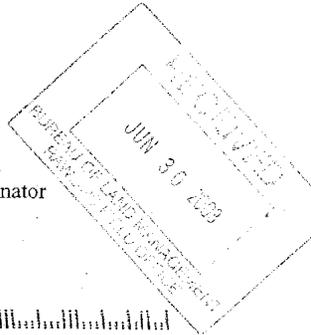


LETTER 121

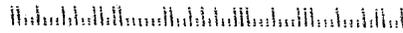
Teresa Ukrainetz
1731 Downey St.
Laramie, WY 82072

Please include full name and address



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

82301+2407 22

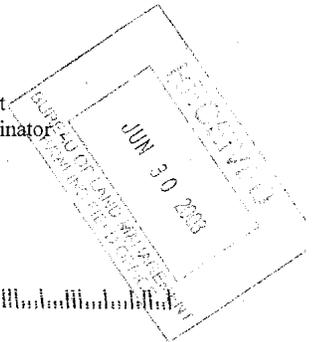


LETTER 122



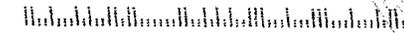
Jeff Lockwood
2069 N 16th St
Laramie, WY 82072-1904

Please include full name and address



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

82301+2407 22



4-76

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: J. Ukrainetz

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- **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: Jeff Lockwood

1



June 30, 2003

EOG Resources, Inc.
600 Seventeenth Street
Suite 1100N
Denver, CO 80202
(303) 572-9000
Fax: (303) 824-5400

Mr. John Spehar, Project Coordinator
Bureau of Land Management
Rawlins Field Office
1300 North Third Street
Rawlins, WY 82301

RE: Desolation Flats Natural Gas Field Development Project Draft
Environmental Impact Statement

Dear Mr. Spehar:

EOG Resources (EOG) submits the following comments with respect to the Desolation Flats Natural Gas Field Development Project Draft Environmental Impact Statement (DFNGF DEIS) to the Bureau of Land Management (BLM). EOG is committed to the responsible production of oil and gas resources within the Desolation Flats natural gas producing area of south-central Wyoming. EOG and its employees are committed to abiding by the Operator-proposed mitigation measures, as detailed in Section 2.5.2.11, developed to ensure protection of the environmental resources in the Project Area.

Alternatives Development:

EOG supports the selection of alternatives analyzed in the DFNGF DEIS. The exclusion of an alternative that could be considered a sort of "natural resource conservation" alternative, called the "directional drilling" alternative in the DEIS, quite properly reflects the resource protection measures already included within the Proposed Action. The reasons given to justify the exclusion of mandated directional drilling are accurate. The Proposed Action includes feasible and economic measures that would be taken by operators to reasonably minimize surface disturbance and includes the use of multi-well pads.

Operator-Proposed Mitigation Measures:

The employment of the Operator-proposed mitigation measures in addition to the BLM's Standard Mitigation Measures would provide an adequate measure of environmental resource protection such that additional mitigation measures would not be needed.

Air Quality:

The following comments are directed to the analysis of impacts to air quality.

- Impacts to air quality were measured against Colorado ambient air quality standards. Colorado lies south of the Project Area and is the nearest adjacent state. The DFNGF EIS states, however, the winds are predominantly from the south to the southwest (DFNGF DEIS, page 3-13). Prevailing winds would carry emissions associated with well development away from the state of Colorado, making impacts to Colorado's air quality unlikely. Its inclusion in the analysis is unnecessary. 2
- A number of the additional mitigation measures detailed in Section 4.2.5 are included in the DFNGF DEIS under Project-wide Mitigation Measures in Section 2.5.2.11. These include the commitments to use water or other approved dust suppressants on unpaved roads to reduce fugitive dust and the voluntary reduction of vehicle traffic speeds. Inclusion in Section 4.2.5 is redundant. 3
- Other additional mitigation measures detailed in Section 4.2.5 are irrelevant because of their impracticality. They include the replacement of diesel-fueled engines on drill rigs (described in the DFNGF DEIS as having no commercial substitute) and the construction of central tank batteries. Central tank batteries may not be feasible in some areas because of the distance between wells, which is governed by spacing rules and projected to be between two to four wells per section. Using electric engines on compressors would require a source of electricity at those locations where compressors are needed. The installation of aboveground electric power lines would be visually obtrusive and not economically feasible. 4
- Some additional mitigation measures detailed in Section 4.2.5 would require operators to install control devices that would decrease emissions below the levels set by Wyoming Department of Environmental Quality (WDEQ) regulations. For example, adding non-selective catalytic reduction devices would decrease NO_x levels to 70% of the allowable emissions by regulation. EOG strongly protests the requirement for emissions controls for engines that are operating within the regulatory limits of the State of Wyoming. The State of Wyoming has primacy over administration of the Clean Air Act within its boundaries. 5
- The analysis in the DFNGF DEIS was purported to not represent a formal PSD increment consumption analysis, stating that it is the responsibility of the Wyoming DEQ to conduct such an analysis if and when such an analysis becomes necessary. Therefore, without evidence developed by the state as a result of such an analysis, it is not reasonable for the BLM to require a NO_x emissions offset program for development of this Project 6

