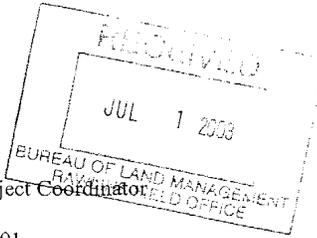


LETTER 130



Kenny Becker
P.O. Box 1335
Pinedale, WY 82941

John Spehas; Project Coordinator
P.O. Box 2407
Rawlins, WY. 82301

Dear Mr Spehas;

While resident of Sublette County for last thirty-three years, I utilized BLM grazing allotments for the cattle I was in charge of. I always maintained a good relationship with the BLM representatives, mostly because I treated that land as if it were my own, with the thought of using that land the following year.

What I am witnessing today in Sublette County is the end of Multiple Use on the people's land. The Oil and Gas industry is demonstrating what rapid industrialization is capable of. What has taken a million years of natural development to produce this? ecosystem, that most citizens of this county have benefited from and reduced it to the life you get on an oil pad access road. We had just as well pray to God that deer and antelope can figure out a new way to winter on the Mesa and Desert where the Anti-Cline and Jonah field have become reality.

Recently, a friend invited me to go camping in the Adobe Town Wilderness Study Area. I found this area to be an even more spectacular an area than other areas I am familiar with in the Red Desert. What I am most afraid of is that these special areas like the Honeycomb Buttes and Adobe Town will be roaded, pipelined, and so called developed for oil and gas retrieval, in other words sacrificed for the corporate benefit.

As a father of a twelve year old daughter I am afraid that these special areas and crucial wildlife habitats will be destroyed or compromised so that these children will not be able to witness these beautiful areas full of the most incredible natural diversity as yet common in the Red Desert.

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LETTER 131



"Becky Miller"
<brmiller@ida.net>
07/01/03 10:25 PM

To: "John Sephar" <DESFlats_WYMail@blm.gov>
cc:
Subject: Desolation Flats Project Area

Dear Mr. Sephar,

Please consider these thoughts in making decisions regarding the Desolation Flats Project Area: Please adopt a conservation alternative in your Environmental Impact Statement that will:

1. Prohibit drilling in sensitive areas and prohibit the drilling in floodplains, roadless areas, wilderness quality lands, and crucial wildlife habitat.
2. Provide a sufficient analysis of the impacts of the proposed projects. Due to pressure from large corporations and the current administrations policy's of rushing through this process, the BLM should not bow to this pressure, trusting that citizens want to protect what little wild areas are left. As you know development is encroaching on all wildlife habitat, please leave this area open, where wildlife, and vegetation can flourish. You know this development will diminish the quality of the habitat.
3. If drilling is to occur despite efforts like mine to stop it, please recommend the least damaging types of drilling, such as directional drilling to reduce the impact on critical wildlife habitat.

As you are well aware, elk and deer are loosing winter range and calving habitat at a rapid rate due to human encroachment whether it is housing development, recreation or natural resource development and harvesting. Please support the effort to force the development of alternative energies such as hydrogen, solar and wind power by refusing to allow drilling in this remote, fragile environment.

Thank You for considering these issues. Please listen to the voice of the people, deny drilling, the building of hundreds of miles of roads, powerlines and pipelines in this 230,000 acre section of the Red Desert.

Respectfully,
Becky Miller
P.O. Box 224
Inkom, Idaho 83245

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LETTER 132



"Deena McMullen"
<dmcullen@ipams.org>

To: <DesFlats_WYMail@blm.gov>
cc:
Subject: Desolation Flats Draft Environmental Impact Statement Comments

07/01/03 04:26 PM
Please respond to
dmcullen

Below as well as attached are IPAMS comments.

Dear Mr. Spehar:

These comments are submitted on behalf of the Independent Petroleum Association of Mountain States (IPAMS). IPAMS is the regional trade association in the Inter-Mountain West representing the interests of over 350 independent natural gas and oil producers, royalty owners, industry consultants, and service and supply companies operating in thirteen states, including Wyoming. Independent producers drill 85 percent of the wells in the United States, produce 65 percent of the country's natural gas, and 40 percent of the oil. IPAMS appreciates the opportunity to submit the following comments on the Desolation Flats DEIS.

