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Category: Other Comments

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Comment:

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Linda Slone
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Comments submitted electronically at www.blm.gov/rmp/casper/

Re: Draft Resource Management Plan and Environmental Impact Statement for the Casper Field Office Planning Area.

Devon Energy would like to thank the BLM for the opportunity to comment on the above referenced document. Devon conducts oil and gas operations on federal lands in Wyoming and has leases within the Casper Field Office Planning area.

Devon is a member of Public Lands Advocacy and the Petroleum Association of Wyoming which will be submitting comments on behalf of their membership under separate cover. Devon hereby supports and incorporates by reference comments submitted by those organizations.

Devon submits the following comments regarding the referenced document:

In general, Devon appreciates the efforts of the BLM to create a plan that allows flexibility as decisions are made. We believe it will allow the BLM to work with operators to address issues on an as-needed basis and therefore will be more appropriate to individual circumstances than trying to create a "one-size-fits-all approach.

Some of the specific concerns we found in the document are:

Pg. 2-24, 2.4.5.2 Physical, Biological, and Heritage Resources: "Like alternatives C and D, the use of pitless technology for oil and gas drilling operations is required when there is potential for adverse impacts to surface water, groundwater, or soils."

Comment: The use of the word "potential" should be changed to "significant likelihood" to more accurately reflect those instances where pitless technology would be the most appropriate action.

Pg. 2-24, 2.4.5.2 Physical, Biological, and Heritage Resources: "Occupied greater sage-grouse leks also have a 4-mile buffer"

Comment: It is not apparent in the document how the 4-mile buffer was determined. Supporting data should be included where changes are indicated from existing practices. Changes for current protection measures should be based upon peer-reviewed evidence.

Pg. 4-76, 4.4.2.2 Analysis of Alternatives: "Alternative E requires retreatment of reclaimed areas that do not have 30 or 50 percent of pre-disturbance vegetative cover in 3 or 5 years, respectively."

Comment: The pre-disturbance vegetative cover may not always be the correct indicator or reclamation. If the area has been subject to a severe drought or has been subjected to other adverse conditions such as a wildfire, the appropriate determinant may be the adjacent area. We would recommend the inclusion of "or adjacent" after the word "pre-disturbance."

In conclusion, Devon supports the efforts of the BLM to create a document that allows the field office to address emerging issues and changing circumstances as they are encountered. The BLM offices in Wyoming have the ability to facilitate the timely development of vitally needed energy resources.

Please do not hesitate to contact me should you have further questions or require additional information.

Sincerely,

Linda Guthrie
Sr. Regulatory Specialist
Devon Energy Production Co., LP