

Phoonswadi-Brewer, Sean

From: NPL_AR
Subject: NPL Comments - WWF
Attachments: NPL_Comments_WWF_5.2011.doc

joybannon@wyoming
wildlife.org

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AM

[NPL EIS WY@blm.gov](mailto:NPL_EIS_WY@blm.gov)

To

cc

Subject

NPL Comments - WWF

Dear Ms. Roadifer:

Please accept Wyoming Wildlife Federation comments on the Normally Pressured Lance project. If you have any questions or would like to discuss our comments in greater detail, please don't hesitate to contact me.

Sincerely,

Joy Bannon
 Field Director
 Wyoming Wildlife Federation
 P.O. Box 1312
 Lander, WY 82520
joybannon@wyomingwildlife.org (See attached file:
 NPL_Comments_WWF_5.2011.doc)



PO Box 1312
 309 Main Street, Suite A
 Lander, WY 82520
 307-335-8633 • Fax: 307-335-8690
www.wyomingwildlife.org

May 4, 2011

Kellie Roadifer, Project Manager
 NPL Natural Gas Development Project
 BLM Pinedale Field Office
 1625 West Pine Street
 P.O. Box 768
 Pinedale, WY 82941
NPL_EIS_WY@blm.gov

Re: Comments on the NPL Natural Gas Development Project

Dear Ms. Roadifer:

Please accept the following comments from the Wyoming Wildlife Federation on the Normally Pressured Lance (NPL) Natural Gas Development Project proposed by Encana. This project is asking for 3,500 natural gas wells on 141,000 acres to be drilled west and south of the Jonah Field at a rate of about 350 wells per year over 10 years.

The Wyoming Wildlife Federation (WWF), established in 1937 and with current standing membership of over 5,000, is Wyoming's oldest and largest statewide conservation organization. Our mission is to work for hunters, anglers and other wildlife enthusiasts to protect and enhance habitat, to perpetuate quality hunting and fishing, to protect citizens' rights to use public lands and waters, and to promote ethical hunting and fishing.

Our comments will focus on wildlife, ground and surface water, and recreation. This project includes many wells, rigs, associated infrastructure, and an increase of human activity. Increased disturbance in a landscape results in elevated negative pressure on other multiple uses.

Wildlife

The two prevalent wildlife species within the area are Pronghorn and Greater sage grouse. The 2006 Wyoming Game and Fish Department (WGFD) maps do not include mule deer or elk. However, Reardon Draw and Chapel Canyon can identify potential big game use. Other developments in the area (i.e. Pinedale Anticline, Cimarex Helium Plant, LaBarge Infill Project) may be relocating wildlife species to habitats within the proposed project area.

Encana and the BLM should coordinate with WGFD to utilize recommendations, including the 2010 WGFD Recommendations for Development of Oil and Gas Resources

within Important Wildlife Habitats, in evaluating the impacts associated with this project. According to WGFD 2006 data, five Pronghorn migration routes exist along with summer, spring, and fall habitat. A small portion in the southeast corner contains year-long winter range. This development would increase the bottleneck strain already present for the pronghorn herd. Avoidance of negative impacts like development within migration corridors and stopover points including roads, well pads and support facilities, is essential. The ability to move freely between seasonal habitats is crucial to the long-term health and survival of big game. Berger et al. 2006 and 2004 provides data that shows Pronghorn are especially vulnerable to energy development located within migration corridors.

The Greater sage grouse is listed as a candidate species under the United States Fish and Wildlife Service (USFWS) and sensitive by the Bureau of Land Management (BLM). This species resides in the proposed project area and is part of Wyoming's core habitat area. As a BLM sensitive species, also known as a candidate species, the BLM Manual 6840.12 requires the agency to implement management plans that conserve candidate species and their habitats to ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for the species to become listed. In accordance with BLM Manual 6840, the Greater sage grouse is to be managed "to promote their conservation and to minimize the need for listing under the Endangered Species Act. It is imperative that fragmentation and degradation...not continue to the point that sustainable sage-grouse populations can no longer be supported." (US Dept. of Interior, March 5, 2010, Instruction Memorandum No. 2010-071).

As the BLM develops the draft and final EIS, the BLM needs to identify the impacts from increased human activity to wildlife. Increased human activity elevates the potential for wildlife harassment, poaching, or vehicle collisions. Traffic should be required to travel at low speeds and all trucks need to be washed daily to prevent the spread of invasive species.

