

Phoonswadi-Brewer, Sean

From: NPL_AR
Subject: NPL Comments

Michelle Smith
 <perennial6@hotmail.com>

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 PM

<npl_eis_wy@blm.gov>

NPL Comments

To

cc

Subject

Require that Encana require subcontractors, etc. adhere to best management practices and be held to the same regulations, requirements, spill reporting, etc. that Encana will be. And prove it. This is especially important for drivers who speed or run over wildlife. At posted speed limits in the fields, no wildlife should be getting hit. NO littering! There should be consequences!

Establish baselines and how to measure changes, start monitoring and plan for adjustments before permitting this project. The Pinedale Anticline still doesn't have a final groundwater monitoring plan and the baseline for mule deer is a joke. Please complete these kinds of steps - not just for water and wildlife but for air, etc. - before approving the project so that the public knows what it is dealing with and what will be done.

If you use adaptive management, define it according to how it will actually be implemented. Don't let it be an ambiguous catch-phrase.

Have any wildlife threshold triggers reviewed by the UW Co-op before being put in the Record of Decision. Lack of prior review - and too much operator input - made the PAPA wildlife matrix a mess.

Establish actual, concrete steps for mitigation that will occur immediately when a trigger is hit. Don't use a general 1, 2, 3 step process that allows for wide open interpretation and no set deadline.

Use oak mats for well pads to reduce impacts to vegetation and wildlife.

Do not establish another interagency project office. Actual monitoring and mitigation can be conducted by the BLM in cooperation with other agencies without housing another office. If Encana wants to donate money for monitoring and mitigation, have the money fund BLM positions dedicated to the NPL. Or Encana can commit to a certain dollar amount each year and hire contractors to do special projects as determined by the BLM or other agencies.

Make Encana justify future locations of wellpads now. Even though much of this is determined by the success of wells, Encana should know the general development schedule and locations. Review future road arteries and try to plan so that one road can service many wells pads rather than making new ones for every well pad. Isn't it better to have one winding road from pad to pad rather than several main roads with a spiderweb of secondary access roads?

Exceptions should be a rarity. Encana should know what it's doing pretty solidly for at least three to six months and should be able to plan around wildlife. The BLM is obligated by law to facilitate development but not to ensure that developers make the maximum profit by going gangbusters in the field.

Be realistic about how development actually happens. The Pinedale Anticline Record of Decision's "once on a pad, stay on a pad" is only applicable in certain situations. Define terms and expectations explicitly. The BLM's interpretation of certain development steps is different than the operators. Figure out what EXACTLY will be allowed when and how and make sure the agencies and Encana are on the same page.

Air quality stations should be controlled entirely by the DEQ. Even if Encana funds these monitoring stations, it should have NO input on their location.

Ambiguous phrases in the Record of Decision such as "as soon as possible" and "in consultation with" should be avoided. Deadlines should be set and the role of cooperating agencies clearly defined. If they are consulting, what exactly are they consulting on and how? What result is expected from them, how and when? From the entire consultation?

Streamline what's reported, how and to whom by Encana. There's a lot of redundant information and requirements for operators. Establish systems/protocols for reporting before the reports are due, possibly before the Record of Decision is even signed.

The NPL should be remote monitored and facilities (dehydrators, compressors, tanks, etc.) should be co-located to reduce or eliminate human disturbance. Use LGS!

Solar and/or wind power should be used field-wide as much as feasible. Not what is cheapest but what is possible and has the best overall benefits!
Reduce overhead powerlines.

Record of Decision should be spare in language and direct in idea. Use bullet points, tables, charts, etc. rather than text that is open to interpretation.

The BLM is ultimately responsible for what happens in the NPL; it should only use cooperating agencies as consultants and advisors, which is the requirement and intent of NEPA, rather than allowing them to dictate terms and conditions.

NO YEAR-ROUND DRILLING!!!