

Upper Green River Valley Coalition

Position Paper on Proposed Escalation of Anticline Gas Field

(Comments on Pinedale Anticline Draft Supplemental Environmental Impact Statement)

In December 2006, the Bureau of Land Management released a draft Supplemental Environmental Impact Statement (SEIS) on industry's proposal for year-round and expanded drilling in the Pinedale Anticline project area. The proposal calls for 4,400 more wells, almost nine times the number currently in place, likely drilled at a rate of up to 232 wells per year, and expanding the impacts beyond those authorized originally by the BLM in 2000. Well-established, seasonal drilling stipulations designed to protect big game and sage grouse, would be removed. Coupled with the recently approved infill project on the neighboring Jonah Field (3,100 wells), ramped-up drilling in the Pinedale Anticline could forever alter Sublette County's quality of life, air quality and ability to support abundant wildlife—all the things that make Wyoming's Upper Green River Valley a great place to live and visit.

'Do it Smarter' and Don't Sacrifice the Valley for Energy:

The Upper Green River Valley Coalition supports several of the components included by the Pinedale Anticline operators (principally Ultra, Shell, and Questar) to reduce surface disturbance (i.e. substantial directional drilling, workforce bussing, water/condensate pipelines, consolidated infrastructure, etc). These provisions alone, however, are insufficient and it is critical that this project be amended to set aside areas for wildlife, which the plan currently fails to do. That is, the lower-gas-potential periphery of the project area must be explicitly closed to new development until industry's "core development area" has been fully developed and reclaimed. Also, we believe the proposed multi-year abandonment of winter drilling protections is an unprecedented move that poses excessive risks to Wyoming's wildlife. Since evidence is mounting from a number of industry-funded studies that oil and gas activity is harming the Valley's sage grouse, mule deer and pronghorn, and since the proposed infill drilling would nearly triple the amount of surface disturbance, clear wildlife impact thresholds that would trigger adaptive management changes should be incorporated into the proposal.

With air quality, the BLM's proposed rate of drilling would emit so much additional pollution that human health air standards could be reached and the Valley's once pristine views will be further degraded (at least 29 more days per year of visible haze in Wind River Wilderness areas; over 90 more days per year in some communities). Therefore, a slower drilling pace and/or cleaner technologies should be mandated. Finally, more should be done in this proposal to address the pressure the drilling boom currently places on roads and other infrastructure, businesses, social services, and housing – all of which would be further stressed by this project.

Summary Recommendations = Key Changes, Clarifications, or Additions Needed:

- Periphery area set aside from new development for the life of the project
- Thresholds defined for prescribed adaptive management changes
- Adoption of all the components of Wyoming Game and Fish Department's Minimum Recommendations report (including any updates to that report).
- Binding and defined mitigation requirements, including for reclamation
- Clear direction provided regarding off-site mitigation, including provisions aimed at protecting undeveloped habitat elsewhere in the Valley
- Requirements for phasing development over time and space
- More measures to limit socio-economic impacts on community assets and services

Putting the Pinedale Anticline SEIS Proposal in Context:

What is allowed under the current Pinedale Anticline drilling plan signed in 2000 =

- 700 producing wells and/or 900 well pads
- 276 miles of roads and 400 miles of pipelines for gathering and sales
- 693 tons of nitrous oxide (NOx) emissions a year
- 4,485 acres of surface disturbance over existing level

Where we are now -- the development level projected for the end of 2006 =

- 662 wells from 348 well pads
- 90 wells drilled a year, average since gas field's authorization in 2000
- 182 miles of roads
- 142 miles of gathering pipelines
- 3,500 tons of NOx emissions per year
- 5,049 acres of surface disturbance

Additional development (beyond current 2006 levels) under BLM's proposed alternative C =

- 4,399 more wells from 250 additional well pads
- 232 wells drilled a year for the next 20 years
- 4,735 tons of NOx emissions per year
- 12,278 acres of additional initial surface disturbance