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LETTER 123 cont'd

Mr. John Spehar
June 30, 2003
Page 3 of 5

Mr. John Spehar
June 30, 2003
Page 4 of 5

at this time. Further, such a requirement exceeds the authority of the BLM.

- EOG supports the development of an air monitoring program within the state of Wyoming by the BLM in cooperation with the state, EPA, Southwest Wyoming Technical Air Forum, and other appropriate agencies/organizations. The accumulation of accurate data would decrease the BLM's reliance upon limited air quality data with which it must construct sophisticated models that may determine whether future projects, such as this project, are feasible.

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Soils:

The following comments are directed to the analysis of impacts to soils.

- The final surface disturbance numbers should be utilized throughout the EIS analysis in place of the initial surface disturbance numbers for analysis throughout the document. Reclamation efforts currently practiced by industry as part of interim reclamation would fully restore disturbed areas to their original state within a short period of time.
- EOG supports the conclusion that there would be little to no impacts to soils after the implementation of Project Area mitigation measures. As stated in the DFNGF DEIS on Page 4-35, most of the predicted eroded soil would be contained on-site and would not be transported off-site.

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Raptors:

The following comments are directed to the analysis of impacts to raptors.

- The DFNGF DEIS suggests closing roads located near active raptor nests. EOG supports this measure as long as operators are able to access their wells. Denying access to producing wells would prevent an operator's ability to perform routine maintenance and ensure that well site equipment is functioning properly. Road closure could result in unsafe conditions. EOG suggests that if a raptor establishes a nest that may possibly be impacted by vehicular traffic, use of the road should be prohibited to general public use but not to operators. Operator vehicle trips to producing wells would be minimized.
- The commitment to provide driver education to operator personnel is included in the DFNGF DEIS under Project-wide Mitigation Measures in Section 2.5.2.11.
- The proposed mitigation to disallow the construction of permanent aboveground structures within 300 meters or less...of any raptor nest (page 4-72)" unnecessarily prevents development near inactive or abandoned nests.

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- Mitigation measures proposed in addition to the ones listed in Section 2.5.2.11 must be based on documented scientific evidence that is current and appropriate to the area being analyzed. The DFNGF DEIS should include citations to these studies within the document to support the need for additional restrictions. More detail is needed to support the validity of these proposed additional mitigations.

13

Wildlife:

The following comments are directed to the analysis of impacts to wildlife.