Additional Wildlife Recommendations:

- Identify how Encana will protect big game habitat and migration corridors.
- Work with Wyoming Department of Transportation to create over or under passes that wildlife can use to migrate safely through Highway 191, Highway 189 and Highway 351. This is an extremely important step in reducing vehicle collisions (both a human and wildlife safety concern) and bottleneck issues the pronghorn herd is confronted with.
- Acknowledge in the draft and final EIS habitat fragmentation impacts and attempt to quantify them.
- Incorporate the most current and relevant scientific data that analyzes wildlife impacts related to mineral extraction development and production.
- Establish an action plan for the potential loss of existing pronghorn migration corridors.
- Provide an environmental compliance plan that clearly states how the BLM will enforce monitoring, environmental compliance and remediation on wildlife affected

by oil and gas developing in the project area. This plan should be developed on a landscape scale level to determine management options for wildlife species.

- Avoid migration corridors, leks, brooding grounds, and stop over points when determining where to place well pads, roads, and support infrastructure. Animal displacement is a real possibility when developing 3,500 wells within big game and Greater sage grouse habitat.
- Review and include as appropriate the Interior Board of Land Appeals decision in *William P. Maycock 177 IBLA 1* (March 16, 2009).
- Conduct inventories of wildlife habitat and species to determine baseline data prior to development.
- Identify thresholds for wildlife populations and map out mitigation measures.
- Provide a thorough research inventory on the latest impacts to wildlife from oil and gas development.
- Avoiding wildlife hot spots, such as migration corridors and stopover points.
- Overpasses and underpasses for pronghorn to migrate with more ease are warranted.
- Provide a cumulative effects scenario that illustrates what may occur to species that are impacted from this proposed development and from the other existing and projected developments.
- Develop a landscape scale cumulative impacts analysis that addresses the development within and outside of the proposed project area. In creating this analysis, the BLM should use the most up-to-date big game seasonal range designation maps that the WGFD will provide.
- Identify significant migration corridors with modeling of scenarios that may occur should migration corridors be fragmented or lost.
- Control invasive plant species.
- Present an analysis of the development plan with seasonal timing restrictions as they apply to all wildlife species.
- Develop a mitigation plan that includes the proponent's ability to fund wildlife studies and contribute to a wildlife mitigation fund.
- Evaluate habitat competition among various wildlife species when habitat loss and fragmentation occurs.
- Establish thresholds for wildlife impacts that will include indicators, a policy to mitigate or curb the impacts, and prevention methods to maintain population numbers.
- Develop action plans for monitoring, addressing thresholds, and mitigation.
- The associated infrastructure and road system will need to be clearly defined in the EIS with a travel management plan included.

Water

Alkali Creek and Granite Wash off the Green River along with many smaller streams are within the proposed project area. The 3,500 wells proposed and its associated infrastructure will disturb vegetation and soils; therefore, water quality, quantity, and riparian condition need to be addressed in the EIS. The surface disturbing activities that take place in the production of natural gas cause nutrient and sediment loading in streams

resulting in turbid, warmer water. The flow of the stream also changes, which can lead to erosion and fewer areas for spawning fish.

Spills of oil, gas, salt water or any other noxious substance pose risks to the quality of the surface and ground water. A straightforward response plan needs to be developed and safeguards established to mitigate the potential for spills. Any water wells in the area need to have baseline studies conducted prior to development of the first well and monitoring through water sampling should ensue.

Produced water will also need to be addressed. A number of wells in the region produce highly mineralized and saline water (*see* i.e. Wyoming Oil and Gas Commission water quality data for Jonah Field, WOGCC website). A typical well completion involves approximately 25,000 barrels of water. Already, critical contamination issues are being observed in the Pinedale Anticline area, northeast of the proposed project. During routine surveys, 88 wells out of 230 wells were discovered to be contaminated with benzene, a highly toxic chemical (DEQ 2008; EPA 2008). Highly mineralized water produced in significant quantity and released to adjacent small surface watercourses and streams will result in significant changes to water quality characteristics and related aquatic and riparian biological resources.