Wildlife

The Pinedale Anticline field overlaps a world-class wildlife resource: crucial winter range for one of the largest concentrations of big game in the United States. Everyone agrees intensive development here must occur cautiously to avoid sacrificing Wyoming's cherished mule deer, pronghorn, and sage grouse. Each winter thousands of mule deer and pronghorn reside on this 200,000 acre gas field outside Pinedale. One multi-year study funded by industry and BLM has documented a 46% decline in the number of wintering deer on the northern portion of the Pinedale Anticline since drilling began. Additionally, drilling has removed 1,300 acres of once productive habitat, according to the ongoing study by biologist Hall Sawyer. More troubling are preliminary findings that deer are now avoiding once preferred habitat that enables them to survive the winter. Sawyer's 2006 annual report suggests limiting the number of roads, well pads, and pipelines may be the only way to reverse these trends.

“Big game would continue to be adversely affected by well field development that causes direct loss of crucial winter range, other seasonally-used habitat, and decreased habitat function near roads and well pads due to human activity.”

-- Pinedale Anticline Draft SEIS p. viii

In exchange for consolidating development with directional drilling, industry has asked BLM to abandon seasonal drilling restrictions in part of the field. Written into the 2000 Decision, 1988 Resource Management Plan, and Wyoming BLM Mitigation Guidelines and Standard Practices, these rules are intended to reduce industry's drilling phase disturbance of wildlife during the winter when the animals are most vulnerable. Even with directional drilling, this infill project would still consume an additional 12,272 acres of habitat. In part, this is because these multi-well pads would need to be “mega” sized with some expected to occupy over 20 acres (i.e. 15 football fields in size). Further, the proposal would authorize winter drilling in “consolidated development areas” of intensive development, primarily along the Anticline's crest where *down-hole* spacing would result in one well per 10 acres resulting in a sacrifice area with minimal wildlife value.

Quality of Life

Besides aggravating impacts on wildlife and further degrading air quality, industry's Anticline infill plan could accelerate the decline in Sublette County's quality of life. Since the drilling boom began in the late 1990s, Pinedale and surrounding communities have been afflicted by increased traffic, crime (notably methamphetamine use and domestic violence), overstressed municipal infrastructure and services, labor shortages, limited affordable housing and decline in the tourism economy. Visitors can seldom find accommodations, which are often filled with gas field workers, and traffic levels and accidents have escalated. According to the SEIS, between 2000 and 2005, daily traffic on State Highway 351 increased from 640 vehicles (110 trucks) to 1,450 vehicles (380 trucks). Accidents in Sublette County during this period jumped from 271 (causing three deaths and 90 injuries) to 340 (causing eight deaths and 106 injuries).

Air Quality

The BLM has a pattern of underestimating air quality impacts from oil and gas development. In 2000, for example, the agency predicted a maximum of 693 tons in annual NOx emissions, the pollution from diesel exhaust that contributes to haze, acid deposition and respiratory problems. By 2005, however, emissions were almost five times that ceiling, throwing in doubt the validity of the BLM's environmental review. Now the BLM proposes to triple the rate of drilling over 2003 levels and has not fully taken into consideration the additional impacts from 250 wells to be drilled per year in the adjacent Jonah Field. Industry has pledged to implement Tier II emission control system on 60 percent of the drill rigs by 2009, but there is no guarantee that it will do so and the SEIS does not spell out how this will be achieved.

Recommendations

1) Adhere to the Wyoming Game and Fish Department's Minimum Recommendations.

The Wyoming Game and Fish Department, the agency with greatest scientific expertise in wildlife management issues in Wyoming, has developed a report titled, "Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats" available at <http://gf.state.wy.us/downloads/pdf/og.pdf>. These recommendations would allow for continued drilling but in a way that could help ensure natural gas development does not destroy the Upper Green's world-class wildlife resource. With respect to mule deer crucial winter range in high-impact development areas such as the Pinedale Anticline, the report recommends:

- maintain seasonal restrictions;
- adopt practices that lessen habitat disturbance, such as directional drilling, clustered development, piping liquid wastes and remote monitoring;
- requiring habitat-enhancement projects that mitigate direct and indirect habitat impacts;
- A reduced number of wells and drill pads approved annually;
- Whenever possible, not allowing development in identified wildlife migration corridors, in crucial winter range or near sage grouse leks.