- DFNGF DEIS suggests that "when 4-5 wildlife resource concerns are present within a section (22 sections), the BLM may consider a reduction in the number of well locations (<4) allowed within that section if well placement does not adequately avoid the resources (page 4-72)." Other mitigation measures suggest that wells be limited in areas of crucial winter range and that some roads be closed if they are located in big game critical range. As the BLM is well aware, EOG and other operators are currently subject to extensive wildlife restrictions that regulate timing and placement of well locations. Developing a well requires a great deal of planning and expense, but in most cases, EOG has been able to successfully drill wells that avoid adversely impacting wildlife. Limiting the number of well locations in areas of high wildlife density is effectively a mandate to directionally drill from a fewer number of available locations. For reasons adequately described in the DFNGF DEIS in Section 2.6.2, the use of alternative drilling technologies should not be presumed to be feasible on anything but a well-specific basis. The use of directional drilling or any other non-conventional type of drilling or production technique cannot be presumed to be able to access minerals in those areas where operations are excluded or restricted. In addition, the use of these techniques would incur extra costs to the operator. Economic considerations may preclude their use. An operator's inability to extract minerals from its leases is a denial of the rights associated with lease acquisition and could be construed as a taking. BLM Instruction Memorandum 92-67 clarifies 43 CFR 3101.1-2, which provides for a 200 meter general standard within which surface-use restrictions must fall. For any surface-use restriction that exceeds the 200-meter/60-day rule, the BLM bears the burden of establishing that the restriction is justified.
- "Avoiding" (Page 4-72) areas where four wildlife resources of concern overlap to reduce impacts is an unclear statement. Total avoidance may preclude mineral extraction, as described in the preceding bullet.
- Mitigation measures proposed in addition to the ones listed in Section 2.5.2.11 must be based on documented scientific evidence that is current and appropriate to the Project Area. The DFNGF DEIS should include citations to these studies within the document to support the need for

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4-78

LETTER 123 cont'd

Mr. John Spehar
June 30, 2003
Page 5 of 5

additional restrictions. More detail is needed to support the validity of these proposed additional mitigations.

The ability to extract natural gas from the leased public lands in the Project Area helps to maintain a stable economic platform for the counties directly affected by the finalized EIS, makes an important contribution to the economic health of the State of Wyoming, and helps to satisfy the energy needs of our nation. The hydrocarbon resources that exist beneath public lands are, in fact, owned by the public. Oil and gas operators in the management area provide the means to access and develop these oil and gas reserves, providing much needed energy to meet public demand.

Sincerely,



Sheila Bremer
Regulatory Coordinator

xc: Curt Parsons
Bob Davis

4-79

LETTER 124

**AIR QUALITY COMMENTS
DESOLATION FLATS NATURAL GAS FIELD
DRAFT ENVIRONMENTAL IMPACT STATEMENT**

General Comments:

1. Pg. 4-29, Section 4.2.5 Additional Mitigation Measures - A listing of potential mitigation measures is an essential part of the DEIS. However, the reasonable mitigation measures should include a measure of the improvements in environmental impacts along with the costs of mitigation. The benefits and costs of implementing mitigation are essential for the decision-making process. Without this information, the decision-maker is lacking information with which to make an informed decision. 1

2. Page 5-6, Section 5.3.2.1 Cumulative Emissions Inventory - Development in SW Wyoming is expanding with numerous oil and gas developments. Since May 2001, the South Piney project in Sublette County is proposing 210 wells, the Jonah Field Infill Drilling Project in Sublette County is proposing an additional 1,250 wells, and Seminoe Road CBM Project is proposing 1,240 wells. The Desolation Flats Technical Support Document for Air Quality Analysis was published in May 2001, and therefore, the cumulative emissions inventory is lacking some newly proposed developments. EPA recommends updating visibility and lake acidification impacts with results for Class I areas with results obtained from the Jonah Field Infill DEIS. 2

3. Page 5-11, Section 5.3.2.3 - Cumulative Visibility Impacts - The cumulative visibility impact analysis indicates that there potentially would be a total of 25 days with greater than 0.5 Δ dv and 7 days with greater than 1.0 Δ dv. EPA encourages BLM to work with the State of Wyoming in the development of a plan to reduce these potential impacts to regional haze. The development of energy resources in Southwest Wyoming are essential for economic health of the region as well as the economic health of the Nation. As discussed in this section of the DEIS, the impacts due to the development of Desolation Flats are minimal when compared to the potential cumulative impacts. As the manager of the public lands in Southwest Wyoming, BLM can play an important role in the development of mitigation steps to reduce these potentially significant air quality impacts. 3

Specific Comments:

1. Page 4-8, first paragraph. "The analysis of Alternative A represents the worst-case scenario". EPA would like to see a "most likely scenario" for air quality impacts 4

versus a "worst-case scenario". When a worst-case scenario combined with cumulative impacts shows significant environmental impacts such as visibility impacts in Class I areas, then the decision-maker would be uncertain as to whether or not mitigation of impacts is necessary. Only performing a worst-case scenario, increases the uncertainty of whether or not an impact will actually occur.