President's Executive Order 13212

The BLM must follow the President's Executive Order 13212 (2001) in completion of the Desolation Flats EIS. In the Executive Order, the President directs federal agencies to evaluate current programs, policies and rules and to reduce barriers to America's energy self-sufficiency. The EIS should reflect federal law and policy and the nation's need for secure sources of domestic energy. The EIS should acknowledge that industry can develop the resources in an environmentally friendly manner while providing the nation with an abundant source of clean affordable energy. Furthermore, the BLM has a Congressionally mandated multiple-use mission, which must be honored and not compromised by the single-use land management objectives promoted by certain interest groups.

Companies exploring for natural gas and oil are important partners in efforts to conserve wildlife and habitat, and to preserve cultural and historic resources. Natural gas and oil companies often fund the research and monitoring efforts that assist land managers with managing the many resources found on public land.

Interim Development

During preparation of the Desolation Flats EIS, drilling activities should be allowed to proceed in accordance with regulations of the Council on Environmental Quality, particularly where the well(s) will not cause any adverse impact to the environment or will not limit the choice of reasonable alternatives.

Multiple-Use

A decision to remove further lands from the constantly diminishing multiple-use land base would have a detrimental impact on local economic opportunities and welfare. Consequently, IPAMS would strongly object to a no-lease or no-surface-occupancy stipulation decision for areas allocated to semi-primitive recreation. Lease stipulations should only be applied to protect a specific resource or value not sufficiently protected by standard lease terms.

Directional Drilling

BLM must not make assumptions that industry can directionally drill in any situation. Increased cost coupled with increased mechanical challenges may

prevent directional projects from ever being drilled and thus related revenues not realized by the state of Wyoming and the country.

Wildlife

When developing management practices and wildlife stipulations, the BLM should use sound science to determine wildlife patterns and whether restrictions are necessary. Too often, areas are closed or severely restricted based on faulty evidence. If no sound science exists that demonstrates the presence of a species in an area, the BLM should examine the area before making decisions that will govern land management for the next 10 - 20 years.

Water and Air

BLM should not impose regulations that exceed acceptable standards for the State of Wyoming.

Cooperating Agencies

IPAMS encourages the BLM to communicate early and often with cooperating agencies to prevent unforeseen delays at the eleventh hour. Cooperating with federal, state and local agencies in the early stages of preparation of the document will help the BLM produce a document that is thorough in its analysis.

Conclusion

Environmentally responsible development of natural gas and oil resources in the Desolation Flats Area will provide significant benefits to local communities, the state, and the nation. To successfully develop the resources in the area, all parties must work together to establish reasonable multiple use alternatives that will provide environmentally sound development of natural resources and minimize any impacts on wildlife, plants, and recreational interests.

IPAMS urges the BLM to move expeditiously to complete this EIS, avoiding all unnecessary delays, so that the nation, state, and county can continue to reap the benefits of multiple-use provided in this area.

IPAMS looks forward to continuing to cooperate with the BLM and work with all stakeholders to develop energy for the nation while protecting the environment. If you have any questions, please contact Deena McMullen, IPAMS at 303-623-0987. Thanks again for the opportunity to comment on this document.

Sincerely,

Deena McMullen
Manager of Government and Public Affairs

Deena McMullen
Manager of Government & Public Affairs
MT, WY, ND, SD
Independent Petroleum Association of
Mountain States

518 17th Street, Suite 620
Denver, CO 80202
303-623-0987
303-893-0709 FAX

<http://www.ipams.org>

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LETTER 133

June 30, 2003

Mr. John Spehar – Team Leader
Bureau of Land Management
PO Box 2407
Rawlins, WY 82301

RE: Comments to the Desolation Flats Natural Gas Fields
Development Project Draft Environmental Impact Statement

Dear Mr. Spehar:

Devon Energy Production Company, L.P. would like to thank the BLM for the opportunity to comment on the above referenced document. Devon has been actively engaged in the development and production of gas resources on federal lands located in the Great Divide Resource Management Plan for a number of years. We believe the Desolation Flats EIS will directly affect Devon's operations in the Washakie Basin and support the BLM's intention to update the plan so that future oil & gas development is not delayed.

