



United States
Department of
Agriculture

Forest
Service

Rocky
Mountain
Region

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File Code: 2580

Date: October 7, 2005

Mr. Robert Bennett
State Director
Bureau of Land Management
5353 Yellowstone Drive
Cheyenne, WY 82009

Dear Mr. Bennett:

Thank you for the opportunity to provide comments on the Jonah Infill Drilling Project Draft Environmental Impact Statement (DEIS). The proposed project is an expansion of natural gas drilling operations in Sublette County, Wyoming located approximately 20 miles southwest of the Bridger Wilderness Area. Please accept this cover letter and the attached detailed technical review as our comments on the DEIS. We provide this information in the spirit of cooperation with our partners in state and federal government. We believe by working together we can achieve the goal of providing energy development opportunities while simultaneously preserving and even enhancing air quality.

The Forest Service (FS) is dedicated to its stewardship role under the Organic Act and to its affirmative responsibility under the Clean Air Act to protect and enhance air quality related values (AQRVs) in designated Class I Wilderness Areas. The FS also has the responsibility under the Wilderness Act to protect the same values in all wilderness areas.

The FS appreciates having had the opportunity to participate in the development of the air quality modeling protocol for the DEIS, Air Quality Impact Analysis Supplement. We recognize the considerable time and effort required to produce the associated modeling analyses. The analyses predict the proposed project could have impacts at significantly high levels in the Bridger, Fitzpatrick and Popo Agie Wilderness Areas. In addition, the cumulative modeling analyses (project plus other regional sources) indicate existing visibility impairment in the wilderness areas. In order to meet its affirmative responsibility and avoid the need for consideration of an adverse impact determination or certification of visibility impairment, the FS recommends:

- Sufficient mitigation is employed at the onset of the project, and during all phases, to avoid impacts in the wilderness areas.
- Additional mitigation for the proposed project is requested because the preferred alternative, under all mitigation scenarios, predicts significant impacts to the wilderness areas.
- Government and industry work together to identify additional mitigation to further reduce emissions and the corresponding predicted impacts.



Specifically, reduction in impacts from drill rig emissions should be required as a condition of project approval. These reductions should be sought as soon as possible and at the greatest level achievable in combination with various phased development options. Solutions such as electrification of the well field, voluntary emission offsets from existing sources (in-field or otherwise), and energy conservation and efficiency measures may also help mitigate impacts by reducing emissions.

Successful implementation of this and future projects depends on innovative and creative solutions. Since the pace and scale of energy development continues to increase in this area, we suggest quarterly meetings with our partners to help strengthen ongoing adaptive management efforts, allow for timely responses to changes occurring in the gas fields and their associated effects, and provide the foundation for cooperative solutions. This interagency workgroup could:

- Provide semiannual assessment reports indicating the air quality status in SW Wyoming.
- Track enforcement of mitigation.
- Recommend additional actions as needed.

The FS would like to work cooperatively with our partners in taking a preventative approach toward resource protection in addition to applying remedial actions to reduce existing visibility impairment. We look forward to continuing our excellent relationship with BLM, the State of Wyoming and our other partners to develop mitigation solutions for inclusion in the final EIS and Record of Decision. Thank you again for the opportunity to provide comments on the Jonah Infill project. If you have any questions, please contact Bud Rolofson at 303-275-5752.

Sincerely,

/s/ Terri Gates (for)
RICK D. CABLES
Regional Forester, Region 2

/s/ Erin S. O'Connor (for)
CATHERINE L. BEATY
Acting Regional Forester,
Region 4

Enclosure

cc:
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