4

2. Page 4-11, Section 4.2.3.1.1. "The watering control efficiency was assumed to be 50%." Please state the rate of water application necessary to achieve a 50% control efficiency. A 50% control efficiency is not considered a "worst-case analysis of impacts".

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3. Page 4-14, Table 4-4. Please state the distance from a single well that these impacts are predicted to occur?

5

4. Page 4-18, second paragraph. Please site the EPA literature that says a more realistic exposure scenario is "64% of an individual's time spent outdoors at full concentration, and 36% of the time spent indoors at one-quarter of the full concentration, for a period of nine years ...".

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5. Page 4-20, Table 4-9. Please state the averaging times for the "Range of State Acceptable Concentration Limits".

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6. Page 4-20, Table 4-10. According to risk assessment guidelines, incidental carcinogenic risk numbers should be rounded to the next whole number. For example, a "1.6 in one million" risk would be 2 in one million risk. Recommend revising risk numbers in Table 4-10 to whole numbers.

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7. Page 4-24, second paragraph. Please provide justification for the statement "Regional background values were used for the comparison even though it is expected that the actual background concentrations in Dinosaur National Monument are less than the regional values assumed." With campgrounds and automobile traffic in Dinosaur National Monument, the background concentrations may be higher than the regional background values.

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LETTER 125

Duplicate of Letter 146. Refer to page 97 for comments.

United States
Department of
Agriculture

Forest
Service

Bridger-Teton
National Forest

340 North Cache
P.O. Box 1888
Jackson, WY 83001-1888

File Code:

2580

Date: June 27, 2003

Mr. John Spehar, Project Coordinator
BLM-Rawlins Field Office
P.O. Box 2407
Rawlins, WY 82310-2407

Dear Mr. Spehar,
This is in response to the BLM's Draft Environmental Impact Statement (DEIS) on the proposed "Desolation Flats Natural Gas Field Development Project." The comments addressed in this letter are related primarily to Air Quality. The Forest Service is very concerned about the effects this project may have on air quality in Southwest Wyoming, particularly in Wilderness areas and National Parks that have been designated as Class I by the Clean Air Act, but also including all wilderness areas managed by the Forest Service.

Recently, there has been a flurry of proposed, large-scale natural gas projects in Southwest Wyoming, including the Jonah II, Continental Divide/Wamsutter II, South Baggs, the Pinedale Anticline Projects and others. Air quality analysis conducted as part of the NEPA process for these projects indicate there is a small cumulative impact from these projects on visibility in nearby Federally Mandated Class I Wilderness areas. Section 169A of the Clean Air Act states "Congress hereby declares as a national goal the prevention of any future, and the remedying of any existing, impairment of visibility in mandatory Federal Class I areas which impairment results from manmade air pollution." Adverse impact on visibility means visibility impairment that interferes with the management, protection, preservation or enjoyment of the visitor's visual experience of the Federal Class I area. In accordance with this national goal, the Regional Haze Rule was promulgated in 1999. This rule compels state and federal agencies to improve visibility in the 156 mandatory Federal Class I national parks and wilderness areas. The rule requires the states, in coordination with the Environmental Protection Agency, the National Park Service, U.S. Fish and Wildlife Service, and the U.S. Forest Service, to develop and implement air quality State Implementation Plans to reduce the air emissions that cause visibility impairment.

In the review of the DEIS for the Desolation Flats Project, the Forest Service has noted some items which need to be addressed in the Final EIS, before an informed decision on the project can be made which will insure the protection of air quality values in Class I and other sensitive wilderness areas. In this letter we will highlight the major deficiencies and describe the problems observed in the review of the DEIS document. Detailed line by line comments are provided in the attached document (Comments on DEIS.doc).

