd and numerous historic and/or active sage grouse leks. With the exception of the pronghorn migration routes, no crucial winter ranges for big game would be impacted. It is likely the area formally served as elk winter range and/or a migration route to the south, but with development of the Highway 28 corridor, this use has apparently become irregular.

Our greatest concern is the potential impact to sage grouse if additional development of the area occurs, as the EA states, grouse numbers in the area, and throughout the bird's range, have declined, and there is increasing concern for the species. In this area, it is likely that development of Highway 28 and the associated noise/disturbance have negatively impacted the local sage grouse population. While the EA adequately addresses the sage grouse issues associated with the development phase of the project, we are concerned that the long-term impacts of additional roads and human activity associated with the potential production phase have not been adequately addressed in the EA. We suggest the research conducted near Pinedale by Lyon (2000) be reviewed and considered in relation to this proposal.

BLM is aware of the Lyon study in the Pinedale area. If further development is proposed, BLM will likely initiate further studies to determine what the effects of development are and what measures can be taken to prevent further decline of this species.

13. Judy Wolf, State Historic Preservation Office

It appears wells A4-33 and C4-25 have been placed in such a manner that they will not be visible from the historic trail corridor. We appreciate the efforts of Wolverine and BLM in working to find a solution to what had previously been determined to be an adverse effect to the trail. We are still uncertain about the degree of visibility of the well and access road for well A3-8 from the trail. We would like to accompany the BLM on a field inspection of this well location to ascertain the degree of impact, if any, of the current location to the trail. The proponent stated in the March 15th meeting

that they are willing to employ camouflage techniques to minimize the visual effects of the well. Our primary concern is the degree of visibility of the access road from the trail.

Thank you for your comments. Please see the response for that portion of the comment letter # 7 pertaining to the A3-8 well access road. There may be opportunity to further move the access road to this well. BLM will be in contact with your office to schedule a date to conduct the on-site.

Should these wells produce, the location of the pipeline/s will also be of concern. Sensitive placement of the line, utilizing previously disturbed corridors, topography, vegetative cover, and perhaps camouflaging will be essential in avoiding adverse effects to the cultural landscape of the trail system.

Should commercial quantities of hydrocarbons be found, BLM will do everything reasonably possible to reduce visual impacts to visitors along the trail system by conducting further viewshed analysis (if needed) to assure the pipeline is properly placed.

Until Class III cultural resource inventories can be completed, and reports submitted for our review, it is not possible for us to fully determine the effects to the historic trails or other historic period and prehistoric period cultural resources. Consultation and a field visit by SHPO staff will be necessary before any determination of project effect on cultural resources can be made.

Class III cultural surveys and related reports are completed and consultation with your office will be done prior to approval of the APDs.

As stated in our August 30, 2000 letter, there needs to be a long range consideration of the cumulative effects of gas field development on this pristine segment of the National Historic Trails system. Wyoming is privileged to retain some of the very best remaining trail segments with an ability to convey a powerful sense of time and place. We feel very strongly that these last remaining representatives of our Nation's march across the continent deserve special attention, consideration, and protection.

BLM agrees that cumulative effects of gas field development should be addressed but until additional development is proposed, BLM has no concrete proposal to base the cumulative analysis on. Either one or more of these exploratory wells will produce commercial quantities of hydrocarbons or they won't. If not, further development would be unlikely. If commercial quantities of hydrocarbons are found, additional development would be likely.

14. David Benner, State Engineer's Office

Wolverine will probably need a permit or use agreement to obtain water needed for use when drilling the proposed exploratory wells.

Thank you for your comment. Wolverine will acquire all needed permits.

15. Randy Shipman, Frontiers of Freedom, People for the USA

EA states all prescriptions under the Green River RMP are to be met or have been exceeded. EA seems redundant in light of the 1997 ROD (land use plan). Review or consultation provided for by other persons and agencies evidently ensures that they are satisfied with the content of the EA. Based on the analysis, reviews, and measures committed to by Wolverine, we support that exploratory drilling should commence on a timeframe conducive to those measures without delay.

Thank you for your comments.

