

# Upper Green River Valley Coalition

## Fact Versus Fiction

### *What the Pinedale Anticline SEIS really means*

In December 2006, the Bureau of Land Management released a draft Supplemental Environmental Impact Statement (SEIS) on industry's proposal to escalate drilling in the Pinedale Anticline project area. The new proposal calls for 4,399 more wells, almost nine times the number currently in place, drilled at a rate of up to 232 wells per year. The project comes on top of the recent approval of an infill project in the neighboring Jonah Field that will allow an additional 3,100 wells. Taken together, the scale and pace of these projects could forever alter Sublette County's air quality, its ability to support abundant wildlife, and its quality of life—all the things that make Wyoming's Upper Green River Valley a great place to live and visit.

**1) CLAIM:** *This plan reduces the development footprint on the Anticline and results in less disturbance than what would occur if drilling continued under guidelines adopted for the Anticline in 2000.*

**FACT:** **Approval of the SEIS will result in slightly fewer well pads than were allowed in the 2000 plan but more wells and more disturbed acreage.** At this time, there are 662 wells located on 348 pads operating on the Anticline. The 2000 Pinedale Anticline drilling plan allows for a total of 700 producing wells and/or 900 well pads. The most recent proposal calls for 4,399 more wells and 250 additional pads for a total of approximately 600 well pads, only 100 fewer than now approved. On paper this looks like a slight improvement, but what they don't tell you is that the well pads on the Anticline now are only five and a half acres in size while the pads allowed under the proposed SEIS will be up to 20 to 25 acres in size—four to five times larger. So in reality the footprint is going to more than double in size in spite of a reduction in the total number of well pads. (From 5,049 acres of surface disturbance to 12,278 acres.)

**2) CLAIM:** *Development will be concentrated in the core development area (the central spine of the project area), assuring sufficient undisturbed wildlife habitat in the rest of project area.*

**FACT:** **In reality, the BLM places no firm restrictions requiring that drilling be concentrated in the core area, and operators cannot guarantee this.** The idea of concentrating development along the crest of the Anticline is a good one if the peripheral areas are left alone to provide habitat for displaced wildlife. However, as now written, the SEIS only suggests that such concentration takes place. There are no enforcement guidelines established in the document. The BLM must use lease suspensions and other methods to limit development to the central development area, where the agency indicates the highest natural gas potential occurs.

**3) CLAIM:** *This plan will allow operators to finish drilling more quickly.*

**FACT:** **“More quickly” still means 15-20 years of development** and reclamation in high desert, sagebrush steppe such as that in the Upper Green River Valley has had limited success. As we all know, you can still see tracks from pioneer wagons along the Lander Trail more than 150 years after their passage. This ecosystem is fragile and plants like sagebrush grow back slowly, so the idea that a mad rush to develop the field quickly will lesson impacts is absurd. Moreover, 20 years is an eternity for the wildlife displaced by development. We believe a much wiser approach is to stagger or stage development over time. This would spread out the economic benefits, provide wildlife with undeveloped areas as sanctuaries, and reduce the negative impacts to Sublette County's air and quality of life.

(over)

**4) CLAIM: Air quality impacts will be mitigated and the massive air pollution emissions that will result from the 4,399-well Pinedale Anticline infill will be minimized.**

**FACT: Natural gas development on the Anticline is already causing significant impacts to Sublette County's air quality and additional drilling will compound the negative effects.** In 2005, air pollution from the Pinedale Anticline project was estimated to have caused 45 days of significant haze in the Bridger Wilderness Area of the Wind River Mountains and 55 days of significant haze in Pinedale. Under the new proposal, it is estimated there will be 67 days of significant haze in the wilderness and 91 days of haze in Pinedale. These numbers go up to 77 and 96 respectively when coupled with other regional emission sources. Other impacts from the proposed 4,400-well infill include predicted exceedances of the legal limit for nitrogen dioxide pollution that were established to prevent significant deterioration of air quality in this area. In the face of these severe problems, BLM *specifies nothing* in the way of concrete, binding mitigation measures. At most it would pursue certain reductions in emissions but it provides no binding requirements whatsoever for how these reductions will be achieved. To make a real difference, the BLM must mandate the comprehensive use of cleaner technologies and limit the pace of development to keep annual emissions at a lower level that will preserve clear views and not harm sensitive residents, such as the elderly, those with respiratory problems, and young children.

**JUST THE FACTS:**

- This project proposes more than twice the current level of habitat disturbance in one of our most important wildlife winter ranges.
- This proposal contains no guarantees that allow our Wyoming wildlife any undisturbed place to go on the shoulders of the Anticline.
- Local big game and sage grouse populations have already been negatively affected by the current drilling, according to BLM and industry funded multi-year studies. Yet, there are no guarantees with this proposal that drilling restrictions would be imposed if further impacts result from this project.
- This proposal *does* guarantee twice as much pollution in the Wind River Mountains and extra, airborne dangers to human health in the valley.

**SUMMARY:**

The Pinedale Anticline SEIS calls for a massive increase in development that promises to result in significant negative impacts to Sublette County. We believe these impacts could be minimized if the following measures are implemented:

- Development is concentrated along the crest of the Anticline.
- Thresholds that define a "bottom line" or "safety net" for wildlife are adopted. If triggered, these would stipulate immediate changes to the pace and level of Anticline development.
- Development is staged over time and space to reduce impacts to wildlife, air and local communities.
- Strict guidelines for lessening pollution emissions are enforced.

**FOR MORE INFORMATION:**

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