Devon Energy supports the BLM's proposed alternative as outlined in the Draft Environmental Impact Statement, however Devon regards several items to be worthy of careful consideration as the process is refined. We offer the following specific comments in order of importance:

• Wildlife Mitigation

Current BLM wildlife mitigation stipulations are in effect over several months of the year, creating a very limited window for Devon Energy to drill, complete, and/or recomplete wells. These stipulations reduce our ability to efficiently produce the resource, causing unnecessary capital tie-ups and inefficient use of the reserve potential. The Council on Environmental Quality regulations on NEPA, section 1502, direct that mitigation measures be identified in the EIS which may be utilized to reduce or avoid impacts to other resource values. It should be noted that under the Wildlife Section of the Draft EIS, the Authorized Officer may waive many of the mitigation measures as the circumstances warrant. Devon feels it is necessary to discuss other types of mitigation, which could be utilized at the time of oil and gas drilling. Proper implementation of these mitigation procedures allows for oil and gas activities to be compatible with other resource uses.

• Directional drilling in land use decisions

The technology associated with directional drilling should not be considered a standard practice or stipulation for production in the preparation of the RMP. While some geologic formations may be considered to be good candidates, limitations are inherent in the technology. Generally, directional drilling is used for field development rather than exploration activities. Drilling of exploration wells is already a difficult and expensive undertaking because it is an attempt to determine where a structure may occur without the added knowledge of data from previously drilled wells in the area. The technical limitations of directional drilling do not make it a reliable tool for most exploration wells. Additionally, the costs associated with directional drilling are unpredictable, hampering the producers in their ability to accurately forecast the economics associated with developing leases. Only the operator can make determination of the feasibility of directional drilling or any other unconventional drilling technology.

• Well Spacing

The BLM will face increased challenges regarding wildlife mitigation, including Threatened and Endangered species, migration corridors and wildlife transition areas. Adding to this challenge are the ongoing studies of The Mountain Plover and the White Tailed Prairie Dog in the Desolation Flats area. The Wyoming Oil and Gas Commissions current requirements for spacing of well pads should continue to be utilized by the BLM as an effective and consistent approach to minimizing surface disturbance.

devon
ENERGY PRODUCTION COMPANY, L.P.

20 North Broadway, Suite 1500 Telephone: (405) 235-3611
Oklahoma City, Oklahoma 73102-8260 Facsimile: (405) 552-4667

- **Handling of existing lease rights under new plan**
Valid existing lease rights cannot be changed by a new plan. Voluntary compliance to the new plan may be sought from lessees if activities are initiated. Nevertheless, BLM needs to specify in the planning documents if and how valid existing lease rights could be impacted by the new leasing decisions. Specifically, potential conditions of approval for operations and other changes should be identified. 4
- **Existing Wilderness Study areas (WSA)**
The establishment of new Wilderness Study Areas should be curtailed during the preparation of the Environmental Impact Statement. This ensures that the decision-making process will remain consistent. Additionally, if the BLM allows new WSA's to be established or the expansion of existing WSA's to occur, current leases rights could be violated triggering costly litigation and delays in the timeline. 5
- **The requirement to prepare a Statement of Adverse Energy Impacts in the event opportunities to develop oil & gas are curtailed as a result of RMP revisions**
Devon is hopeful that the BLM will approach the matter of these new requirements in a collaborative fashion. We believe the intent of the National Energy Policy is not one of a punitive nature, but rather an effort to apply standard private sector accountability and reason to evolving circumstances. 6
A Statement of Adverse Energy Impact must be incorporated as standard operating procedure in the event that a decision or action directly or indirectly produces an adverse impact on energy development, supplies or distribution. Additionally, the Instructional Memorandum (2002-053) necessitates a careful consideration and justification of the decision under existing RMPs, establishing precedence during the preparation of new RMPs.
- **Post-plan monitoring program**
Currently the BLM is required to conduct certain monitoring activities. Devon feels that there is the opportunity to integrate a broader approach to monitoring so that the BLM can determine when activities are approaching the management threshold set forth in the plan. This will allow the BLM to avoid making knee jerk reactions to halt all activity pending completion of a new EIS. We recommend the BLM look into alternatives to expand and implement integrated monitoring of resources. Additional funding for expanded monitoring should be addressed perhaps by using MMS royalties or other funding sources. 7
7a

Devon Energy, as a member of the Petroleum Association of Wyoming (PAW), fully endorses PAW's comments that have been submitted under separate cover. If you have any questions or comments concerning these comments, please feel free to contact me at 307-265-3053.