16. Will Bagley, The Prairie Dog Express

Disappointed to read about the proposal to drill exploratory wells less than a mile from the one of the most pristine sites in the entire length of the Oregon, California, Mormon Pioneer, and Pony Express Historic Trails. I am shocked that a government agency charged with the responsible management of America's public lands would produce a document so obviously slanted toward a resource exploitation proposal that is speculative at best and destructive at worst. Who authorized these leases in the first place?

Oil and gas leases are based on the Green River Resource Management Plan which allows for leasing of public lands with appropriate stipulations to protect important resources. The planning effort was subject to full public participation.

The proposal to drill 3 exploratory wells within 3/4 of a mile from 4 National Historic Trails is outrageous. At the Dry Sandy Swales, any American can see a world that looks very much as it did in the 1840s and 1850s. The value of such a place may be hard to calculate but its historic worth is beyond estimation. The expansive landscape and sweeping, unaltered views from these remote sections of trail, despite the EA's claim that the "area is not devoid of modern visual intrusions," may be unique in the entire trail system. On a recent visit, I missed the radio tower and found the roads and range improvements did not impact the area as much as 3 gas wells would, even if they are painted brown. Once the heavy traffic required to drill the wells has done its job, the roads would certainly be more noticeable.

Two of the 3 wells are at least 0.75 miles away from the historic trail system. The 3rd well is 2.75 miles away. All wells are screened from view, especially the 2 wells closest to the trail system. No additional disturbance is proposed outside the area where the existing BLM road 4106 crosses the trail system.

I found clear bias apparent on every page of the EA profoundly disturbing. Could not the BLM have allowed someone to provide a less enthusiastic evaluation of the potential cost and negative impact of this project? Isn't there anything inherently destructive in the proposal to run that much heavy equipment directly across the trail, over what is now a 2-track road? What exactly is "the extent possible" of minimizing the impact of this project? Given the fragile nature of the range in the area, the "extent possible" does not appear to be all that possible, let alone appropriate for this unique historic site.

BLM is required to objectively analyze the potential impacts and feels it has done so, especially since Wolverine agreed to measures to eliminate or reduce those potential impacts. With any surface disturbing action, there is a level of necessary and due impact. All practicable measures have been taken to reduce those impacts to the extent possible. All BLM roads are upgraded (crowned and ditched) and maintained roads. BLM contends that the range in this area is no more fragile than rangelands elsewhere.

Beyond the trail issue, BLM seems remiss in evaluating other likely harmful results of such an undertaking. The decline of sage grouse in this area to a 5th of their numbers in 1970 may be a mystery to the BLM, but does anyone suppose that locating 3 gas wells on their breeding ground will encourage the recovery of the birds?

Please see comment letter #12 for explanation of sage grouse decline in the area.

Disappointed in the absence of an honest evaluation of the financial impact of this project. Millions of Americans visit Wyoming every year to see the state's overland emigrant trails and experience a landscape that in many places has yet to be overrun with technology and development. Last time I checked, nobody visited Wyoming to see its scenic gas wells. As a conservationist, I support wise use of our nation's resources. While it might be instructive to let Wolverine roll the dice with an unlikely venture, it should not be done at the expense of an irreplaceable part of America's history.

BLM is a multiple use agency and one of the mandates is to provide lands for energy development which many millions of Americans depend on. All practicable measures have been taken to prevent impacts to the historic trail system.

17. John Rabitalle, Wyoming Business Council

These comments are specific to this agency's statutory mission which is to assure reasonable access to public lands. The project seems to be an example of responsible mineral development coexisting with wildlife, historic and cultural resources and public interest. Although 3 wells will be drilled, little or no impacts are shown in the EA. The impacts that could effect big game or avian species (sage grouse) have been or will be mitigated should full development of the field take place. All other associated impacts are shown as no cumulative impact or as temporary impacts.

Through special actions taken by the exploration company (painting, camouflaged netting), it would appear that Wolverine has gone beyond the typical requirements to drill exploratory wells. Page 15 states that implementation of the proponent's committed measures to reduce visual impacts for those visiting the trail system is above and beyond that required under Class IV visual management objectives and actions described in the RMP. If the exploratory wells prove to be economically productive, BLM would do additional analysis.

Thank you for your comments.