



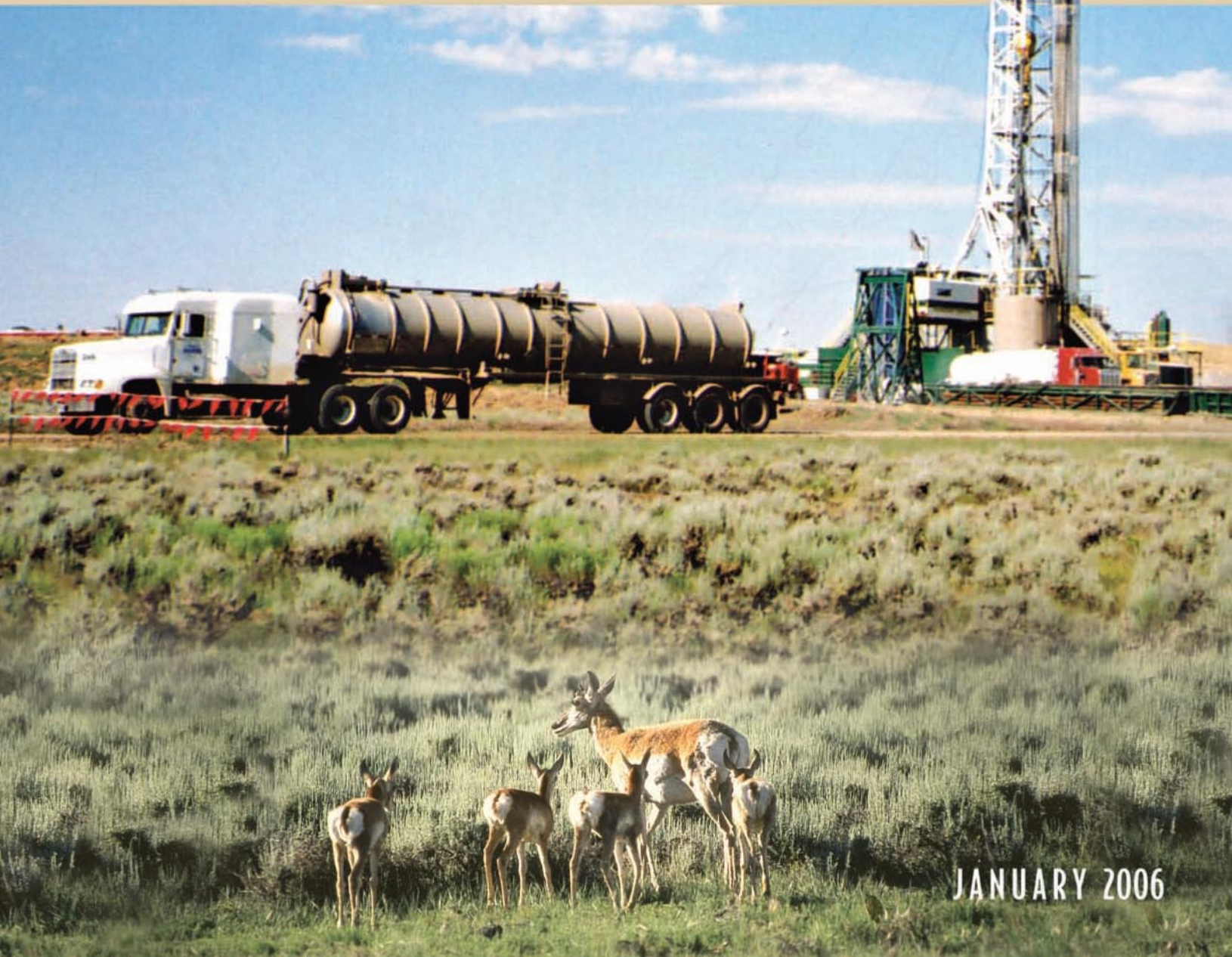
U.S. Department of the Interior



Bureau of Land Management
Pinedale and Rock Springs Field Offices

PUBLIC COMMENT ANALYSIS REPORT

▶ JONAH INFILL DRILLING PROJECT SUBLETTE COUNTY, WYOMING



JANUARY 2006

Jonah Infill Drilling Project Public Comment Analysis Report

Prepared for

**Bureau of Land Management
Pinedale Field Office
Pinedale, Wyoming**

Prepared by

SWCA Environmental Consultants

January 2006

Jonah Infill Drilling Project Public Comment Analysis Report

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To the Reader

The *Public Comment Analysis Report*, produced in support of the Final Environmental Impact Statement (FEIS) for the Jonah Infill Drilling Project (JIDP) in Sublette County, Wyoming, is divided into three major sections. Part I is a narrative summary of the process by which public comments received during the 60-day comment period following the February 2005 publication of the JIDP Draft Environmental Impact Statement (DEIS) and the 60-day comment period following the August 2005 publication of the *Draft Jonah Infill DEIS Air Quality Technical Support Document Supplement* and the *Jonah Infill Drilling Project Draft Environmental Impact Statement Air Quality Impact Analysis Supplement* were collected and analyzed. Part I also includes information on how the DEIS and air quality supplements were distributed to agencies and members of the public, how public meetings on the JIDP were conducted, and the major issues and concerns that were identified during the process.

Part II consists of a table that includes all substantive comments received during the DEIS comment period, and Part III is a table of all substantive comments related to air quality issues. Each of these tables also includes BLM's formal responses to the substantive comments the agency received. To allow the individual reader to quickly locate his or her own comments and BLM's corresponding response(s), the Part II and Part III tables are each preceded by a table showing the submitter ID number that was assigned to those persons and/or organizations that submitted comments.

Thus, to find one's own comments the reader should first glance through Table II-A or Table III-A to locate his or her name and note the corresponding submitter ID number in the left-hand column. The reader may then turn to Table II-B, "Substantive Comments on the JIDP DEIS," or Table III-B, "Substantive Comments on JIDP Air Quality Issues," where all comments appear in numeric order by submitter ID. It should also be noted that, due to the large number of individual comment submissions on the DEIS, comments in Table II-B were also assigned an alphabetic "submittal type" prefix as follows: E = email; L = letter, F = form, and FM# = form letter.

For a detailed explanation of how individual comments were determined to be "substantive," please refer to the "Comment Analysis Methodology" section that begins on page 9 of Part I of this report.

