

DECISION RECORD AND FINDING OF NO SIGNIFICANT IMPACT

GMT Energy Corp. and Cabot Oil & Gas
Wind Dancer Natural Gas Development Project EA
EA No. WY-030-04-EA-204

Introduction

GMT Energy Corp. and Cabot Oil & Gas Corporation, both of Denver, Colorado, have proposed to explore and develop natural gas resources in the Wind Dancer Natural Gas Development Project Area (WDPA) located in Sweetwater County, Wyoming. The WDPA is located on federal surface estate administered by the Bureau of Land Management (BLM), Rawlins Field Office (RFO).

The Wind Dancer Natural Gas Development Project consists of the construction, drilling, completion, and production at a total of 12 natural gas well locations, the construction, maintenance, and use of appurtenant access roads, gas-gathering and gas-transportation pipelines, and utility corridors. The WDPA encompasses approximately 6,400 acres. The life of the project is estimated to be 30 years.

The WDPA is located in Township 24 North, Range 96 West, in Sweetwater County, Wyoming. Access to the WDPA is provided by several Sweetwater County and BLM roads from Interstate I-80. The WDPA is located approximately 30 miles north of Wamsutter, Wyoming.

Alternatives Considered

The Environmental Assessment (EA) for the Wind Dancer Natural Gas Development Project considered two alternatives. The Proposed Action Alternative assessed and disclosed the projected effects of GMT & Cabot's proposal as outlined above and detailed in the "Proposed Action" portion of the environmental assessment. The "No Action" alternative assessed the effects of not implementing any portion of the proposal. Under the No Action Alternative, the RFO analyzed the effects of a denial of any further development associated with this project. This alternative provides a benchmark, enabling the decision-maker to compare the magnitude of the environmental effects of the alternatives.

An alternative including mandated directional drilling was considered, but not analyzed further due to (1) lack of unresolved resource conflicts and (2) the technological and economical limitations imposed by this alternative for this particular project.

Decision

Based upon the analysis of the potential environmental impacts described in the EA, and in consideration of the public, agency, and industry comments received for the environmental assessment, the RFO has selected the Proposed Action alternative to be implemented. The decision incorporates the Applicant-Committed Mitigation Measures identified in Appendix B of the EA.

Approved Project Components

The decision authorizes the permit approvals for the following project components within the WDPA, subject to the requirements identified in Appendix B of the EA and the site-specific Conditions of Approval/Terms & Conditions applied to each APD or Right-of-Way.

- Construction, drilling, completion, production, and reclamation at 12 natural gas well locations within the WDPA.
- Construction of new access roads and facilities associated with natural gas development, including gas-gathering pipelines, gas-transportation pipelines, and production facilities.
- Upgrade, use, and maintenance of existing roads.

Rationale for Decision

The decision to approve the operator's proposed development was based upon the following factors:

1. Consistency with the Great Divide Resource Management Plan
2. National policy
3. Agency statutory requirements
4. Relevant resource and economic considerations
5. Application of measures to avoid or minimize environmental harm
6. Finding of no significant impact
7. Public comments, and
8. Consistency with the purpose and need for action

1. Consistency with Land Use and Resource Management Plans

The proposed action is in conformance with the planning direction developed for this area. The objective for oil and gas management decisions described in the Great Divide Resource Management Plan (1990) is to "provide for leasing, exploration, and development of oil and gas while protecting other resource values."

2. National Policy

Private exploration and development of federal oil and gas leases is an integral part of the Bureau of Land Management's oil and gas leasing program, under the authority of the *Mineral Leasing Act of 1920* and the *Federal Land Policy and Management Act of 1976*. The United States continues to rely heavily upon foreign energy sources. Oil and gas leasing encourages development of domestic oil and gas reserves, and reduces the United States' dependence upon foreign energy supplies. Therefore, the decision is consistent with national policy.

3. Agency Statutory Requirements

The decision is consistent with all federal, state, and county authorizing actions required to implement the proposed action. All pertinent statutory requirements applicable to this proposal were considered.

4. Relevant Resource and Economic Considerations

Environmental impacts from the project to resources identified in the EA are minor and all deemed acceptable. Positive economic benefits are expected from this proposal.