Additional Water Recommendations:

- Provide details in the EIS on how Encana will handle produced water.
- Use the state-of-the-art technology to protect and monitor groundwater in the proposed project area.
- Predict the level of vegetation and surface disturbance to mitigate stream impacts and then identify what those impacts will be. Also identify what measures will be taken to prevent ground and surface water pollution.
- Assert best management practices to control surface runoff and protect natural drainages.
- Coordinate with Wyoming Department of Environmental Quality.
- Provide a detailed description of the subsurface hydrology with characterization of the aquifers that could be affected.
- Identify the differing geological formations and provide quantitative descriptions of the geohydrological characteristics of each formation.
- Identify water users who depend upon groundwater resources and provide mitigation measures.
- Provide a thorough analysis of surface and subsurface hydrologic conditions and produced water with a full discussion of produced water disposal, including treatment, re-injection, evaporation and discharge.
- Analyze the impact of well development activities. Address frac'ing, the use of drilling muds and injection of other substances, penetration of aquifers and aquitards and related potential inter-aquifer communication.
- Complete a thorough and updated baseline water quality study of streams and aquifers.
- Establish a well monitoring protocol for spill detection.
- Provide a full discussion of potential contamination issues.

- Conduct a thorough and updated analysis on all stream and drainage crossings of pipelines, roads, improved access areas, staging areas, and water disposal facilities.
- Define specific mitigations measures that the BLM will use to limit and prevent impacts to the hydrological systems.
- Discuss the water demand associated with the exploratory drilling, production activities, and the source of water anticipated to supply the demand. Analysis the impact on affected water users.

Recreation

Hunting and wildlife watching are economically important for Wyoming. Over 50 million U.S. citizens hunt and fish, according to data from state game and fish agencies. In 2006, 87 million Americans enjoyed some variety of recreational outdoor activity relating to fish and wildlife. In Wyoming, during 2006 more than 320,000 people participated in fishing and hunting. One of the fastest growing outdoor activities is wildlife watching and according to a US Fish and Wildlife Service survey, 716,000 people participated in some variety of this (USFWS 2006 National Survey of Fishing, Hunting, and Wildlife Associated Recreation). The total of hunting and fishing recreation days in Wyoming in 2008 was 3,683,371. Based on the number of recreation days and average expenditure per day, hunters, anglers and trappers expended approximately \$685 million in pursuit of their sport (WGFD Annual Report 2008). The WGFD 2008 Annual Report also reports that non-consumptive users provided about \$420 million wildlife watching, taking photographs, and hiking. In total over \$1 billion dollars was spent in Wyoming in 2008 by outdoor enthusiasts.

In 2008, Sportsmen for Responsible Energy Development conducted a survey called Sportsmen's Opinions on Oil and Gas Extraction Activities in the Rocky Mountain West, of sportsmen's opinions regarding oil and gas extraction on public lands. The survey concluded that the prominent concerns for Wyoming public lands are, "... increased poaching, the loss of access to hunting and fishing areas, decreased fish/wildlife populations, less fish/wildlife habitat, off-road vehicles, and increased water and air pollution."

The NPL proposed project is entirely within pronghorn hunt area 90. Over 1,000 pronghorn licenses are sold annually for this hunt area, which means many sportsmen and woman, and their families will be subject to reduced hunting conditions if this project moves forward. Coordinate with the WGFD as much as possible.

Additional Recreation Recommendations:

- Evaluate how the 3,500 wells of disturbance will impact the hunting opportunities the area currently affords.
- Provide opportunities for dispersed recreation uses in the area that are consistent with riparian and fisheries management objectives.
- Allow the recreation user the opportunity to have a high degree of interaction with the natural environment to have moderate challenge and to use outdoor skills.
- Coordinate with the WGFD routinely.

- Evaluate the loss of hunting and fishing opportunities because of this development.
- Research the state of Wyoming's Department of Tourism data to consider the implications for loss of that economy.

General

Because the NPL overlaps both the Pinedale RMP and the Rock Springs RMP, the BLM needs to identify which RMP will guide activity, disturbance, reclamation, mitigation, and monitoring.

Conclusion

The proposed NPL project is large in number of wells and acreage. Pronghorn and Greater sage grouse habitat will need to be considered with great care when determining well pad and support facility locations. Produced water is another component that will need to be analyzed and discussed at length within the draft and final EIS. And finally, loss of recreation opportunities is a factor to consider with this project. Evaluate and describe how these opportunities will be altered and how the BLM will deal with those changes.

Thank you for considering our comments. Wyoming Wildlife Federation is available to discuss these comments further.

Sincerely,

Joy Bannon
Field Director
P.O. Box 1312
Lander, WY 82520
joybannon@wyomingwildlife.org
307.335.8633

Literature Cited

- Berger, J. 2004. The last mile: how to sustain long-distance migration in mammals. *Conservation Biology*. 18:320-331.
- Berger, J., K. Berger and J. Beckman. 2006a. *Wildlife and Energy Development: Pronghorn of the Upper Green River Basin – Year 1 Summary*. The Wildlife Conservation Society. Jackson, Wyoming.
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