**Part I: Narrative Summary of the Jonah Infill Drilling
Project Public Comment Analysis Process**

Part I: Narrative Summary of the Jonah Infill Drilling Project Public Comment Analysis Process

Introduction

In February 2005, the Bureau of Land Management's (BLM's) Pinedale Field Office in Pinedale, Sublette County, Wyoming, completed preparation of a Draft Environmental Impact Statement (DEIS) for the proposed Jonah Infill Drilling Project (JIDP). On February 11, 2005, a Notice of Availability (NOA) of the DEIS for public review and comment was published in the *Federal Register* (Volume 70, No. 28, pp. 7296–7298). A copy of the NOA, which included detailed instructions on how to submit comments on the DEIS, is provided in Appendix A. The DEIS was distributed in both paper and electronic formats (on CD-ROM), and was available for downloading from the BLM's website at www.wy.blm.gov through April 8, 2005. Additional copies of these volumes were made available for public inspection at the Pinedale Field Office, 432 East Mill Street, Pinedale, and at the BLM Wyoming State Office, 5353 Yellowstone Road, Cheyenne. The BLM invited public and agency comment on the DEIS and the technical support documents for a period of 60 calendar days, until April 12, 2005.

Subsequent to publication of the DEIS it became apparent that the air quality modeling and analysis that had been done for the DEIS was based on data that were insufficient to provide meaningful evaluation of the affected environment, largely because new analysis in another document showed emission levels of certain pollutants within the regional airshed had increased significantly since the original data had been compiled. Following consultation with the Environmental Protection Agency (EPA), the Wyoming Department of Environmental Quality (WDEQ), and BLM Wyoming's own air quality specialists, the BLM determined that supplemental air quality modeling and analysis would need to be conducted, published as a supplemental information document, and the results of these studies incorporated into the Final JIDP EIS. Therefore, on April 12, 2005, BLM published an NOA in the *Federal Register* (Vol. 70, No. 69, p.19094) to inform the public that additional time would be made available to submit comments, but that these comment submissions must be limited to the air quality information presented in the DEIS. A copy of this NOA is included in Appendix A. When the supplemental air quality analyses were completed, the BLM published a new NOA on August 9, 2005, in the *Federal Register* (Vol. 70, No. 152, pp. 45187–46188), announcing the availability of the supplemental information for a 60-day public review period (until October 7, 2005). The new air quality information was made available in two documents: the *Draft Jonah Infill DEIS Air Quality Technical Support Document Supplement*, and the *Jonah Infill Drilling Project Draft Environmental Impact Statement Air Quality Impact Analysis Supplement*.

