

Bush Administration Draft Would Dramatically Increase Drilling in Wyoming's Upper Green Region Already Busiest Onshore Gas Field with Most New Wells Per Year,

***BLM Rhetoric Attempts to Balance Harm to Air Quality, Wildlife
But Fails to Provide Concrete Monitoring, Safeguards***

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PINEDALE, Wyo. – The Bush Administration last week released a draft management plan for Wyoming's Upper Green River Valley that will guide oil and gas development on 1.2 million acres of federal mineral estate located there. The Bureau of Land Management's "preferred alternative" envisions drilling more than 7,000 new wells in the next 10 to 15 years -- opening large swaths of biologically important big game habitat to development and further threatening already degrading air quality.

Bounded by the Wind River, Gros Ventre, and Wyoming Mountain Ranges, the Upper Green River Valley – through a twist of geological fate – harbors some of the continent's most spectacular wildlife populations and also holds vast deposits of natural gas. Energy development already so thoroughly dominates this region that more than 75 percent of the 1.2 million-acres in this regional already are under lease.

The Upper Green River Valley harbors the largest block of publicly administered winter wildlife habitat in the Greater Yellowstone Ecosystem, the 17-million acre landscape surrounding the world's first national park. The Upper Green also is the home of the longest migration corridors for pronghorn in the Lower 48. While the BLM document acknowledges the harm drilling inflicts on the mule deer, pronghorn, sage grouse and other treasured wildlife species that winter in the Upper Green, the agency's preferred alternative lacks crucial details on necessary monitoring and enforcement that could ensure the health of the region's world-class wildlife resource, clean air, and quality of life.

"We need a plan that calls for energy development at the right pace and in the right place," says Linda Baker, field organizer for the Upper Green River Valley Coalition. "Local residents and visitors support responsible development of our natural gas resources because it's a common-sense, balanced approach that protects our way of life while guiding future energy development. This plan must 'Do It Right' the first time."

But BLM's preferred plan, Alternative Four, falls short. For example, it would:

- allow development on at least 70 percent, or almost 850,000 acres, of the resource area. Hundreds of thousands of acres of crucial winter range for big game, calving and fawning areas and migration routes could be subject to development.
- provide loopholes that would allow access to restricted lands along with looser wildlife stipulations on drilling should those areas prove to contain valuable reserves of gas.
- embrace "performance-based" management approach that fails to provide meaningful accountability on the part of industry and land managers.
- result in annual emissions of air pollutions topping 120,000 tons a year, more than triple 2001 levels.

- allow only four areas of critical environmental concern (ACEC) covering 14,530 acres despite considering up to nine ACECs over several hundred thousand acres.

The BLM's draft Environmental Impact Statement (DEIS) for the Resource Management Plan (RMP) for the Pinedale Resource Area of the Upper Green River Valley was published in the Federal Register on Feb. 16 and the 90-day comment period ends on May 18.

The Upper Green River Valley Coalition is a Pinedale-based group of sportsmen, business owners and conservationists that seeks to restore balance to the management of the valley's public lands and to temper the impacts of natural gas development. The group endorses Alternative 3, the only scientifically defensible plan of the four studied in the DEIS. This is a conservation-minded alternative that strives to protect the Valley's natural values, while allowing for robust oil and gas activity.

Background: The Upper Green has been the scene of a drilling boom that has resulted in more than 3,000 natural gas wells. Much of this activity is concentrated in the Pinedale Anticline and Jonah gas fields, which have become two of the nation's most productive fields thanks to new completion technologies that allow gas to be extracted from deep sandstone formations. For more information, see: <http://www.uppergreen.org/wyoming/wyoming.php>

Impacts of Energy Development: Both wildlife and air quality have suffered from the rapidly expanding energy work. Multi-year, industry-backed research has documented a precipitous decline in mule deer and sage grouse. Instead of curbing drilling in light of this disturbing development, BLM is considering approval of an industry proposal for a major escalation in the number of new wells and also the abandonment of seasonal drilling closures to protect wintering big game and sage grouse. This plan has met stiff opposition among Pinedale residents who fear the boom will devastate their quality of life and push out wildlife.

