

Phoonswadi-Brewer, Sean

From: NPL_AR
Subject: FW: DEC-11/0063 -- Normally Pressured Lance Natural Gas Development Project -- comment memo
Attachments: DEC.11.0063 Normally Pressured Lance Natural Gas comment memo.PDF

[Julie Sharp@nps.gov](mailto:Julie.Sharp@nps.gov)

OV

05/09/2011 03:03
PMkroadife@blm.gov

To

cc

[Margaret Wilson@nps.gov](mailto:Margaret.Wilson@nps.gov),
[WASO EQD ExtRev@nps.gov](mailto:WASO_EQD_ExtRev@nps.gov),
[robert f stewart@ios.doi.gov](mailto:robert_f_stewart@ios.doi.gov)

Subject

Re: DEC-11/0063 -- Normally
 Pressured Lance Natural Gas
 Development Project -- comment memo

Hi Kellie --

It was just brought to my attention that I accidentally included comments for DEC-11/0063 for a different BLM project in that letter. Here is a revised version, with the comments from our National Trails Office removed (comments should only be from Grand Teton National Park for this project).

Sorry about the mix up!

(See attached file: DEC.11.0063 Normally Pressured Lance Natural Gas comment memo.PDF)

Thank you!
Julie

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Julie Sharp  
 Environmental Protection Assistant  
 National Park Service - Intermountain Regional Office Denver, CO ph 303.987.6705

[kroadife@blm.gov](mailto:kroadife@blm.gov)05/09/2011 02:45  
PM[Julie Sharp@nps.gov](mailto:Julie.Sharp@nps.gov)

To

cc

Subject

Re: DEC-11/0063 -- Normally  
Pressured Lance Natural Gas  
Development Project -- comment memo

Julie - just a note to let you know, I received your comments, thank you!

Kellie

(See attached file: DEC.11.0063 Normally Pressured Lance Natural Gas comment memo.PDF)



## United States Department of the Interior

NATIONAL PARK SERVICE  
 INTERMOUNTAIN REGION  
 12795 West Alameda Parkway  
 PO Box 25287  
 Denver, Colorado 80225-0287



DEC-11/0063

### Memorandum

May 9, 2011

**To:** Kellie Roadifer, Planning & Environmental Coordinator, Bureau of Land Management, Pinedale Field Office

**From:** Julie Sharp, Planning/Environmental Compliance /s/

**Subject:** National Park Service comments on the proposal for long-term development for the Normally Pressured Lance Natural Gas Development Project, Sublette County, Wyoming

Thank you for the opportunity to comment on the proposal for long-term development for the Normally Pressured Lance (NPL) Natural Gas Development Project, Sublette County, Wyoming. The National Park Service (NPS) offers the following comments in response to the above project:

#### Grand Teton National Park

##### *Wildlife*

The annual migration of the pronghorn between Jackson Hole and the Green River basin represents the longest terrestrial animal migration event in the lower 48 states; a phenomenon which is of regional and national significance. Animals that spend the summer within Grand Teton National Park (GTNP) migrate to wintering areas in the Green River basin, including some that are adjacent to the NPL project area. Radio collared pronghorn from the park have moved through the NPL project area en route to wintering grounds near Fontanelle Reservoir and areas further south towards Rock Springs. Several radio collared animals have also spent time in the project area during the winter months. Conservation of the habitats these pronghorn depend upon in the winter and their movement corridors are essential to the persistence of the park's pronghorn population. Although pronghorn are currently successful in returning to the park each year, there may be a threshold of oil and gas development and activity at which they no longer do so because of impaired habitat connectivity or population level demographic impacts related to habitat loss, fragmentation, and/or disturbance.

The status of and long-term prospects for the mule deer population living seasonally and year-round in the Green River basin, including the project area, is also of concern. Although the mule deer that reside in this area belong to the Sublette herd, some of these deer also migrate long distances and spend the summer in and around the Jackson Hole area. Recent documentation of significant population declines and lower survival rates for deer on the

Mesa where gas development is ongoing highlights the level of concern over additional development in a new area.

There is likely a limit to the amount of continued, incremental habitat loss, fragmentation, and disturbance that wildlife populations can withstand. In the interest of ensuring the persistence of the pronghorn and mule deer populations that summer in GTNP and the Jackson Hole area, the park would like the upcoming Environmental Impact Statement (EIS) to consider identifying thresholds at which impacts to ungulate populations are significant and use these to predict potential impacts and guide development of alternatives that minimize such impacts. Given the amount of research previously conducted in the area, as well as that which is ongoing, identification of threshold levels for well pad densities and roads and other linear features should be feasible. The park also suggests that limits on the amount of disturbance in addition to those on timing and development be considered in the development of the full range of alternatives. As well, we would like to see the EIS address the issues of habitat fragmentation and the affects of development on habitat connectivity, impacts to ungulate migratory movements, impacts to crucial seasonal ranges for ungulates, cumulative impacts, and the persistence of pronghorn in GTNP and the Jackson Hole area.

The park recommends that impacts to the greater sage-grouse, including cumulative impacts, be analyzed. Although this project will not impact the park's grouse population, it may affect the greater sage-grouse population regionally. Project impacts may cause further loss of grouse habitat and future declines in the population. As a result, conservation actions should be taken within sage-grouse habitat and guidelines outline by the WYG&FD should be followed.

#### *Water Quantity and Quality*

The NPS would like to see a detailed analysis of the water quantity estimates, sources, and water transmission methods used in exploration and production. Test wells in the Pinedale area already have elevated levels of hydrocarbons. There is the potential for these hydrocarbons to migrate into drinking water wells and surficial aquifers. Water quantity and quality should be looked at cumulatively with all other current and proposed gas and oil exploration and production in the area and its potential effects on ecosystem health and the local community's quantity and quality of domestic water.

#### *Air Quality*

Clean air is a fundamental resource of the park and visitors place a high value upon unimpaired views of the spectacular Teton Range. Air pollutants are transported long distances and can affect the park through visibility reduction, biological and human health effects, and degradation of historic properties. The NPS has concerns regarding the effects of the project on the air quality in Grand Teton National Park, a designated Class I Airshed. The Clean Air Act tolerates no degradation of visibility in Class 1 Airsheds; therefore, this should be analyzed thoroughly in the EIS.

Included in the air quality analysis, the BLM should examine the impacts of atmospheric deposition on sensitive lakes within the wilderness areas and the parks. Nitrogen and sulfur deposition are causes of concern for sensitive lakes in the national parks in northwest Wyoming. In Grand Teton National Park several lakes, particularly Delta, Surprise, Amphitheater, Mica and Lake Solitude have all been identified as being acid sensitive and should be included in the analysis.

In general, the NPS has concerns regarding local air quality due to the cumulative emissions from all the oil and gas development activities in adjacent counties: drilling, production, storage, transport, and treating. Ozone is a problem of increasing magnitude in western Wyoming with recent exceedances of National Ambient Air Quality Standard (NAAQS) for ozone recorded. At a minimum the analysis should include the effects of emissions from current and future drilling to ozone levels in Grand Teton National Park.

We appreciate the opportunity to provide comments on the proposal for long-term development for the Normally Pressured Lance Natural Gas Development Project, Sublette County, Wyoming. For questions regarding comments from Grand Teton National Park, please contact Mary Gibson Scott, Superintendent, at 307-739-3410.

cc:

NPS-WASO, Environmental Quality Division  
NPS-Grand Teton National Park, Margaret Wilson  
DOI-OEPC, Robert F. Stewart