This narrative summary provides details of the numbers and types of comments that were received during the comment period for the DEIS and for the air quality supplemental information, and describes the process by which all comments were analyzed to determine their relevance and significance to subsequent revision of the DEIS and the air quality technical support document supplement. Comments from the public, agencies, and all other interested groups are represented.

The Role of Public Comment in the NEPA Process

Solicitation of public comment on draft plans for major federal actions is required under the National Environmental Policy Act (NEPA). Specifically, the BLM and other federal agencies must “assess and consider [the resulting public] comments both individually and collectively” (Title 40 Code of Federal

Regulations [CFR] 1503.4). The comments that have been received on the JIDP DEIS are viewed as critical to helping the BLM modify or clarify, as necessary, the existing alternatives and the preferred alternative to best suit the purpose and need for the project in light of public, project sponsor, and cooperating agency input; to potentially develop and evaluate new alternatives; to supplement, improve, or modify the existing environmental analyses; and to correct factual errors in the DEIS.

Distribution of the Draft Environmental Impact Statement

In February 2005, paper copies of the DEIS were distributed to a total of 581 parties, including elected officials, regulatory agencies, Indian tribes, commercial enterprises, media outlets, and members of the public. Each copy of the DEIS also contained a CD-ROM of the main text, the appendices, and the air quality and socioeconomic analysis technical support documents. Certain individuals or organizations also requested paper copies of the two technical support documents, which were sent as requested along with the DEIS, while others requested only portions of the DEIS or its associated volumes (for example, some wished to receive only the Executive Summary). A number of agencies and organizations requested specific numbers of volumes to distribute within their organizations, which were sent as requested. A total of 26 paper copies of the DEIS were subsequently returned by the U.S. Postal Service as undeliverable.

The distribution list for mailings of the DEIS was derived primarily from the 2003 scoping mail list for the Jonah Infill project, which was generated from a combination of the prior Jonah NEPA document lists and comments. Those entities not commenting during scoping and not required by law or regulation to receive the DEIS were dropped. Additional individuals, groups, and entities were added based on input from BLM and State of Wyoming staff and as a result of Operator requests. Other individuals and entities not on the original list were added if they commented during the scoping process (i.e., responded based upon *Federal Register* announcements, media, or other sources) or submitted postcard responses (see Appendix B). A complete list of all parties to whom the DEIS was sent is provided in Appendix B.

At the public meetings on the DEIS held in March 2005 (see the “Public Meetings” section below), copies of the CD-ROM containing the main text, the appendices, and the air quality and socioeconomic analysis technical support documents were made available for distribution by hand to all attendees who requested one. In addition, the DEIS and its supporting documents were freely available for downloading from the BLM Wyoming website at www.wy.blm.gov. The BLM has no way to ascertain how many copies of the DEIS have been distributed via computer downloads.

Notices of publication of the DEIS were sent to a large number of newspapers, magazines, newsletters, and other print media outlets, as well as to television and radio stations in Wyoming and elsewhere in the country. A complete list of media sources notified of publication of the DEIS is provided in Appendix B.

Distribution of the Air Quality Supplemental Information

In August 2002, postcards announcing the availability of the *Draft Jonah Infill DEIS Air Quality Technical Support Document Supplement*, and the *Jonah Infill Drilling Project Draft Environmental Impact Statement Air Quality Impact Analysis Supplement* were mailed to 176 individuals, organizations, and agencies that had expressed an interest or concern about JIDP-related air quality issues during the NEPA process. A total of 47 paper or electronic (CD) copies of the two documents were mailed to those requesting them and to public libraries. A complete list of all parties to whom the air quality documents were sent is provided in Appendix C. Paper copies were also made available to the public in libraries in Big Piney, Kemmerer, La Barge, Pinedale, Rock Springs, Wyoming, and in BLM offices in Pinedale and

Rock Springs. As with the DEIS, notices of publication of the air quality supplemental documents were sent to appropriate media outlets (see the preceding paragraph).