1. Adequacy of the data analyzed

It appears as though the data for this analysis was collected in 2000 or early 2001, and the analysis was done based on that information. Much of the data used was actually older, (i.e., 1987-1995 for visibility) and was not updated with more recent information. It also appears that no effort was made to update either the data or the Reasonable Foreseeable Development (RFD) Scenario used in the initial analysis before the final release of the DEIS in April of 2003. Because of this, data used in the analysis is not the most current, and does not reflect current conditions on the ground. In the time from 2001 to now, there have been multiple Natural Gas and Coalbed Methane projects proposed and or analyzed which would have a direct effect on the cumulative impact analysis of this project. A partial listing of these projects includes: Powder River Basin CBM, Atlantic Rim, Modified Jonah II, Seminoe Road, Wind River, South Piney, Jonah Infill, Vermillion Basin, Copper Ridge and Jack Morrow Hills. All of these projects have a potential to contribute to cumulative air quality impacts in the Class I and sensitive Class II areas you described in your analysis.

For example: Modeling conducted for the Powder River Basin Coalbed Methane Project in Northeastern Wyoming has indicated possible impacts on Class I areas in Western Wyoming. The most recent modeling completed for the Powder River Basin project showed that PM₁₀ increments in the Washakie wilderness may be exceeded, and visibility may be impaired 5 days at the Washakie wilderness, 4 days each at the Bridger, Fitzpatrick and North Absaroka wilderness areas and 3 days in the Teton wilderness. This analysis also showed that the acid deposition

from the Powder River Basin Project alone would impact Upper Frozen Lake in the Bridger wilderness by increasing acidity by 0.5 ueq/l over baseline conditions, and that cumulative predicted impacts would be 180% of the acceptable change for Upper Frozen Lake. None of this information was presented in your Draft Document for the benefit of the public or the decision makers. However, it is logical to assume that development of 385 additional gas wells (250 producing wells) in the Desolation Flats area compounded with additional compression needed to move the natural gas through supply lines will potentially add to these negative effects on nearby Class I areas. The Forest Service feels the data used in the analysis was not current or adequate. We request that more analysis be done using current air quality data, current emission inventories, an updated RFD scenario including recently proposed projects and the incorporation of large scale impacts modeled by the Powder River Basin CBM project.

2. Significance of Air Visibility Impacts

In the discussion of visibility impacts, the BLM discloses that there are 25 days that exceed the 0.5 dv threshold as a result of the cumulative analysis and that there were seven days that would exceed the 1.0 dv threshold in the sensitive Class I and Class II areas studied. It is also stated the "On only two of the 25 days would the absence of the Desolation Flats change the visibility to levels below the thresholds, and these are for days slightly over 0.5 [delta] dv." This analysis did not include the projected emissions of RFD projects (as mentioned above in 1.), or any of those recent projects which have modeled emissions impacts.

The Forest Service has reviewed the days of modeled cumulative impacts that are greater than 0.5 dv change and have determined that the cumulative impacts from the Desolation Flats Project, combined with other recently proposed projects in SW Wyoming that were not addressed in this analysis are significant in increasing visibility impairment in the Bridger, Fitzpatrick and Popo Agie wilderness areas. It is also expected that if the portions of the Washakie and Teton Wilderness areas which are included in the modeling domain were considered sensitive receptors in modeling with the added emissions from the recently proposed projects listed above, that they too would show additional impacts.

For the Final EIS, the Forest Service requests additional modeling be done to include the Washakie and Teton wilderness areas, to evaluate if the updated cumulative effects analysis including recently proposed projects would have an impact on these sensitive areas.

3. Mitigation

In the DEIS, the BLM does discuss in general some air quality mitigation. However, in light of the modeled cumulative impacts from this project (even without consideration of impacts from the recently proposed projects discussed in items 1 and 2), the BLM needs to provide a better discussion of a wide scale of mitigation options and the related costs. The Forest Service believes that updated cumulative air quality analysis as requested in items 1 and 2 above, will highlight the need for some type of large scale mitigation to occur before this project can be authorized to move into the development stage.

Types of mitigation which could be considered include (but are not limited by):

- Large scale off-site mitigation (emission tradeoff such as completed by Naughton and Ultra Petroleum). This could be in SW WY or possibly in SLC if the decrease in emissions would benefit the Class I areas.
- Requirement of 50% dust abatement and low NOx compressors.
- Longer phased development (maybe over 100 years).
- Better coordination of activities with other emitters in the area.
- Use of wind generated power to offset emissions from compressors.
- Embracing new technology as soon it becomes available, with a goal of X% reduction in projected emissions in 10 years based on technology. (Note: we are talking about a 30 to 50 year LOP, so a lot can happen.)

