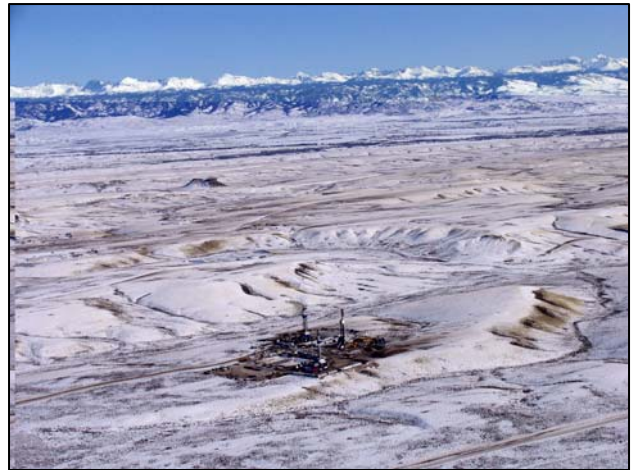


Upper Green River Valley Coalition

Position Paper on Draft Pinedale Resource Management Plan *Comments due June 18 on BLM's Draft Environmental Impact Statement*

Release of a draft management plan for Wyoming's Upper Green River Valley marks an important turning point for the future of this biologically crucial corner of the Greater Yellowstone Ecosystem. This is a place where world-class wildlife resources overlap large reserves of natural gas that are being drilled at a rampant pace. Since the drilling boom began here eight years ago, daily haze has obscured the valley's once pristine vistas, wintering wildlife has declined and Pinedale's quality of life and community services have suffered greatly. So revision of the BLM's "Pinedale Resource Management Plan" (RMP) offers the opportunity to change course and chart a more balanced approach to energy development.

The final version of the Pinedale RMP will guide oil and gas development on 1.2 million acres of federal mineral estate located under sagebrush-covered high desert administered by the Bureau of Land Management (BLM). The agency's "preferred alternative" in the draft RMP envisions more than 7,836 new wells on federal estate over the next 10 to 15 years (which would almost triple the number currently in place), opens to development swaths of biologically important big game habitat, and results in further declines in already degraded air quality. While the BLM's preferred plan includes some positive components, it also contains problematic loopholes and it overall fails to provide measures and protections needed to preserve the valley's non-energy values.



The Upper Green River Valley Coalition, a grass roots organization of ranchers, conservationists, business owners and citizens based in Pinedale, generally endorses Alternative 3 as a starting point for a scientifically defensible and true multiple-use alternative. With some changes, it could establish a reasonable balance between energy extraction and the many other resources the valley is justly famous for. We encourage the public to submit comments before the June 18 deadline, urging the BLM to adopt a new Pinedale RMP that:

- Paces development, including not allowing new major gas fields to be developed until development in existing and expanding fields has been completed;
- Preserves and enforces seasonal drilling stipulations that protect wildlife, and strengthen those shown to be deficient (especially greater buffer distance around sage grouse leks);
- Withdraws important wildlife and scenic areas from future oil and gas leasing availability, including all of the Wind River Front and greater Trappers Point area, the Ryegrass/Cottonwood area, the Fontenelle elk winter range, and the upper Green area north of Warren Bridge;
- Mandates the clustering of new infrastructure and the use of directional drilling to minimize industry's footprint on the ground;
- Removes loopholes that allow areas designated for minimal development to become intensively developed and allow surface drilling in No Surface Occupancy (NSO) areas;
- Requires use of the cleanest technologies and environmentally protective practices.

Background: The Valley and What Is At Stake:

Bounded by the Wind River, Gros Ventre and Wyoming ranges, the Upper Green River Valley harbors crucial winter range for some of the largest concentrations of big game in the West. More than 100,000 mule deer, pronghorn, moose and elk congregate here every winter to survive on the forage growing on the sagebrush steppes and mesas and the valley bottoms laced with willow and cottonwoods. The valley represents the largest block of publicly owned winter wildlife habitat in the 17-million acre Greater Yellowstone Ecosystem. It also features the southern half of the longest wildlife migration corridor in the Lower 48, used by pronghorn that travel up to 160 miles between Grand Teton National Park and winter range as far south as the Red Desert.