Public Meetings

Public Meeting Notices

BLM-sponsored public meetings to provide an opportunity to discuss the Jonah Infill Drilling Project DEIS were held on March 21, 2005, at BLM's Rock Springs office and March 23, 2005, at Rendezvous Pointe in Pinedale. Notices of these meetings, including dates, times, and locations, were distributed to a list of newspapers and other print media, television stations, radio stations, and Internet-based media. A copy of the press release announcing the public meetings can be found in Appendix D. A total of 38 individuals attended the March 21 meeting in Rock Springs and 66 attended the March 23 meeting in Pinedale.

No public meetings were held in connection with the air quality supplemental documents issued in August 2005.

Meeting Format

Agendas, handouts, and sign-in sheets were available at each of the meetings. Upon arrival, attendees were asked to sign in and indicate whom they were representing. Each of the two meetings began at 3 p.m. with an open house. At 4 p.m., BLM made a brief formal presentation at each meeting to introduce the topics for discussion. Topics covered included the major environmental issues relevant to the Jonah Infill project (e.g., air quality, sage-grouse habitat and pronghorn migration routes, surface water runoff) and BLM's strategies for managing the project based on established performance objectives, continuous monitoring, and adaptive management. Attendees were then provided information on whom to contact for further information on the DEIS and were furnished with instructions on how to submit comments. Exhibits with various visual and informational displays were placed around the meeting room, with specialists from BLM available to further explain the DEIS, answer questions, and solicit input during the entire 5 hours. The meeting participants were given an opportunity to ask questions and engage in two-way dialogue with the BLM and project proponents after each presentation, in a public format. The public was asked to record their comments on comment forms provided at the sign-in table, or to mail or email them by April 12, 2005. A few comments sheets were completed the day of the meetings; most were mailed at a later date. Copies of the agendas for each meeting, BLM's PowerPoint presentation, and the comment form are provided in Appendix D.

Summary of the Comments Received

Comments on the Draft Environmental Impact Statement

The BLM received 839 written submittals of comments (letters, emails, forms, etc.) on the JIDP DEIS, containing a total of 764 individual comments that were identified as "substantive," or meaningful to revision of the DEIS. Throughout the comment analysis process, the BLM made every effort to be inclusive rather than restrictive of how comments were considered, and the threshold for what was determined to be a "substantive" comment was deliberately set low. The BLM did not, however, consider comments that were submitted anonymously, and comments that were judged to be completely unrelated to the Jonah Infill project (such as requests for employment) were eliminated from any further

consideration. The exact process by which comments were read, evaluated for relevance, coded and analyzed is described in the “Comment Analysis Methodology” section below.

Of the total 839 comment submittals received, 11% came in the form of hard-copy letters, 8% as emails, 80% as formatted template letters from organized stakeholder groups (one of the template letters comprised 67% of the total comment submittals), and less than 1% as forms. All comments received were assigned, based on content, to one of 34 designated issue categories. Figure 1 illustrates the distribution of comments by method of submission. Figure 2 shows the distribution, by percentage, of the most frequently mentioned substantive issues.

