

## **Locals, Experts, and Conservationists All Agree:**

### **BLM Must “Go Back to the Drawing Board” and Fix Pinedale Anticline Plan to Better Protect Air, Wildlife**

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PINEDALE, Wyo. –A diverse array of Upper Green River Valley residents, wildlife experts, conservation groups, and others today urged the Bureau of Land Management to “go back to the drawing board” and prepare a final plan for drilling in the Pinedale Anticline that better protects air quality and wildlife from the proposed massive escalation in energy development.

Today marks the close of the public comment period for the BLM’s draft Supplemental Environmental Impact Statement (SEIS) on industry’s proposal for year-round and expanded drilling in the Pinedale Anticline project area that lies west and south of the town of Pinedale. The draft proposal calls for 4,400 more wells, almost nine times the number currently in place, drilled at a rate of up to 232 a year. Seasonal drilling restrictions, set up to protect wintering big game, also would be abandoned.

“Wildlife experts, air quality specialists and local citizens all are deeply concerned about what this massive escalation in drilling could mean for our local quality of life,” said Linda Baker with the Upper Green River Valley Coalition. “The Anticline has world-class habitat for big game and sage grouse, and the Valley has some of the best air quality in the nation. All of that could be lost with this dramatic increase in development. The BLM needs to make significant improvements to its draft proposal if it’s going to help protect our quality of life.”

Further impacts from the BLM proposal would include almost nine times more annual nitrous oxide (NO<sub>x</sub>) emissions above what was originally permitted, and 12,278 acres of new surface disturbance.

The Anticline proposal also should be viewed in the context and cumulative impact of the recently approved infill project on the neighboring Jonah Field (3,100 wells) and the recently released Resource Management Plan for the Upper Green area, where the BLM’s “preferred alternative” envisions drilling at least 7,000 new wells in the next 10 to 15 years – and would open large swaths of biologically important big game habitat to development and further threaten already degraded air quality.

“The current level of development is already causing huge problems for the sage grouse and mule deer,” said Suzanne Lewis, with the Laramie-based Biodiversity Conservation Alliance. “It is dumbfounding why the BLM would propose to ratchet up development by a factor of nine without taking full advantage of advanced technologies to drill the field with a much smaller footprint on wildlife habitat.”

The BLM is expected to release a final decision late this year.

“BLM can show the public that it can ‘do it right’ on the Pinedale Anticline or it can proceed with business as usual and allow maximum development with minimal mitigation,” said Bruce Pendery, program director with the Wyoming Outdoor Council. “The current plan follows the latter path. We are recommending that BLM adopt a number of practical provisions that would allow for development but protect other key resources.”

Pendery and others worked on a series of recommendations to the BLM as part of the public comment process and submitted them to the agency earlier today. A short summary of those comments follows this release.

“While the BLM’s proposal contains some good measures to start to limit industry’s footprint, it still poses a vast expansion of the impacts associated with this gas field,” noted Chris Mehl with The Wilderness Society. “We’re not opposed to any or all drilling and the BLM can take some common sense steps for the Anticline proposal that still would put people to work, get out the gas, and protect the air and wildlife so important to the local quality of life.”

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## **Summary of 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.