5. Application of Measures to Avoid or Minimize Environmental Harm

Federal environmental protection laws such as the *Clean Air Act*, the *Clean Water Act*, and *The Historic Preservation Act* apply to all lands and are included as part of the standard oil and gas lease terms. The adoption of the mitigation and monitoring measures identified in Chapters 2 and 4 of the project EA, and contained in Appendix B of the EA, along with the site-specific Conditions of Approval found in the Applications for Permit to Drill (APD) or Rights-of-Way, represent the best means to avoid or minimize environmental impacts.

6. Finding of No Significant Impact

Based upon the analysis of potential environmental impacts contained in the EA, the Authorized Officer has determined that the Proposed Action, with implementation of the protective measures identified in Appendix B of the EA and the site-specific Conditions of Approval applied to each APD, would not cause a significant impact to the quality of the human environment. An Environmental Impact Statement is not necessary.

7. Public Comments

The BLM conducted public scoping for this project between February 13 and March 17, 2004. A total of 13 comments were received by the BLM. The BLM subsequently requested comments on the prepared EA from the public, local landowners; and Federal, State, Local and County Agencies. The BLM released a press release with a brief summary of the proposed action, location of the project, and information about how the public could comment. In addition, the EA and its appendices and reference documents were posted on the BLM Wyoming internet site for review and downloading. The comment period ran from June 23, 2004 to July 23, 2004. A total of six comments were received by the BLM. The summarized comments and BLM's responses are found in Appendix B of this Decision Record.

8. Purpose and Need for Action

The purpose of the proposed development is to exercise the lease holders' rights within the project to drill for, extract, and market gas products. National mineral leasing policies and the regulations by which they are enforced recognize the statutory right of lease holders to develop federal mineral resources to meet continuing national needs and economic demands so long as undue and unnecessary environmental degradation is not incurred.

Appeal

Under BLM regulation this decision is subject to appeal. Under BLM regulation, this decision is subject to administrative review in accordance with 43 CFR 3165. Any request for administrative review of this decision must include information required under 43 CFR 3165.3(b) (State Director Review), including all supporting documentation. Such a request must be filed in writing with the State Director, Bureau of Land Management, P.O. Box 1828, Cheyenne, Wyoming 82003 within 20 business days of the date this Decision Record is received or considered to have been received.



Field Manager, Rawlins Field Office

07/28/04

Date

Appendix A to the Decision Record

ERRATA

Modifications and Corrections To The
Wind Dancer Natural Gas Development Project
Environmental Assessment

Chapter 2 –Proposed Action and Alternatives

Page 2-20, Section 2.3 was included in the electronic copy posted to the internet, and to which reviewers were referred for the public comment period. However, page 2-20 was not printed with the EA hard copies prepared and distributed at the Rawlins Field Office. Thus, the printed copies did not include the following page of text:

Chapter 2 - Proposed Action and Alternatives

- 1) the level or rate of development is no longer in the best interest of the public;
- 2) endangered or threatened species and/or their habitat would be adversely affected; or
- 3) the environmental impacts of the proposed action are unacceptable.

Federal, state, and fee oil and gas leases grant the right and privilege to drill for, mine, extract, remove, and dispose of all the oil and gas deposits in the leased lands, subject to the terms and conditions incorporated in the lease. The denial of the right to drill could void the lessee's contractual rights.

2.3 ALTERNATIVES CONSIDERED BUT NOT ANALYZED IN DETAIL

Some of the issues obtained during the scoping process suggested potential alternatives to the Proposed Action. These issues have been examined and a determination has been made that:

- The suggested alternative is non-viable for reasons indicated, or
- Applicant-committed mitigation measures will eliminate or mitigate the concern.

Proposed alternatives are required to be technically and economically feasible and to provide the opportunity to achieve the Proposed Project (CEQ, Forty Questions, 2a). BLM-mandated directional drilling was considered as an alternative. However, it was decided that the geologic nature of the target horizons, comprising series of discontinuous, lenticular, low permeability sand reservoirs at both shallow and deep stratigraphic levels, rendered directional drilling technology technically and economically unfeasible.

The responses from the public scoping period were considered to identify any unresolved resource conflicts. The BLM determined that no unresolved resource conflicts remained, with mitigation, that would require analysis of additional alternatives.

Chapter 3 –Affected Environment

Page 3-2, Line 7 shall be changed to “...and the underlying Cretaceous Mesaverde Group.”

