

LETTER 1

GENE R. GEORGE & ASSOCIATES, INC. Petroleum Geology, Engineering, Hydrogeology, Regulatory Permitting

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Casper, WY 82602

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June 16, 2003

Department of Interior
Bureau of Land Management
John Spehar, Project Coordinator
P.O. Box 2407
Rawlins, Wyoming 82301

Re: Comments: Draft Environmental Impact Statement, Desolation Flats
Natural Gas Development Project

Dear Mr. Spehar:

The following Comments are made on behalf of Yates Petroleum Corporation (Yates) as a leaseholder and participant in the referenced document and area. Yates appreciates the opportunity to comment on this document and on the environmental analysis of the proposed action and alternatives. Yates supports the proposed action. Current activity in the project area is limited but with higher natural gas prices and the demand for clean-burning natural gas for electrical generation, the Desolation Flats project area (DFPA) will certainly be held with increased interest by the energy companies.

The Energy Industry has consistently proven that it can come into a remote area, extract the resource and leave with little or no impact. As a case in point, the Jack Morrow Hills CAP area where the special interest, non-locally funded, groups claim that the area is pristine and they do not want any oil and gas activity, has 40 producing gas wells and 113 dry holes drilled within the CAP boundary. The Energy Industry has done such a good job that these special interest groups still consider it pristine. It is important to add that oil and gas activity is a relatively short-term activity. Essentially, all of the oil and gas disturbance will ultimately be reclaimed and left wild and scenic as before and the destination of choice of travelers from all over the world.

Page 2-38, Wildlife, This is the section referred to as the "operator committed mitigations" in the text but is not included in the section titles. These are primarily standard BLM requirements that have been proven through out the State of Wyoming that are fully protective of all resources. It should be noted that under the Wildlife Section that many of the mitigations may be waived by the Authorized Officer as the circumstances warrant.

Page 2-39 last bullet on the page. This should be rewritten to state: "To protect migratory birds and wildlife in general, all reserve and temporary workover pits that contain materials potentially hazardous to wildlife would be fenced and that

Yates/Desolation Flats/DEIS Comments

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other pits and areas that contain materials potentially hazardous to wildlife would possibly be both netted and fenced, in accordance with BLM requirements. Essentially, reserve pits and workover pits only contain RCRA exempt materials and not "hazardous wastes".

Page 3-39, 3.4.2.3 Waters of the US. It might aid to reference the COE General Permit 98-08 which considers and allows most oil and gas disturbances.

Page 4-119, Figure 4-15, It appears that the Federal Mineral Royalties block in the diagram representing \$1,609,000 is equal to the line representing \$1,500,000.

Page 5-11, 5.3.2.3 Cumulative Visibility Impacts, The CalPuff model, using the IWAQM/FLAG method, is extremely conservative. Only a model can calculate a 1/2dv change. To a human's eye, a one-half of a perceptible change in visibility is impossible by definition. Yates applauds the conclusion that it is background rather than the DF project that affects nearly all of the modeled changes.

Page 5-25 5.3.10 Visual Resources, The analysis of determining that a few "viewers" would be dissatisfied is short sighted. The oil and gas activity is short term relative to Wyoming's history. All of the oil and gas activity will be reclaimed and the viewshed will become "historical" within a lifetime.

Page H-5, Table H-2, Yates applauds this type of monitoring. Yates is extremely interested in the actual (not the perceived) impact of its oil and gas activity. Yates participates in this same type of monitoring and mitigation elsewhere on BLM lands and it is working well.

Yates Petroleum Corporation believes that the Draft EIS for Desolation Flats is an outstanding document and that the NEPA process should proceed smoothly toward initiating the Proposed Action. Yates is grateful for the opportunity to comment on this document.

Sincerely,

Gene R. George, Wyoming Regulatory Issues Agent for Yates Petroleum Corporation

Copies: Senators Mike Enzi and Craig Thomas and Representative Barbara Cubin
Robert A. Bennett, BLM State Director
Janet Richardson and Lisa Norton, Yates Petroleum Corporation

Yates/Desolation Flats/DEIS Comments

2

LETTER 2



ted kerasote
<tkerasot@wyoming.com>

06/19/03 09:12 PM

To: DesFlats_WYMail@blm.gov

cc:

Subject: to John Spehar, project coordinator

Dear John:

Many people who will write you letters about the Desolation Flats Project Area will have never been there. I have--many times--camping, hiking, driving through, scouting for deer and antelope. Wyoming is currently being hammered by oil and gas development, under enormous pressure from the federal government to achieve "national energy security." However, I don't like seeing my state trashed for this ephemeral goal, an unachievable one since only three percent of the world's oil and gas underlies U.S. soils.