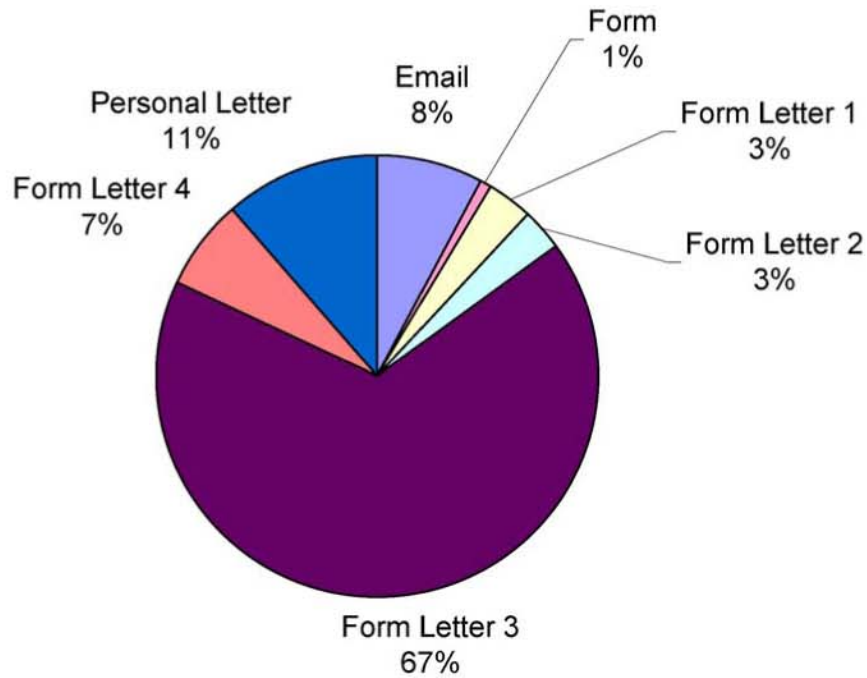


Figure 1. Types of Comment Submittals Received on the JIDP DEIS

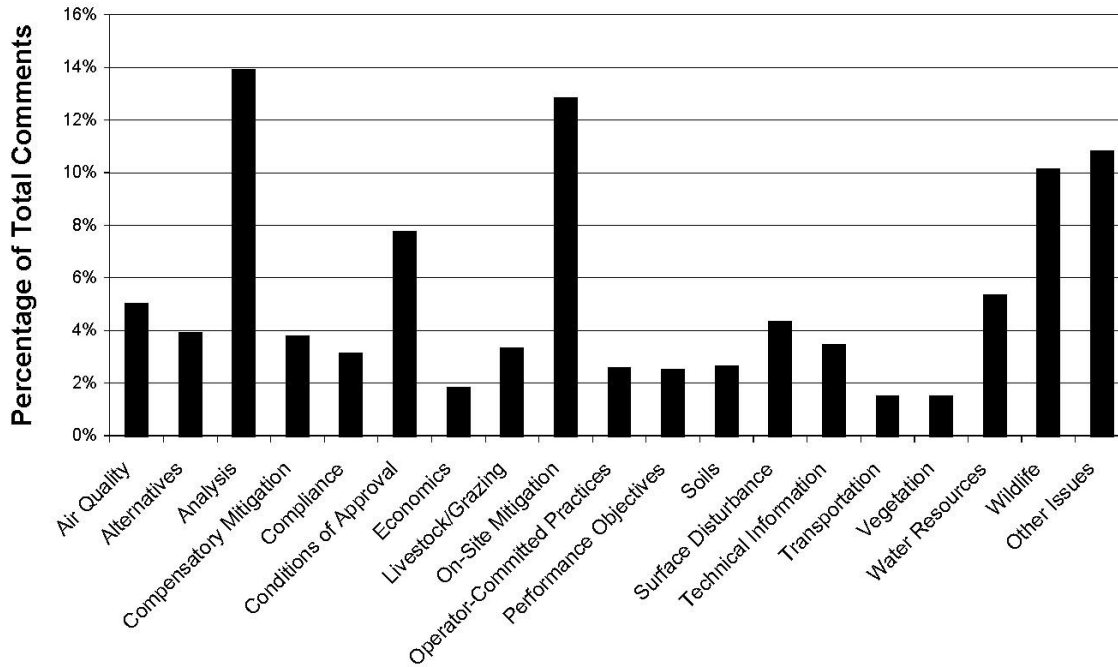


Figure 2. Distribution of Substantive Issues in Comments on the JIDP DEIS

Geographic Origin of Comments Received on the JIDP DEIS

Geographic information for each comment submittal received was entered into a Microsoft® Access database. Comment submittals on the JIDP DEIS were received from 19 states, with a single submittal originating in Alberta, Canada. A total of 629 responses, or 75%, originated in Wyoming. Another 74 responses came from Colorado, 24 from Utah, and 20 from Montana. The place of origin was unidentifiable for 46 responses (5%), which were received in a format that did not reveal geographic origin. Table 1 shows the geographic distribution of comment submissions by state and foreign country. Table 2 shows the distribution by county within Wyoming. Figure 3 shows the geographic distribution of comment submittals received. Figure 4 shows a more detailed distribution of comment submittals received from within Wyoming only.

Distribution of Comments by Organizational Affiliation

Comments on the JIDP DEIS were received from unaffiliated individuals, government representatives, and various organizations, including environmental, recreational, and ranching groups. Unaffiliated individuals accounted for 86% (723 comments) of the total responses. Organization types were tracked for each letter, comment form, fax, email, or encountered in the course of the content analysis. The distribution of comments by organizational affiliation is shown in Table 3.