Page 3-2, Line 21 shall be changed to “Production at Hay Reservoir is from the Almond, Lance, and Lewis formations and other formations within the Mesaverde Group.”

Page 3-22, Line 5 shall be changed to “...counties ranked 6th and 5th in the state in numbers of APDs filed with the WOGCC, and ranked 7th and 3rd in natural gas production.”

Page 3-5, Table 3.2 shall be changed as following:

Table 3.2 Regional Air Pollutant Background Concentrations and State and Federal Ambient Air Quality Standards, WDNAGDP ($\mu\text{g}/\text{m}^3$)

Pollutant/Averaging Time	Measured Background Concentration	State and National Ambient Air Quality Standards
Carbon Monoxide (CO) 1		
1-hour	2,299	40,000
8-hour	1,148	10,000
Nitrogen dioxide (NO ₂) 2		
Annual	10	100
Ozone 3		
1-hour	144	235
8-hour	139	157
Particulate Matter (PM ₁₀) 4		
24-Hour	20	150
Annual	12	50
Particulate Matter (PM _{2.5}) 4		
24-Hour	10	65
Annual	6	15
Sulfur dioxide (SO ₂) 5		
3-hour (National)	29	1,300
24-hour (National)	18	365
24-hour (Wyoming)	18	260
Annual (National)	5	80
Annual (Wyoming)	5	60

1. Background data collected by Amoco at Ryckman Creek for an 8-month period during 1978-1979, summarized in the Riley Ridge EIS (BLM, 1983).

2. Background data collected at Green River Basin Visibility Study site, Green River, Wyoming, during period January-December 2001 (ARS, 2002).

3. Background data collected at Green River Basin Visibility Study site, Green River, Wyoming, during period June 10, 1998 through December 31, 2001 (ARS, 2002).

4. Background data collected by WDEQ-AQD at Emerson Building, Cheyenne, Wyoming, Year 2002.

5. Background data collected at LaBarge Study Area the Northwest Pipeline Craven Creek Site 1982-1983.

Source: Environmental Assessment for the Atlantic Rim Coalbed Methane Project, Brown Cow POD, Carbon Co., Wyoming.

Chapter 4 –Analysis of Environmental Consequences

Page 4-8, Line 31 (4.8.1.2) shall have the following sentence inserted after "...damage (i.e., burrow failure) is not expected.":

"Implementation of the Proposed Action will increase the accessibility of white-tailed prairie dog colonies within the project area to human traffic, and an increase in the shooting of firearms may be realized."

Appendix A

Page A-3, Row 4, Column 1 shall be changed to "Drilling of Wells."

End Errata

Appendix B to the Decision Record

Summary of EA Comments and BLM Responses

The EA was released for a 30-day public review period on June 23, 2004. A total of six comment letters were received. The letters have been reviewed to determine whether the information they provided would warrant a determination other than a Finding of No Significant Impact (FONSI). Substantive comments are summarized below, with BLM responses to the comments in italics. The RFO would like to thank all who commented for taking the time to review the EA and provide comments.

1. U.S. Department of the Interior, Fish and Wildlife Service

- a) The Service recommends that netting, not flagging, be used to deter waterbird and other wildlife use of reserve pits.”**

Included as an applicant-committed mitigation measure, the operator will be required to comply with the following measures: “Fluids containing any hydrocarbons... shall not enter the reserve pit...” and “No fluids containing hydrocarbons or hazardous substances shall be allowed to accumulate in the flare pits” (Appendix B, B-3). Thus, many potentially toxic substances intrinsic to the proposed action will not be allowed to accumulate in pits. In the event an amount of hydrocarbons or other hazardous substance is inadvertently introduced into the reserve pit, the operator will be required to comply with the following mitigation measure: “... Netting is... ...required over reserve pits which have been identified as containing oil or hazardous substances...” (Appendix B, B-3).

- b) “The Service recommends that the BLM monitor the Project Area to ensure that garbage and sewage are properly disposed [of], and that State and Federal wildlife regulations are adhered to. Further, the Service recommends that all project employees are informed that white-tailed prairie dogs have been petitioned to be listed under the [Endangered Species] Act and are a BLM sensitive species.”**

The BLM implements a monitoring program to inspect wells permitted by the BLM to ensure that the operations comply with the Conditions of Approval with the APD, environmental regulations, and Best Management Practices. See “Errata” for additional language regarding Chapter 4 analysis. A condition of approval for all APDs will be added that requires the Operator to inform employees and contractors that white-tailed prairie dogs have been petitioned to be listed, and that the employees and contractors shall not harm or harass white-tailed prairie dogs. It should be noted that most companies prohibit the possession and use of firearms while working.