I'd like to see Desolation Flats protected, but knowing that will never happen, I'm imploring you to see that energy development is minimized and what is done is done with an eye to protecting wildlife habitat. I don't have to go into the details about what that means. You know what it means. How about seeing for once that wildlife gets a fair shake instead of being analyzed to death under an adaptive management strategy while oil and gas wells sprout willy nilly.

Sincerely,
Ted Kerasote
Box 100
Kelly, Wyoming 83011

LETTER 3



Dave Kelsner
<dkelsner@rmisp.com>

06/21/03 08:11 PM

To: DesFlats_WYMail@blm.gov

cc:

Subject: Opposition to draft plan to open Desert Flats to oil drilling

Dear John Spehar:

I am writing this letter to you today as a concerned Wyoming citizen to voice my opposition to the BLM's planned development of the Desert Flats areas for oil exploration.

I believe The BLM preferred plan does not go into the detail needed to provide for a sufficient analysis of the impacts of the project. For instance, the DEIS states that there will be 385 wells drilled and about 500 miles of new roads constructed under the preferred plan, but does not identify the locations of either the wells or the roads. Without these crucial details, impacts to wildlife, recreation, and visual quality of the area cannot be accurately described.

Additionally, The BLM should withdraw from leasing or require "No Surface Occupancy" for oil and gas drilling on floodplains, roadless lands, and wilderness quality lands, crucial elk and deer winter ranges, prairie dog colonies, mountain plover habitat, and within three miles of sage grouse leks and one mile of raptor nests.

In the project area there are almost 50,000 acres of wilderness-quality lands adjacent to the existing Adobe Town WSA. These lands should be protected by incorporating them into the larger, existing Wilderness Study Areas. As I understand it, the FEIS does not have a true 'no action' alternative, and at the least, the plan needs to include language to allow mitigation and monitoring measures to ensure proper protection for the area's special values.

Again, I voice my opposition to the proposed gas development of the Desert Flats area and I wish the BLM would reconsider its stance on the issue.

Sincerely,

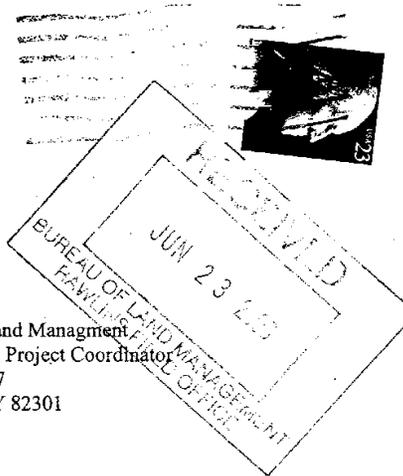
Dave Kelsner
Box 1782
Lander, WY 82520

Right now

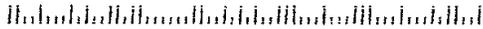
LETTER 4

Carol & Mel Hong
 226 Fairbairn
 Casper, WY 82601

Please include full name and address



Bureau of Land Management
 John Spehar, Project Coordinator
 PO Box 2407
 Rawlins, WY 82301



4-3

Dear Mr. Spehar,

The Desolation Flats project area contains spectacular public lands. In order to ensure adequate protection for the magnificent scenic and recreational value of the area as well as its outstanding wildlife habitat, I ask the Bureau of Land Management to:

- **Avoid drilling in environmentally sensitive areas such as wilderness quality lands, roadless lands, and important wildlife habitats.** The BLM should withdraw from leasing or require "No Surface Occupancy" for oil and gas drilling on floodplains, roadless lands, wilderness quality lands crucial elk and deer winter ranges, prairie dog colonies, mountain plover habitat, and within three miles of sage grouse leks and one mile of raptor nests.
- **Protect all lands within the Adobe Town citizens' proposed WSA.** In the project area there are almost 50,000 acres of wilderness-quality lands adjacent to the existing Adobe Town WSA. These lands should be protected by incorporating them into the larger, existing Wilderness Study Area.
- **Adopt a Conservation Alternative in the FEIS.** The FEIS must not only have a conservation (or true no action) alternative, but also adequate mitigation and monitoring measures to ensure proper protection for the area's special values.
- **Mandate the least environmentally damaging types of drilling.** Directional drilling should be required in the Desolation Flats Final EIS to minimize impacts to wildlife, recreation, and landscapes.