Energy development thoroughly dominates parts of this region with more than 3,000 wells in place. Much of the Valley is today under threat of development with more than 70 percent of BLM's Pinedale Resource Area already under lease. Recent drilling activity is focused on two gas fields to the south and west of Pinedale. The Pinedale Anticline and the Jonah are among the nation's most productive and profitable fields. Together these fields produced nearly 600 billion cubic feet of natural gas last year (2.5 percent of national production) worth \$4 to 5 billion. Industry predicts huge returns on its investments here, particularly in the Pinedale Anticline, where the BLM is considering approval of 4,400 new wells in the heart of crucial winter range.

How the BLM's Draft Resource Management Plan Falls Short:

The Draft EIS presents four alternatives. Alternative 1 is the no-action alternative that would leave in place the current plan, adopted in 1988, long before the region became an oil and gas hotspot. Alternative 2 caters exclusively to industry's needs and would likely lead to the wholesale sacrifice of the valley to energy extraction. That leaves Alternative 3, one tailored toward a conservation vision, and Alternative 4, BLM's preferred vision.

While the draft RMP acknowledges the harm drilling and associated activities have already inflicted on mule deer, sage grouse and other treasured wildlife species, the agency's preferred alternative would dramatically increase development. BLM's draft plan also lacks crucial details on necessary monitoring and mitigation that could ensure the health of the region's world-class wildlife, clean air and quality of life. For example, the BLM's preferred alternative would:

- Allow leasing for surface development to continue on at least 70 percent, or 850,000 acres, of the resource area. This could subject to development thousands of acres of big game crucial winter range, calving and fawning areas and migration routes.
- Provide loopholes that would allow development on "No Surface Occupancy" restricted lands. Also, nominally designated "minimal intensity development" and NSO areas could be re-designated "Intensively Developed Fields" if well densities reach one well per 160 acres
- Relax wildlife protections in areas proven to contain valuable reserves of gas. The emphasis in these areas is "on efficient and complete development and production" of oil and gas.
- Implement a "performance-based" management approach, despite the fact that BLM has demonstrated with its "Pinedale Anticline Working Group" (PAWG) that it is ill-prepared and unwilling to fully implement "adaptive management."
- Defer establishment of monitoring and mitigation plans to an undefined future time. Since it fails to provide details on funding, personnel, timelines and measurements, the proposed "performance-based" approach is unlikely to ensure meaningful accountability to the public.
- Result in annual emissions of air pollutions topping 120,000 tons a year, nearly quadruple 2001 levels. (DEIS Vol. II, Appendix 19, page A19-27)
- Establish only four "areas of critical environmental concern" (ACECs) covering just 1.5 percent, or 14,530 acres, of the resource area, despite the availability of up to nine potential ACECs covering several hundred thousand acres.

Comparison of Key Alternatives:

Under each alternative, the BLM assigns its acreage in the Pinedale Resource Area to one of four different development levels or approaches which would determine where future leasing could occur and under what restrictions: unavailable; large block NSO (meaning the leasehold can only be accessed from an off-site location through directional drilling); minimally developed; and intensely developed. The agency's preferred Alternative 4, for example, would make 13 percent of the resource area unavailable, 17 percent NSO, 56 percent minimally developed, and 15 percent intensively developed.

	<u>Alternative 3</u>	<u>Alternative 4</u>
Intensively developed	78,070 acres	175,750 acres
Minimally developed	498,790 acres (including NSO)	672,470 acres
No Surface Occupancy	(combined with above)	205,100 acres
Unavailable for leasing	606,500 acres	156,900 acres
% of Resource Area in NSO or unavailable for future leasing	51 percent	30 percent
New wells on federal mineral estate (DEIS, page 2-245 & 2-246)	6,074	7,836
Acres short-term disturbance	31,139	42,180
Acres long-term disturbance	13,325	17,330
NOx emissions (tons/year)	18,877	23,170
Estimated natural gas production (BCF over 20 years)	16,730	19,168

Clearly, Alternative 3 allows ample room for development (including recovery of over 87 percent of the total production estimated in Alternative 4), while protecting the multiple-use character of at least half the 1.2-million-acre resource area. But while Alternative 3 makes 51 percent of the Resource Area unavailable or available only as NSO, these restrictions would apply only to new leasing; existing leases would be unaffected. So, with more than 70 percent of the Resource Area already leased, Alternative Three's immediate effect would be far less than these numbers suggest. While the BLM recognizes the need to concentrate development to avoid fragmenting habitat in a way that renders it useless to wildlife, its preferred alternative would protect at most just 30 percent of the Resource Area and fail to confine industrial activity to already developed areas.