2) Confine development to Concentrated Development Area

New drilling, pad construction, and road building should be explicitly limited to the industry-identified "concentrated development area" along the crest of the Pinedale Anticline for the life of the field (i.e. no outside drilling until this area has been fully exploited for its gas and fully reclaimed). Any additional drilling in the periphery area (for "delineation wells" or other gas development) as the SEIS seems to allow, could result in additional and severe impacts to wildlife, with relatively little contribution to natural gas production. As the SEIS makes clear, areas with the highest natural gas potential are limited in size and well defined—development should be limited to these areas until they have been fully exploited and reclaimed.

3) Thresholds for Adaptive Management Changes

The original 2000 decision for the Pinedale Anticline project included adaptive management provisions and it is clear from air and wildlife monitoring results that unanticipated impacts have ensued since then. Since this proposal would authorize significantly expanded drilling over two decades, it must include clearly defined thresholds for air and wildlife impacts that, if reached, would trigger immediate reduction in development levels/pace or other actions. A comprehensive and ongoing monitoring program must also be required to support this adaptive approach.

4) Phased development

Development in new areas should not be permitted until development in previously-disturbed areas has been fully reclaimed and ongoing disturbances minimized. In the 2000 Pinedale Anticline environmental impact statement, BLM acknowledged that, “BLM can regulate the manner and pace of development” and “staggering development over time [is] an ‘*obvious* alternative.’” Staged drilling (i.e. pacing development temporally) would spread the economic benefits of development over time, while softening its impacts to Sublette County’s air quality, wildlife, and quality of life. The interests of lease holders can be protected by BLM using its authority to suspend leases in areas that are not permitted for immediate development.

5) Mitigation Measures

The performance based standards approach as it is now described in this proposal fails to provide needed certainty and accountability. The measures described in Appendix C of the Draft SEIS need to be made more binding (i.e. without phrases like “where applicable” or “if needed”), more defined, and more extensive. Emission mitigation measures and reclamation requirements must be spelled out more clearly, with set dates for compliance and mandated actions if not met.

6) Off-site mitigation

One way to allay unavoidable wildlife impacts with intensive development on the Anticline is to protect, restore, and enhance nearby habitat. If off-site mitigation is to be included in the Anticline infill project (as it was for the adjacent Jonah Infill), BLM must go further to ensure that such off-site mitigation at least in part includes the acquisition or permanent protection of important habitat from future energy development. For example, this could mean designating key areas, such as parturition areas, sage grouse leks/nesting habitat, and migration corridors/bottlenecks, off-limits to new leasing and purchasing and retiring existing leases in these areas as part of such mitigation.

7) Safeguard air quality

BLM must set a cap on emissions to preserve the striking views in nearby National Parks and Wilderness Areas and to ensure the valley’s air quality meets standards designed to protect human health. Phased development would help protect the air quality by limiting the number of wells and amount of activity at any one time. BLM should explicitly require the types and deadlines for utilization of cleaner technology and practices, even if their acquisition might slightly slow the drilling rate and/or slightly increase the drilling costs for operators. Pilot demonstrations of low-emission alternatives, such as cleaner drill rigs, quantum leap dehydrators, flareless completions, and others, are promising, but help little unless BLM mandates their comprehensive use.

Take a Stand -- Send Comments by March 15!

The BLM Draft SEIS comment deadline is March 15, 2007. Send your comments to:

BLM Pinedale Field Office
Matt Anderson, project manager
PO Box 768, Pinedale, WY 82941

Email: WYMail_PAPA_YRA@blm.gov

Honorable David Freudenthal, Governor
State Capitol Building
Cheyenne, WY 82002

governor@state.wy.us