- c) “Within Table 3.1, Wetlands/Riparian Zones are listed as N/A or Not Present, but Page 3.7 in Section 3.4.1 Surface Water reports that “Red Creek... grazes the northwestern portion of the Project Area,” and that other areas “are drained by two unnamed easterly-flowing tributaries to the Lost Creek Lake, a dry lakebed.” Please clarify why these ephemeral streams and potential riparian areas were not considered in your analysis.”**

Red Creek, where it grazes the northwestern portion of the project area, does not support riparian habitat. The two unnamed ephemeral drainages do not support riparian habitat. As disclosed within the same paragraph on page 3-7, “the limited run-off seeps into the ground and/or evaporates almost immediately.” No wetlands or riparian zones were considered within the analysis because none exist within the project area.

- d) **“No information regarding the lack of habitat for Ute Ladies’-tresses or Blowout penstemon was given. Please explain what you considered as habitat for these species, and why these species likely do not occur on the Project Area.”**

On page 3-14 of the EA the assumed habitat description for Ute Ladies’-tresses was provided as “seasonally moist soils and wet meadow drainages below 7000 feet elevation.” These environmental conditions do not exist within the Project Area. Likewise, habitat for Blowout penstemon, consisting of sand dunes, does not occur within the Project Area.

- e) **“The Service recommends that project-related activities be located outside of [leks and/or nesting habitat for sage grouse].”**

Page 3-16 of the EA discloses the presence of 8 greater sage grouse leks adjacent to the Project Area. Of these, only a single lek is located within 2 miles of the project area. The remaining seven are located within 2 to 4 miles of the project area. A map showing the proximity of the single lek located within two miles (but greater than ¼-mile) of the Project Area and the corresponding stipulation buffer is shown on page 4-10 of the EA. With the applicant-committed mitigation measures and site-specific Conditions of Approval applied to each APD, the greater sage grouse and its habitat will be adequately protected from direct impacts resulting from the Proposed Action.

- f) **“Please describe more fully potential effects to wildlife of the two proposed well sites near burrows. What type of burrows are proposed activities near?”**

During the onsite inspection, it was noted that white-tailed prairie dog burrows were located proximate, but more than 50 meters, from proposed surface disturbances. A BLM biologist, present at the onsite inspections for the APDs, ensured that proposed surface disturbances would be located an appropriate distance away from active burrows.

- g) **“The Service recommends that the BLM consider [social organization] impacts to burrow-using wildlife, including white-tailed prairie dogs.”**

See answer for #1(f), above.

- h) **“We further encourage you to analyze potentially disturbed prairie dog towns for their value to future black-footed ferret reintroduction.”**

See answer for #1(f), above.

- i) **“The AOI used for Cumulative Impacts Analysis for smaller mammals and sensitive plants should be greater than the Project Area to account for individuals living on or near the edge of the Project Area.”**

Within the Project Area, the proposed surface-disturbing activities are located no closer than approximately 1500’ from the Project Area boundaries (the Haystack #11 access road), and most activities are located several thousand feet from the Project Area boundaries. This provides a qualitative buffer to the project locations. The BLM believes that the Project Area, then, is an adequate AOI for smaller mammals and sensitive plants.

- j) **“We recommend that the BLM relocate wells outside the 2-mile buffer when possible. If relocation is not an option, the Service recommends that project activities be prohibited in the area from March 1 through June 30 to avoid disturbance during mating, nesting, and brood rearing periods for sage grouse.”**

The two-mile buffer of the single lek within two miles of the Project Area encompasses approximately ¼ of the Project Area. Relocation would not be possible without straying from the Purpose and Need for the project, as the leaseholders in this area would not be allowed to develop their leases. Perhaps more importantly, the operator will be required to comply with the applicant-committed mitigation measures : “construction, drilling and other activities potentially disruptive to strutting and nesting sage grouse are prohibited during the period of March 1 to June 30” (Appendix B, B-7). In this context, the BLM has determined that there will be no adverse impacts to sage grouse.