Sincerely,

Todd Ennenga
Senior Government Relations Analyst
Western Division

4-87

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LETTER 134

Christine Cuchiterfels
954 Quiper Dr
Laramie WY 82070

Please include full name and address



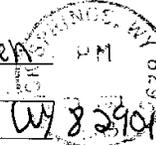
Bureau of Land Management
John Spehar, Project Coordinator
PO Box 2407
Rawlins, WY 82301



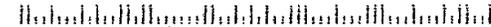
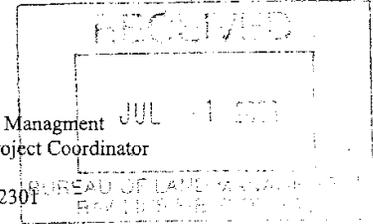
LETTER 135

Cindy Petersen
620 1/2 St.
Rock Springs, WY 82901

Please include full name and address



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



4-88

*Very, our quest for
answers. Please see comments submitted by
DOC, BLM, & others*

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: _____

John Spehar

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Signature: _____

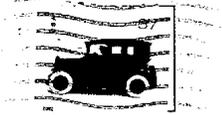
Cindy Petersen

LETTER 136

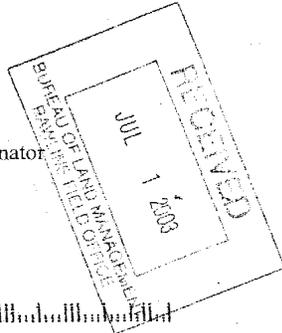


Ms. Priscilla Moree
302 S 10th St
Laramie, WY 82070

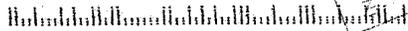
Please include full name and address



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



82301+2407 22



4-89

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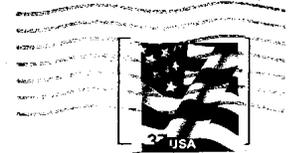
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Signature: _____

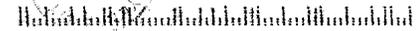
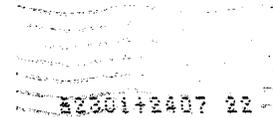
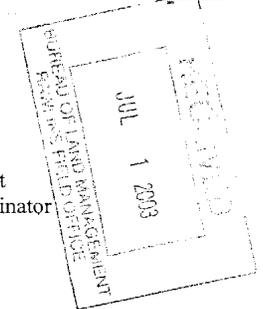
LETTER 137

Beth Buskirk
2710 Leslie Ct
Laramie WY 82072

Please include full name and address



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



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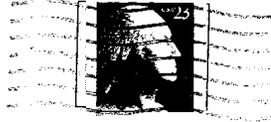
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Signature: _____

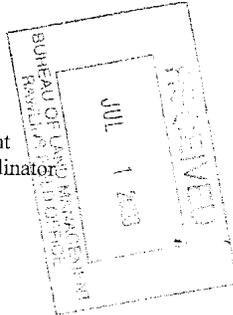
LETTER 138

Gretchen Yost
P.O. Box 2247
Rhedale, WY 82941

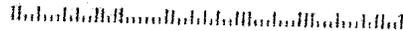
Please include full name and address



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



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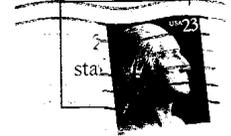


LETTER 139

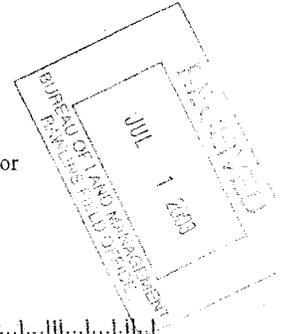


Mr Byril J Sander,
8300 W 131st St
Palos Park IL 60464-2120

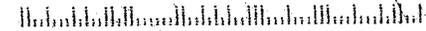
Please include full name and address



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



82301+2407 22



4-90

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