The Forest Service requests the BLM to conduct an extensive analysis of potential mitigations (to determine costs, practicality and effectiveness) for the Final EIS which may reduce overall emissions affecting sensitive areas, including Class I areas while allowing future gas development to occur. The need for this analysis goes beyond this project, and will become necessary as new projects are proposed, analyzed and developed.

The Forest Service appreciates the opportunity to provide comments to the BLM on the DEIS document for the Desolation Flats Natural Gas Field Development Project. We would like to remain involved in this project to insure that air quality issues related to Class I and Class II wilderness areas are adequately assessed and addressed in the final environmental analysis of this project. Please contact Terry Svalberg, Air Quality Specialist on the Pinedale Ranger District if you have any questions or have any questions relating to the comments. Terry can be reached at: Phone: 307-367-4326 or Fax: 307-739-5750.

Sincerely,

Carole "Kniffy" Hamilton
Forest Supervisor

I Concur: T. Svalberg

Electronic Copies:
Dan Olson, WY DEQ
Robert Edgar, EPA

Darla Potter, WY DEQ
Jeff Sorkin, USFS

Levi Broyles, USFS
Rebecca Aus, USFS

LETTER 126

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

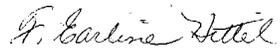
Re: Desolation Flats Project Area

Dear Mr. Spehar,

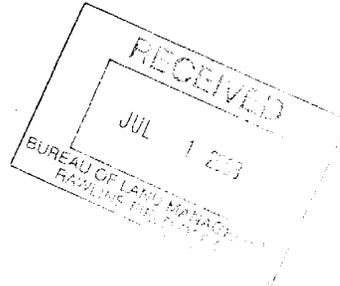
Please adopt a Conservtion Alternative in the FEIS for this area and also mandate the least environmentally damaging types of drilling.

Please consider the cumulative effects of development on the many species of wildlife and also on the spectacular landscapes.

Thank you,



F. Earline Hittel
36 Begonia
Casper WY 82604-3854



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LETTER 127

TRUE OIL LLC

895 WEST RIVER CROSS ROAD

P.O. DRAWER 2360
CASPER, WY 82602
(307) 237-9301
FAX (307) 266-0252

June 27, 2003

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



RE: Desolation Flats Natural Gas Field Development Project DEIS

Dear Mr. Spehar,

Thank you for the opportunity to comment on the draft EIS for the Desolation Flats Natural Gas Project. As a lease holder in the project area the requirements, operator agreed mitigation and the other possible stipulations are of great importance to True Oil LLC. As a relatively minor lease holder we did not participate in the operators groups that worked with BLM on the proposed action or operator agreed mitigation measures. We urge the BLM to make a few clarifying changes to the document and approve the final EIS allowing oil and gas development to go forward in the analysis area.

Recreation and Visual Resources: The potential impacts to recreation and visual resources from the proposed activity are considered in the document to be significant. Yet, in the document no quantitative information is provided relative to the level of documented recreational activity that takes place in the study area. We recognize the importance of the area to big game hunters but fail to see the significance criteria relative to a reduced sense of isolation or visual change. The mere fact that visitors to the Haystacks or Adobe Town might be able to look out of the WSA and see a gas field does not make the gas field a significant impact to the users of the WSA.

The level of recreational use of the area is variously described in the document as "low" and a few paragraphs later as "moderate". Which is it and what are the relative differences between the two. Perhaps interpretive signs could alleviate some of the lack of appreciation for the proposed activity. These signs could remind those traveling relatively long distances to hunt or picnic in the area that without the development and production of the oil and gas resource they would not be able to visit without a very long walk.

General Wildlife: We are impressed at the significant amount of field work that was conducted to create the wildlife section and the level of analysis that went into the document. The overlapping wildlife resources table in Appendix G greatly assists operators in determining what issues will be facing them as projects go forward.

We are concerned at the potential cost of implementing the wildlife monitoring plan (Appendix H). While a relatively low level of development will require a "reasonable" level of monitoring, the intensity of monitoring relative to development at 4 wells per

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section seems excessive. No information is provided regarding how these costs might be allocated among the various agencies and operators with interest in the area.