Signature:

Carol Hong, Mel Hong

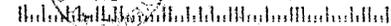
LETTER 5

Scott Dederich
 P.O. Box 1230
 LARAMIE, WY 82093

Please include full name and address



Bureau of Land Management
 John Spehar, Project Coordinator
 PO Box 2407
 Rawlins, WY 82301



Dear Mr. Spehar,

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- **Avoid drilling in environmentally sensitive areas such as wilderness quality lands, roadless lands, and important wildlife habitats.** The BLM should withdraw from leasing or require "No Surface Occupancy" for oil and gas drilling on floodplains, roadless lands, wilderness quality lands, crucial elk and deer winter ranges, prairie dog colonies, mountain plover habitat, and within three miles of sage grouse leks and one mile of raptor nests.
- **Protect all lands within the Adobe Town citizens' proposed WSA.** In the project area there are almost 50,000 acres of wilderness-quality lands adjacent to the existing Adobe Town WSA. These lands should be protected by incorporating them into the larger, existing Wilderness Study Area.
- **Adopt a Conservation Alternative in the FEIS.** The FEIS must not only have a conservation (or true no action) alternative, but also adequate mitigation and monitoring measures to ensure proper protection for the area's special values.
- **Mandate the least environmentally damaging types of drilling.** Directional drilling should be required in the Desolation Flats Final EIS to minimize impacts to wildlife, recreation, and landscapes.

Signature:

I am in complete agreement with this statement Scott Dederich

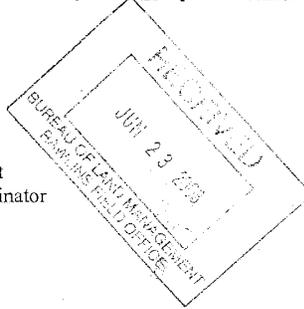
LETTER 6

Jeffrey C. Renner
P.O. Box 4102
Cheyenne, WY 82003-4102

Please include full name and address

Bureau of Land Management
John Spehar, Project Coordinator
PO Box 2407
Rawlins, WY 82301

82301+2407 22



4-4

Dear Mr. Spehar,

The Desolation Flats project area contains spectacular public lands. In order to ensure adequate protection for the magnificent scenic and recreational value of the area as well as its outstanding wildlife habitat, I ask the Bureau of Land Management to:

- Avoid drilling in environmentally sensitive areas such as wilderness quality lands, roadless lands, and important wildlife habitats. The BLM should withdraw from leasing or require "No Surface Occupancy" for oil and gas drilling on floodplains, roadless lands, wilderness quality lands, crucial elk and deer winter ranges, prairie dog colonies, mountain plover habitat, and within three miles of sage grouse leks and one mile of raptor nests.
- Protect all lands within the Adobe Town citizens' proposed WSA. In the project area there are almost 50,000 acres of wilderness-quality lands adjacent to the existing Adobe Town WSA. These lands should be protected by incorporating them into the larger, existing Wilderness Study Area.
- Adopt a Conservation Alternative in the FEIS. The FEIS must not only have a conservation (or true no action) alternative, but also adequate mitigation and monitoring measures to ensure proper protection for the area's special values.
- Mandate the least environmentally damaging types of drilling. Directional drilling should be required in the Desolation Flats Final EIS to minimize impacts to wildlife, recreation, and landscapes.

Signature: Jeffrey C. Renner

LETTER 7

BLM
Rawlins Field Office
John Spehar, Project Coord.

6/20
John Wahl
POB 2132
Flagstaff, AZ
RECEIVED 86003
JUN 23 2003
BUREAU OF LAND MANAGEMENT
RAWLINS FIELD OFFICE

Dear Mr. Spehar,

I'm writing to express my concerns about gas-drilling plans for the Desolation Flats Project Area. I understand that up to 385 wells, serviced by up to 500 miles of new road, have been proposed. Development at that magnitude would be extremely destructive, + I urge you + the BLM to scale back or eliminate the drilling.

Having in the past worked for 15 years in oil/gas exploration (some of that time spent in areas of the Red Desert, Bitter Creek, Kinney Rim, Elk Mtn.) I obviously am not opposed to some degree of resource exploitation. But we seem to have abandoned even the pretense of conserving fuels, + are targetting fragile + dwindling chunks of reasonably wild country without demanding, or even suggesting, rigorous safeguards or

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LETTER 8



Omahoneylawyer@aol.com

06/23/03 08:27 AM

To: DesFlats_WYMail@blm.gov
cc: woc@wyomingoutdoorcouncil.org
Subject: Desolation Flats Project Area

John Spehar, Project Coordinator:
Bureau of Land Management
Rawling Field Office

Dear Mr. Spehar:

I am writing to you in behalf of the preservation of the Red Desert against the unconscionable actions of the Bush administration.

