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**VIA ELECTRONIC MAIL and  
OVERNIGHT MAIL**

October 19, 2006

Ms. Linda Slone  
BLM Project Manager  
Casper BLM  
2987 Prospector Drive  
Casper, Wyoming 82604-2968

Re: Draft Resource Management Plan – Casper Field Office

Dear Ms. Slone:

Anadarko Petroleum Corporation (Anadarko) appreciates the opportunity to comment on the above-referenced document. Anadarko has considerable interests as a federal mineral lessee in the Casper Resource Management Plan planning area that could be affected by future management decisions. Of note are Anadarko's operations at the Salt Creek Field.

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We would like to commend the Bureau of Land Management (BLM) for the quality of document it has prepared. BLM has carefully weighed the management alternatives and has presented its analysis in a clear and concise manner. Although the document is well written, there are a number of instances in which BLM proposes to impose a measure without providing sufficient justification. For example, on page 2-59, BLM proposes to require linear surveys to include the lands for 100 feet on either side of the linear feature. We urge BLM to carefully review the document and revise it to provide sufficient justification for the imposition of any mitigation measures and to provide citations to appropriate scientific documents to support any changes in management direction.

Anadarko supports BLM's choice of Alternative E as the preferred alternative provided that the special management areas finally designated by the BLM coincide with areas of low development potential for oil and gas resources. To the extent that Alternative E would place major restrictions on areas with development potential, Anadarko urges BLM to reconsider the designation of any such areas.

### **Special Management Areas**

Both Alternatives D and E include the designation of a new special management area (SMA) for Salt Creek that would provide BLM with more management discretion with respect to the oil and gas development in this area while still accommodating other natural resources. As BLM notes on Page 3-1 17:

After a century of oil and gas development, the Salt Creek oil field area provides important grazing resources and habitats for nesting raptors, black-tailed prairie dogs, mule deer, pronghorn, and other birds and small mammals. The area contains prehistoric archeology sites, historic oil field sites, the Bozeman Trail, and provides for limited recreational opportunities in the form of hunting.

Anadarko fully supports BLM's proposal to designate the Salt Creek area as an SMA.

### **Air Quality**

The BLM should revise its analysis of potential air quality impacts to more clearly define BLM's role and to fully recognize the role of the Wyoming Department of Environmental Quality in regulating air emissions and setting standards for the control of any emissions. Of particular concern is BLM's statement in Table 2-3 on page 2-30 that it will "Reduce emissions from existing sources (by techniques such as more stringent Best Available Control Technologies)."

### **Cultural Resources**

Under Alternative E, BLM proposes to require block inventories for cultural resources. Although block surveys may be appropriate in some circumstances, Anadarko believes BLM should refrain from mandating such surveys and should instead revise the document to allow more flexibility by considering the use of block surveys on a case-by-case basis.

### **Sage-grouse Protection**

BLM has proposed varying mitigation measures for the protection of sage-grouse habitat throughout all of the alternatives considered - e.g., 2 mile controlled surface (CSU) use for nesting and brood rearing versus 4 mile no surface occupancy (NSO) and/or CSU and the ¼, ½ or ¾ mile NSO around sage-grouse leks. The document does not contain any references or clear explanation as to how BLM determined which mitigation measure would be imposed in a given situation. As BLM finalizes the document, it should provide clarification as to the method used to determine the applicable mitigation measure and provide citations to the appropriate literature or data sources that support the need to impose a measure to protect sage-grouse. In addition, BLM should quantify and compare the anticipated benefits to sage-grouse populations for each of the proposed mitigation measures described above.

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### **Other Wildlife**

Page 4-60: first paragraph states that; “The extent of fragmentation under each alternative is primarily anticipated to be a function of the amount of long-term surface disturbance in the planning area and proactive management actions anticipated to minimize fragmentation.”

BLM should revise the document to reflect that surface disturbance is not the sole factor to be considered when analyzing the potential for fragmentation of habitat. Other factors, such as the duration and level of activity, should be considered as well. Specifically, APC requests that BLM address, in its analysis, the differences between activity levels associated with initial development of oil and gas field and those that occur during the production phase.

On page 4-99, BLM should revise the document to reflect the potential benefit to wildlife from the surface discharge of produced water. As currently drafted, BLM only discusses the opportunity and importance of converting oil and gas wells to water wells to benefit wildlife. Wildlife can also benefit from produced water that is discharged to the surface. For example, surface discharges at Salt Creek have significantly benefited not only wildlife but have also been an integral component of many ranching operations allowing increases in stocking levels.

### **Historic Trails**

Under Alternative E, BLM provides for the management of national historic trails as Class II until inventories are completed. BLM should revise this management goal to provide more flexibility during the completion of any inventories. Not all of the portions of the trails warrant protection as Class II.

### **Stormwater Prevention**

Under Alternative E, BLM proposes to require a storm water management plan on all activities impacting more than 1 acre under Alternative E (page 4-128). Although Anadarko appreciates the need to address stormwater runoff, Anadarko believes that current state regulatory requirements adequately address this issue and BLM should revise the document to reflect the applicable state regulatory requirements.

### **Other Issues**

BLM should review the lands it has designated for retention and disposal to ensure compatibility with current proposals pending before the BLM. To the extent it may have proposals before it that would require disposal of lands within the Casper Field Office, BLM should revise the document to allow for disposal or for consideration of disposal on a case-by-case basis.

Finally, we note some of the following typographical errors or missing information. In Table 2-3, the legal description for the Table Mountain Wildlife Unit appears to be missing. It should be Niobrara County, T22N R60W.

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In Table 2-3, lines 6068 and 6069, Alternative E, the first sentence of the second bullet point should be revised to read “. . . as long as resource damage does not occur or new routes are not created.”

On page 3-13 in a number of places, BLM incorrectly refers to “WYNPDES.” It should be “WYPDES” and it would be helpful if BLM were to define it the first time it is used.

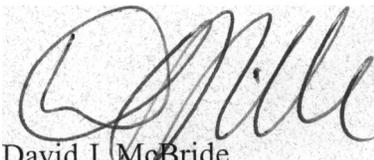
On page 3-90, the tables contain a reference to Class V VRM. This class no longer exists, and BLM should revise the document to reflect this change.

Anadarko supports and incorporates by reference the comments submitted by the Petroleum Association of Wyoming and the Public Lands Advocacy on the draft Casper resource management plan and accompanying environmental impact statement.

Thank you again for this opportunity to comment on the above referenced document.

Sincerely,

ANADARKO PETROLEUM CORPORATION



David J. McBride  
Manager  
Environmental and Regulatory

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