If all the provisions of Appendix H are implemented BLM will be overwhelmed with data. We suggest that BLM adopt, as part of its plan, the identification of key indicators by which system changes can be monitored. For each key indicator, the Review Team should identify triggers at which time, if exceeded, additional investigations would occur.

The information gathered through out the life of the project will provide much needed data regarding the affects of oil and gas development and production on wildlife. We urge BLM to maintain consistency with existing data collection protocols and survey guidelines so that at the end of the day the data are comparable.

Mountain Plover: We are taken aback at the level and complexity of protection afforded the Mountain Plover. We recognize the species has been petitioned for listing and that the BLM has a mandate not to contribute to the further decline of the bird but the number and complexity of mitigation measures afforded the species is overwhelming. As written it appears that annual surveys will be required to determine if potential habitat has become occupied habitat and if it is additional constraints will be placed on that years development activities.

Sage-Grouse: The document allows BLM to add a stipulation that suitable nesting habitat within a two mile radius of an active sage-grouse lek be avoided. This stipulation looks like a mapping requirement leading to a two mile NSO. If this level of information is collected and areas within the two mile radius are found not to contain suitable nesting habitat will they be dropped from the spring/summer protection standard or is this another stipulation that will not be amended.

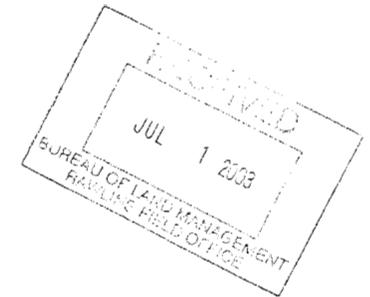
Wild Horses: We recognize the complexity of the regulatory process regarding managing wild horses. The herd is over objective. The range/vegetative resource has many management pressures from many directions including, but certainly not limited to, grazing by big game species, livestock and wild horses. Oil and gas activities further constrain the vegetative resource, slowly replacing it over time. The BLM is mandated with multiple use management of the public lands. We urge the BLM to reduce the number of horses to the population objective and allow the other legitimate uses of the resource to be permitted.

Sincerely,

Renee C Taylor
Renee C. Taylor
Environmental Coordinator

LETTER 128

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



Dear Mr. Spehar
Re: Desolation Flats Project Area

Once upon a time, as I flew over Wyoming on the way to what I thought of as "nicer" places to see, I would have agreed with the desolation depiction for the Red Desert area and other unpopulated, seemingly unproductive, wasted spaces. And even when I first moved here from New York City, I would drive along I-80 on the way to "nicer" places to explore and visit; then I got off the interstate.

I no longer have the Easterner's perception of such areas; they are not wasted and unproductive. They cannot be sacrificed because they serve no obvious purpose or are not sexy places to visit to see and be seen.

I recently spent three days traveling and camping in the southern part of the Red Desert. I understand now why pronghorns are the fastest mammal in North America; they seem to be catapulted across the desert. The majesty of the dozens of wild horse herds – how the stallion stands and defends, defies you to come close will never be forgotten. Through volunteering for the Game and Fish at Sybille Research Center I have embraced its management mission of protecting existing herds rather than producing herds which cannot be sustained because of disease and environmental issues. Winter range for elk and deer where the herds can be self-sustaining beats a feed ground where they are subject to Brucellosis. Hearing birds sing all through the night because they need to maintain claim to a few precious juniper trees and seeing a grove of junipers 400-500 years old are also reasons to leave much of the Red Desert as pristine as possible.

For the above reasons and more, I am lobbying for a conservation-minded alternative in the EIS. My group looked and looked and couldn't find mountain plovers, hence they need to be protected and allowed to produce. Prairie dog colonies are essential to Black-footed Ferrets; why are we breeding them in captivity as a G&F program if we do development which will destroy the habitats of their prey?