As you know, just south of Wamsutter and west of Baggs lies the "Desolation Flats Project Area" - so named by the Bureau of Land Management. In fact, this 230,000-acre area of Wyoming's Red Desert is anything but desolate. On its western & northern boundaries it overlaps a portion of the citizens' proposed expansions to the Adobe Town Wilderness Study Area (WSA) - possibly the most spectacular set of badlands and geological formations in the entire state of Wyoming. It is just as wild, remote, and pristine today as it was when Butch Cassidy and his gang roamed there in the 1800's. Throughout, the area boasts magnificent scenery - like the eroded badlands of Prehistoric Rim and the rugged canyons of Sand Creek and Willow Creek - wild horses, outstanding sage grouse and mountain plover habitat as well as crucial winter ranges for deer, pronghorn antelope, and elk. In addition, there has been a recent wolf sighting near the area - the animal was possibly migrating from the north into Colorado.

I ask that you recommend and implement the following policies:

1. Prohibit drilling in environmentally sensitive such as wilderness quality lands, roadless lands, and important wildlife habitats. The BLM should withdraw from leasing or require "No Surface Occupancy" for oil and gas drilling on floodplains, roadless lands, and wilderness quality lands, crucial elk and deer winter ranges, prairie dog colonies, mountain plover habitat, and within three miles of sage grouse leks and one mile of raptor nests.

2. Protect all lands within the Adobe Town citizens' proposed WSA. In the project area there are almost 50,000 acres of wilderness-quality lands adjacent to the existing Adobe Town WSA. These lands should be protected by incorporating them into the larger, existing Wilderness Study Areas.

3. Provide a sufficient analysis of the impacts of the proposed project. The BLM preferred plan does not go into the detail needed to provide for a sufficient analysis of the impacts of the project. For instance, the DEIS states that there will be 385 wells drilled and about 500 miles of new roads constructed under the preferred plan, but does not identify the locations of either the wells or the roads. Without these

② protective exemptions.

Please do everything in your power to insure that:

A Leases are not granted in sensitive areas, & all decisions take into account the potential cumulative impact of full development of all leases.

B Directional drilling is used to the greatest possible degree, if & when leases are granted or explored.

C The Adobe Town WSA, & citizen proposed additions to it, be kept off-limits to drilling, pipelines etc. (+ new or upgraded roads).

D Wildlife & habitat values trump natural gas potential.

E All new roads kept to minimal standards & closed to public use (and reclaimed to the degree possible when wells are exhausted).

F Noise, dust & night lighting be strictly controlled.

Thanks for your time, & for the opportunity to comment.

crucial details, impacts to wildlife, recreation, and visual quality of the area cannot be accurately described.

4. Adopt a Conservation Alternative in the FEIS. The FEIS must not only have a conservation (or true no action) alternative, but also adequate mitigation and monitoring measures to ensure proper protection for the area's special values.

5. Mandate the least environmentally damaging types of drilling. Directional drilling should be required in the Desolation Flats Final EIS to minimize impacts to wildlife, recreation, and landscapes.

Thank you for your efforts to preserve Wyoming's wilderness areas rather than handing them over to the modern robber barons that would benefit from the Bush administration's destructive and deplorable policies.

Denis A. O'Mahoney, Esq.
Corona del Mar, CA
formerly of Worland and Cheyenne

4-6

LETTER 9



"Ted Zukoski"
<tzukoski@earthjustic
e.org>

To: <DesFlats_WYMail@blm.gov>
cc:
Subject: Desolation Flats EIS

06/23/03 09:37 AM

Bureau of Land Management
Rawlins Field Office
John Spehar, Project Coordinator
PO Box 2407
Rawlins, WY 82301

Re: Protect Red Desert

Dear Mr. Spehar:

Please accept these comments on the Desolation Flats project, which could degrade the wild Red Desert.

I request that BLM adopt a conservation alternative in its EIS. Such a plan should:

* Prohibit drilling in environmentally sensitive areas such as wilderness quality lands, roadless lands, and important wildlife habitats. The BLM should withdraw from leasing or require "No Surface Occupancy" for oil and gas drilling on floodplains, roadless lands, and wilderness quality lands, crucial elk and deer winter ranges, prairie dog colonies, mountain plover habitat, and within three miles of sage grouse leks and one mile of raptor nests.