"We now have new, reliable scientific information and wildlife studies that can help guide Best Management Practices where energy development exists, and also show us where there are special places that should remain intact as vital habitats, such as crucial winter ranges, migration corridors and sage grouse leks," Baker says. "Our wildlife has declined severely in heavily industrialized areas, but we can preserve remaining wildlife populations from further decline, protect our incredible vistas and human health in our communities if we develop and use smarter technologies now."

The draft EIS recognizes the crucial role the Upper Green's winter range, migration routes and calving areas play in the overall health of the region's big game herds. For example, the preferred alternative does wisely call for setting aside 4,160 acres around Trapper's Point as an Area of Critical Environmental Concern (ACECs). Meanders in the Green and New Fork rivers west of Pinedale, create a classic wildlife "bottleneck" at this spot west of Pinedale, where thousands of migrating animals are funneled through a half-mile-wide corridor constricted by roads and rural subdivision.

Summary of Alternative Four: The proposed plan also recognizes that some of this important wildlife habitat is being lost to oil and gas development and acknowledges that "natural gas development on the Mesa has displaced mule deer to less suitable habitats." Alternative 4, the agency's preferred plan, divides the resource area into four categories of development levels:

1. Intensively developed fields: 175,750 acres, 15 percent, all within existing gas fields.
2. Minimally Developed areas: 672,470 acres, roughly 56 percent. These are sensitive lands where oil and gas activities may be limited to minimize wildlife impacts.
3. No surface occupancy (NSO): 205,100 acres, about 17 percent. Lands where surface disturbance would not be allowed and gas reserves accessed via directional drilling.
4. Unavailable for development: 156,900 acres, 13 percent. Lands withdrawn from leasing, specifically wildlife habitat along the Wind River Front, the Trapper’s Point bottleneck, the New Fork Potholes and other important areas.

Too Many Loopholes: BLM is making a positive step in recognizing the need to identifying areas that should be protected from full development, but nonetheless failed to place a higher percentage of land off limits despite the fact that BLM already has approved major infill drilling in other parts of the Upper Green. The BLM also included loopholes that could undermine existing wildlife protections making them meaningless. For example the agency could waive NSO protections if it appears federal mineral estate is being drained by wells on an adjacent non-federal lease, or if directional drilling is cost prohibitive. And “minimally developed” areas could be converted to areas of intensive development if well densities exceed one well per 160 acres. On paper, it appears that BLM intends to limit development for parts of the Upper Green, but in reality the status of these sensitive lands could easily change.

There is a Better Alternative: The RMP revision offers a chance to restore a true multiple-use ethic to public lands in the Upper Green River Valley. Alternative 3 of the draft management plan, for example, would prohibit development on the Upper Green’s most sensitive lands, or about half the resource area, providing contiguous swaths of protection between the Valley’s three majestic mountain ranges: the Winds, the Wyoming Range and the Gros Ventre. Here is a side-by-side comparison:

	Alternative 3	Alternative 4
Intensively developed	78,070 acres	175,750 acres
Minimally developed	498,790 acres (BLM includes NSO*)	672,470 acres
No Surface Occupancy		205,100 acres.
Unavailable for leasing	606,500 acres	156,900 acres

“Clearly the BLM itself understands that there’s a solution that would allow drilling to concentrate where the most natural gas is located while protecting the rest of the area,” said Peter Aengst of The Wilderness Society. “The Upper Green already is experiencing a tremendous energy boom – along with impacts on wildlife, air quality, and local quality of life. Some balance now would provide for energy needs, protect the Valley and make the most sense for today and tomorrow.”

*The BLM document appears to break out acreage amounts for Minimally Developed and NSO for Alternative 4 but does not do so for Alternative 3. Also, the acreage amounts in the BLM document for Alternative 3 and Alternative 4 are not equal, 1.18 million acres for Alt. 3 and 1.21 million acres for Alt. 4.