I have already addressed my concerns about the winter range for the deer, elk and pronghorn. When we were near a drilling operation, we saw that the earthen dam used to hold back the waste water was leaching into the creek – horrible enough – but when we walked toward the dam we saw that a pronghorn had been ensnared by the barbed wire needed to protect cattle from the polluted

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water. It was a blessing that we were in the right place at the right time to extricate that pronghorn but we couldn't help but be saddened by the idea of how many were lost each day because it was necessary to install barbed wire to begin with. I ask that the idea of "No Surface Occupancy" be part of the procedure for extracting oil and gas. If it need be done at all, let it be as minimally intrusive as possible. Do not disrupt the natural environments and habitats of native species. Mandate directional drilling so drilling works around, not through, sensitive areas.

We visited the Adobe Town Wilderness Study area; the idea that this phenomenally beautiful and rugged area would be impacted sickens. The badlands and geological formations rival all of what I have seen in this state and deserve as much protection as Brice, Grand Canyon and other national treasures. Leaving the Adobe Town Wilderness Study areas surrounded by 50,000 acres of unprotected wilderness-quality lands is like having Central Park in the middle of Manhattan; everything runs amuck around this haven and limits your enjoyment and enticement to visit it. Don't laugh off this analogy; think seriously about it.

I am opposed to the ideas of development but I can make a concession if the environment and its species are protected in a way that incorporates a conservation-minded approach and the public's wishes and opinions are considered. Please be forthcoming about the plans for where the wells and the roads will be so that we who care can continue to have input.

Thank you for your time and the opportunity to address these issues.

Sincerely,

RoseMarie Aridas
RoseMarie Aridas
810 1/2 Kearney
Laramie, Wyoming 82070
(307) 755-1539

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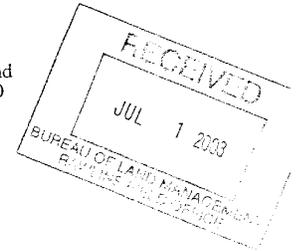
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LETTER 129

2443 Overland Road
Laramie WY 82070

June 30, 2003

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



Ref.: Environmental protection for Desolation Flats Project Area

Dear Mr. Spehar:

Certain areas of these United States simply *must* be protected for values beyond the short-term gains from commercial extraction of hydrocarbons. One of those area is the Adobe Town of the Washakie Basin in south-central Wyoming — and its buffering, immediate surroundings. The Adobe Town proper constitutes an area combining existing wilderness qualities, spectacular desert scenery, critical winter habitat for large ungulates, and essential summer habitat for many small vertebrates. Much of the area adjacent to the Adobe Town shares those same qualities, and U.S. citizens have proposed expansions of the Adobe Town Wilderness Study Area (WSA). Your "Desolation Flats Project Area," generally to the east, overlaps parts of those proposed expansions. In agreement with the posture taken by the Wyoming Outdoor Council, we request that all BLM-administered lands within the citizens' proposal be incorporated within the existing WSA.

BLM's "preferred plan" for gas development in the Desolation Flats Project Area does not document where the new roads are to be cut, nor does it provide information about the siting of the large number of planned wells. In anybody's book, that does not provide adequate information upon which environmental and scenic impacts of extensive development can be evaluated. BLM has allowed genuine environmental devastation — and almost total destruction of scenic values — in Wyoming's Powder River Basin through similar extractive activities, and you must not let that happen again anywhere within Wyoming — ever. For the Desolation Flats Project Area, your Final Environmental Impact Statement should contain a viable and strong conservation alternative. In the probable absence of a no-action alternative, at the very least you must provide reliable means by which directional drilling and similar means are applied to minimize the negative impacts of road building and commercial drilling.

Most importantly of all, however, BLM should express genuine breadth of environmental responsibility to future generations of Americans by prohibiting drilling in lands having wilderness quality, and in existing roadless areas, and within any lands containing habitats critical to wildlife.

The greater vicinity of Wyoming's Adobe Town is a fragile environment that forms a rich biological, geological, and historical resource for our nation in its present, undeveloped form. We will be considered as heroes by future generations if we protect the area *now* from unnecessary commercial extractive development — alternatively, our descendants will view us as a greedy and short-sighted generation if we do not provide a strong ethic of preservation for this area's natural environmental resources.

Sincerely yours,

Jason A. Lillegraven

Jason A. Lillegraven

Linda E. Lillegraven

Linda E. Lillegraven

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