* Protect all lands within the Adobe Town citizens' proposed wilderness. In the project area there are almost 50,000 acres of wilderness-quality lands adjacent to the existing Adobe Town Wilderness Study Area. These lands should be protected by incorporating them into the larger, existing WSA.

* Provide a sufficient analysis of the impacts of the proposed project. The BLM has not given the public the detail needed to provide for a sufficient analysis of the impacts of the project. For instance, the agency states that there will be 385 wells drilled and about 500 miles of new roads constructed in the project, but does not identify the locations of either the wells or the roads. Without these crucial details, impacts to wildlife, recreation, and visual quality of the area cannot be accurately analyzed.

* Mandate the least environmentally damaging types of drilling. Directional drilling should be required in the proposed Desolation Flats project to reduce impacts to wildlife, recreation, and landscapes. The proposed action could degrade the Adobe Town Wilderness Study Area (WSA) possibly the most spectacular set of badlands and geological formations in the entire state of Wyoming. It is just as wild, remote, and pristine today as it was when Butch Cassidy and his gang roamed there in the 1800's. The area boasts magnificent scenery, like the eroded badlands of Prehistoric Rim and the rugged canyons of Sand Creek and Willow Creek. It also provides habitat to wild horses, sage grouse and mountain plovers, along with crucial winter ranges for deer, pronghorn antelope, and elk. This area merits protection. As a Coloradan who visits southern Wyoming regularly to enjoy the awesome scenery and wildlife in southern Wyoming, I have a personal stake in protecting my public lands.

E.B. Zukoski
1105 Ithaca Drive
Boulder CO 80305-6329

LETTER 10

Linda J. Cooper
P.O. Box 121
Bondurant, WY 82922
ljinwy@wyoming.com
307-859-8455

Bureau of Land Management
Rawlins Field Office
John Spehar, Project Coordinator
P.O. Box 2407
Rawlins, WY 82301

June 23, 2003

Red Desert area: "Desolation Flats Project Area"

Dear Sir,

At first I was very concerned and confused about the Desolation Flats Area that is proposed for more energy development. I researched where this area actually was located and was shocked to learn that it was a spectacularly beautiful portion of the the Red Desert and even more shocking, that it apparently overlapped with the citizen proposal to expand the Adobe Town Wilderness Study Area. Now I respond with anger!

It seems as though the BLM is routinely ignoring the values of this area, not resolving citizen "compromises" placed on the table to introduce some semblance of conservation into what otherwise would be the rape of important Wyoming lands.

After all that is said, and you know how I feel about this matter, let me say that where lands have the same qualities as those already designated wilderness lands, they ought to be treated as such. In other words if it walks like a duck, and it quacks like a duck...it is a duck. If these lands are now non-industrial, have historic value, are roadless, have sensitive environmental values and habitat that supports the same wildlife, birds and ecosystem features that other protected lands do, then the BLM has an obligation not only to set these lands aside by incorporating them into the Wilderness Study Area, but a moral and legal obligation not to distort the will of the citizens who seek to rationalize a proposal they find inappropriate and to do the best job it can to conduct an impact analysis that actually focuses where the impacts might be. It appears as though the BLM didn't do this!

I believe that under EIS requirements the BLM has to develop other alternatives including conservation or no action alternative, mitigation strategies etc. After all when BLM proposes 500 miles of new roads and doesn't identify where a specific number of wells are going to be then it can and should be faulted for its work! You ought to tell the public where the drilling for 385 wells would be and specify what kind of drilling would be the best suited to mitigate impacts and permit conservation values to be upheld.

Removal of portions of lands otherwise targeted for development is not a crime. I think this might be reasonable to consider. Developing where the lands are less sensitive, is

advisable, and just because certain companies want what they want where they want it, doesn't mean that the agency in charge has to buy in lock stock and barrel. If BLM, who exists to "manage" resources on behalf of the public who owns the lands, I might remind the BLM to make sure that lands inappropriate to develop are not developed, and those that are, are done so with the best possible practices, and use of technology. Without such balance the BLM invites the kind of comments and challenges it gets!

It seems as though those of us who see the Wyoming energy development as nothing more than the rape and ruin of Wyoming for near term and very short-run benefit of gas producers and then also have to comment on BLM proposals such as this one, are insulted by BLM as much as the environment is assaulted. The final EIS that you must prepare, and prepare adequately, I might add, must minimize the risks to wildlife, landscape, habitat and recreation. I encourage you to do what is necessary and required of you in this process. My comments are written in anger and frustration that BLM does not do a better job and routinely ignores the stewardship responsibilities it has as a government agency.

Very truly yours,

Linda J. Cooper