- k) **“The Service strongly recommends protection measures as described by Connely et al. (2000), which bases protection measures on whether or not specific sage grouse populations are migratory and whether or not sage brush habitat is uniformly distributed.”**

As indicated in your response above, the seasonal restrictions and site-specific measures to avoid impacts to sage grouse will avoid disturbance to sage grouse during mating, nesting, and brood-rearing periods for sage grouse. The BLM has determined that there will be no adverse impacts to sage grouse.

- l) **“The Service recommends that [Rawlins Field Office raptor data archives] data or ongoing monitoring of active nests be used by the BLM to designate timing restrictions for breeding and nesting raptors within the Project Area.”**

This is exactly what was done in preparation and analysis (see page 3-16). Ongoing monitoring as part of the Rawlins Field Office biological monitoring program is continuing.

- m) **“We recommend that you contact the local Wyoming Game & Fish Biologist to determine local site specific dates for leking, and hatching and brood rearing period, then modify the timing stipulation to reflect a period of more thorough protection.”**

The seasonal restrictions encompass the period when reproductive activities for sage grouse would occur within the Project Area. BLM biologists routinely coordinate sage grouse lek monitoring and data collection with Wyoming Game & Fish.

2. Biodiversity Conservation Alliance

- a) **“The entire area of development will therefore become an avoidance area for elk year-round...”**

As discussed in the EA (see 4-7, citations for BLM, 2003d (Page 4-185), BLM, 1987 (Page 50)), the BLM believes that big game animals would tend to move away from active construction, but that avoidance by big game would be reduced once the operations reach the production phase. However, displacement effects from operations may continue through the production phase, though to a diminished degree.

- b) **“...full-field development of the type in the Wind Dancer project can be a barrier to elk migrations.”**

On page 3-12 of the EA, it is disclosed that “WGF data indicate habitat within the Project Area is of limited importance to individuals [elk] in the area... Estimated population counts for this herd unit [2.5 million acres, density of less than 7 per 10,000 acres] for 2002 were 1,660 individuals with a target population of 1,200.” Elk are not commonly found in the Project Area, and no migration corridor for elk has been identified in the Project Area.

- c) **“The antelope population is not in a good position to sustain additional impacts at this time.”**

Impacts to antelope are not anticipated, see EA at page 4-22.

- d) **“Given the increase of oil and gas activity from exploration to full-field density under this project, a cumulative effects analysis is required... A cumulative effects analysis is therefore absolutely imperative, and the Wind Dancer neither mentions nor provides one, in violation of NEPA... The BLM’s complete failure to take any look... at the direct and cumulative impacts of the proposed project on BLM sensitive species is indeed shocking.”**

A cumulative effects analysis is included in this EA. See Table of Contents, and the 11 pages of analysis contained in pages 4-16 through 4-26. Direct and cumulative effects to sensitive species are included throughout Chapter 4 of the EA.

- e) **“Despite the fact that BCA specifically requested that a directional drilling alternative be given detailed consideration, the BLM mentions only the Proposed Action and a No Action alternative in the EA.”**

In determining if additional alternatives were desirable or necessary, the BLM found (1) no unresolved resource conflicts necessitating a need to develop additional alternatives and (2) that BLM-mandated directional drilling is not technically nor economically feasible for this project. See page 2-20 of the EA (“Alternatives Considered But Not Analyzed in Detail”). Refer also to the “Errata” portion of this Decision Record.

- f) **“...the applicant-committed measures will not in fact minimize the potential for loss or damage to important paleontological resources.”**

A BLM geologist has reviewed the site for potential to contain important paleontological resources, and has determined that the Project Area is not likely to contain important paleontological resources.

- g) **Discussion under heading of “Groundwater Resources”**

The potential for contamination of groundwater aquifers from hydraulic fracturing is addressed on a site-specific basis in approval of APDs. The BLM and Wyoming Oil & Gas Conservation Commission ensure that APDs approved will comply with the Clean Water Act and other environmental laws, rules, and regulations. The analysis on page 4-5 discloses that the fracturing will occur at depths of between 6,000 and 13,000 feet. Additionally, the analysis discloses that the Wyoming State Engineer’s Office have data showing local stock aquifers occur at depths from near surface to 700 feet. There is no potential, then, to adversely affect other beneficial users of groundwater.