Key Recommendations

Safeguard the Air: Instead of merely asking industry to use low-emission drill rigs (which are not always available), the BLM must mandate their use and set stringent emission caps. If these caps are breached, industry must be required to scale back its activities. The only sure-fire way to reduce emissions is to ease the pace of development. Also, BLM must implement a coordinated and thorough monitoring program that would provide a comprehensive picture of the quality of the Upper Green's air with an eye toward determining how energy development affects it.

Quality of Life: Slowing development would have the added benefit of softening the boom's social and economic disturbance to Sublette County's communities, which have become stressed by illegal drugs, heavy truck traffic, overstretched social services and inadequate infrastructure. The rapid influx of workers has undermined the stability of Pinedale's once-quiet community and rural pace of life. The RMP must make an honest assessment of the boom's toll on Sublette County in terms of lost economic diversity, degraded quality of life, impacts to municipal governments and rising crime.

Wildlife: The draft RMP recognizes the crucial role the Upper Green’s winter range, migration routes and calving areas play in the health of the region’s big game herds, while also admitting that further gas development will harm wildlife by reducing usable habitat. For example, while the preferred alternative wisely calls for setting aside 4,160 acres around Trappers Point as an Area of Critical Environmental Concern (ACEC), it would leave vulnerable to development nearby crucial lands, such as the headwaters of the Upper Green River, Cora Butte, the northern Wind River Front, and the CCC Ponds. The BLM should reconsider all nine areas, covering several hundred thousand acres, initially proposed for ACEC designation. Alternative 3 does a much better job in this regard, designating as ACECs eight areas totaling more than 80,000 acres. Besides setting aside sensitive wildlife areas, seasonal drilling stipulations need to be maintained and strengthened and the provisions on granting exemptions to stipulations tightened. BLM should also set thresholds for wildlife impacts that would trigger development slowdowns or further restrictions.

Too Many Loopholes: While BLM is taking a positive step by identifying some areas that should be protected from development, all of the alternatives in BLM’s draft plan include disturbing loopholes that could undermine these protections. For example the agency could waive surface protections under certain conditions, such as NSO restricted areas being drained by neighboring wells. And “minimally developed” areas with standard mitigation measures imposed could be converted to areas of intensive development where year-round drilling everywhere and virtually no restrictions are imposed on the level and pace of development. It may appear that BLM intends to limit development for parts of the Upper Green, but in reality these sensitive lands could easily become as heavily developed as the Jonah and Pinedale Anticline fields.

Explicitly Define Monitoring and Mitigation Approach: The BLM’s preference for so-called “performance-based management” gives no indication of when a “performance” would be deemed successful—not now, or 75 years from now. The agency is on record refusing to use tools available to prevent the loss of half the Pinedale Anticline mule deer herds. We urge the BLM to include specifics on management objectives, intended outcomes, measures of success, monitoring timeframes, costs and funding mechanisms, personnel needs, and mitigation triggers with clear consequences should an objective fail to be met. Also, the RMP should describe how progress will be documented and reported to various stakeholders, including the American public.

Conclusion: There is a Better Way

The RMP revision offers a great opportunity to restore a true multiple-use approach to public lands in the Upper Green River Valley. Alternative 3 in the BLM’s Draft RMP suggests that development should be excluded from some sensitive lands, providing needed areas of protection between the Valley’s three majestic mountain ranges. With some improvements—such as wildlife thresholds, mandates for using the cleanest technology and practices, and elimination of loopholes—Alternative 3 could ensure the valley is developed more responsibly. A sound RMP would not only ensure we “do it right” in the Upper Green, but also would serve as a model of a more balanced approach for the BLM’s other oil and gas hotspots around the West.

Take a Stand -- Send Comments by June 18!

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