- h) **“The cumulative effects of fracing on groundwater contamination (sic) is (sic) not considered in the Wind Dancer EA.”**

See page 4-19 for cumulative effects analysis for Water Resources, i.e. “Required drilling, completion, and stimulation practices would protect aquifers from damage from wellbores or cross-contamination between aquifers. No cumulative effects are anticipated for this alternative.”

- i) **“The potential for leafy spurge invasion should be studies (sic) in detail.”**

The BLM has reviewed the project and its vicinity for infestations of noxious or undesirable weeds, as detailed in the EA (page 3-10). Leafy spurge is not present within the project area, and thus there is no potential for spread by operations within the project area. The project area does not contain habitat with high potential for leafy spurge infestation. The relative distance of the project area from known infestations of leafy spurge makes it unlikely that the existing populations will act as a seed source directly to the project area.

3. Wyoming State Geological Survey

- a) **“On p. 3-2 under Geology sec. 3.1.1-Mesaverde Group not Mesa Verde Group;...”**

See Appendix A of this Decision Record, “Errata” for this correction.

- b) **“...under Mineral Resources sec. 3.1.2-Almond, Lance, and Lewis formations and other formations within the Mesaverde Group;...”**

See Appendix A of this Decision Record, “Errata” for this correction.

- c) **“...p.3-22, sec. 3.12.2-In 2000, Sweetwater Co. ranked 5th and Carbon Co. ranked 6th in the state in the number of APDs approved by the WOGCC;...”**

See Appendix A of this Decision Record, “Errata” for this correction.

- d) **“...In 2000, Sweetwater ranked 3rd and Carbon ranked 7th in natural gas production, not the other way around as shown in the document;...”**

See Appendix A of this Decision Record, “Errata” for this correction.

- e) **“...p. A-3, under WOGCC-They also regulate drilling of wells on federal land and issue permits to drill on federal land in addition to the BLM.”**

See Appendix A of this Decision Record, “Errata” for this correction.

4. Terry Svalberg, Air Quality Specialist, Bridger-Teton National Forest

- a) **“Chapter 3, table 3.2 displays information on measured background conditions from the Brown Cow Pod EA (2003). This information differs from similar information that is displayed in the more recent EIS for Desolation Flats (2004) table 3-8... Also, table 3.2 in the EA lacks units of measure.”**

The Final EIS for Desolation Flats was finalized in the latter part of May 2004. During this period, the air quality analysis was being completed. In consultation with Susan Caplan, it was decided that the Wind Dancer EA would incorporate the analysis from Desolation Flats.

Wind Dancer Natural Gas Development Project Decision Record

Due to timing differences, the Wind Dancer EA was released with a table from the Desolation Flats Draft EIS that was changed in the Desolation Flats FEIS just prior to release. Thus, the table in Desolation Flats is correct and the table in the Wind Dancer EA, though very similar in measured quantities, is incorrect. This has been updated in Appendix A to this Decision Record ("Errata"). The precepts of the analysis for Wind Dancer remain the same and have been developed in coordination with Susan Caplan.

- b) "...emissions from this project will likely have an additive impact to nearby Class I areas on days when impacts are predicted from the Desolation Flats project."**

Upcoming far-field analyses are anticipated for South Jonah, Atlantic Rim, and Seminoe EISs, each of which will have a detailed far-field analysis which incorporates the Wind Dancer project in their calculations. Should adverse effects be detected, additional mitigation measures will be developed and implemented in consultation with Wyoming DEQ, EPA, and other BLM field offices.

- c) "The project impacts, when added to emissions from other ongoing and proposed projects, are not displayed, disclosed, or discussed anywhere in this document."**

In consultation with Susan Caplan, BLM Air Quality Specialist, it was determined that, due to the size of this project, the EA would not require a far-field analysis, but that the analysis could refer to the Desolation Flats EIS analysis. See answer for #4(b), above.

- d) "Tables 4.1 and 4.2 use different background conditions that table 3.1 as noted above. These tables also only address near field impacts, but for a much larger project. Impacts are not comparable or scalable in this manner."**

See answers for #4(a) and #4(b), above.

5. State of Wyoming, Game and Fish Department

- a) "We have no terrestrial wildlife or aquatic concerns pertaining to this project."**

Thank you for your comment.

6. Petroleum Association of Wyoming

- a) "PAW believes that all concerns have been adequately addressed and mitigated to insignificance."**

Thank you for your comment.