Table 1. Geographic Distribution of Responses by Country and State/ Province

Country	State/Province	Number of Responses
United States	Arizona	1
	California	2
	Colorado	74
	Idaho	7
	Illinois	1
	Kansas	3
	Michigan	2
	Montana	20
	New Jersey	1
	New Hampshire	1
	New Mexico	3
	Nevada	1
	North Dakota	6
	Oklahoma	3
	Texas	8
	Utah	24
	Washington	4
	Wisconsin	2
Wyoming	629	
Canada	Alberta	1
Unknown Geographic Location		46
Total		839

Table 2. Geographic Distribution of Comment Submittals by County in Wyoming

County	Number of Responses	
Albany	4	
Big Horn	1	
Campbell	1	
Carbon	2	
Converse	3	
Fremont	16	
Laramie	7	
Lincoln	11	
Natrona	35	
Park	4	
Platte	3	
Sheridan	3	
Sublette	175	
Sweetwater	314	
Teton	6	
Uinta	34	
Unknown Geographic Location		10
Total	629	

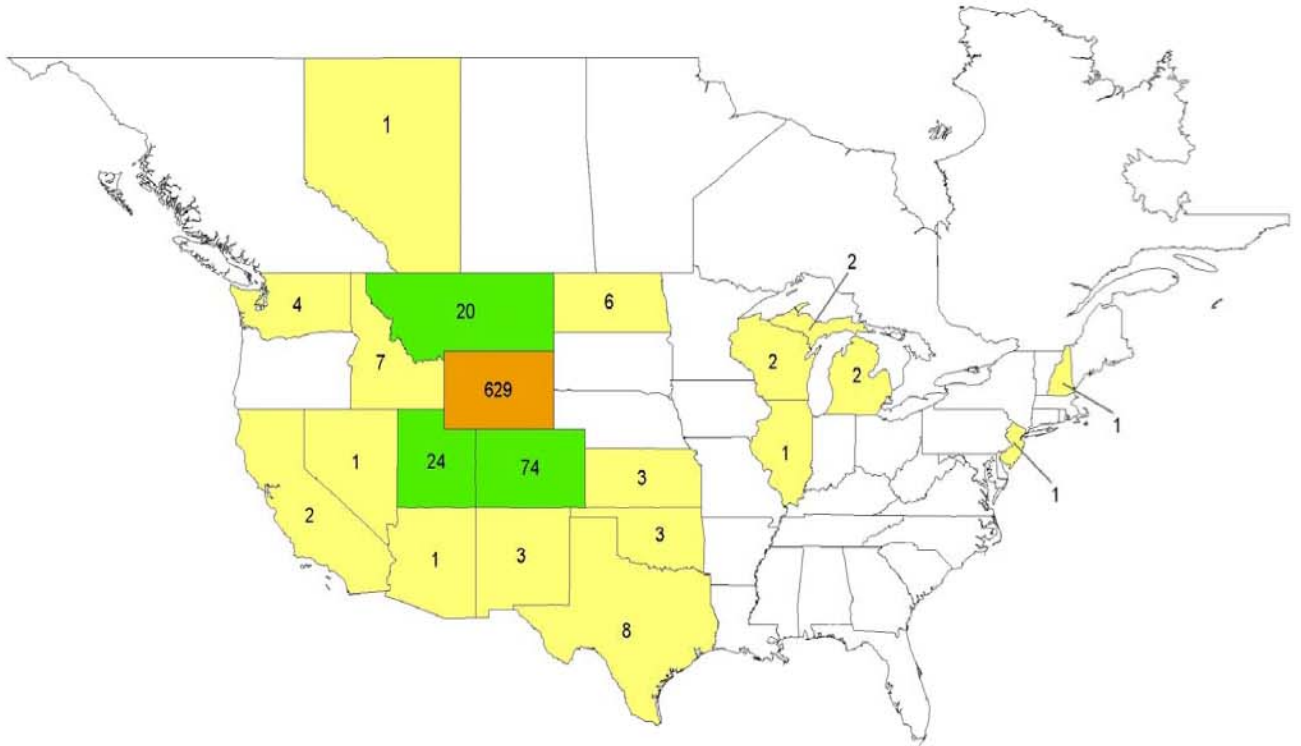


Figure 3. Geographic Distribution of Comment Submittals

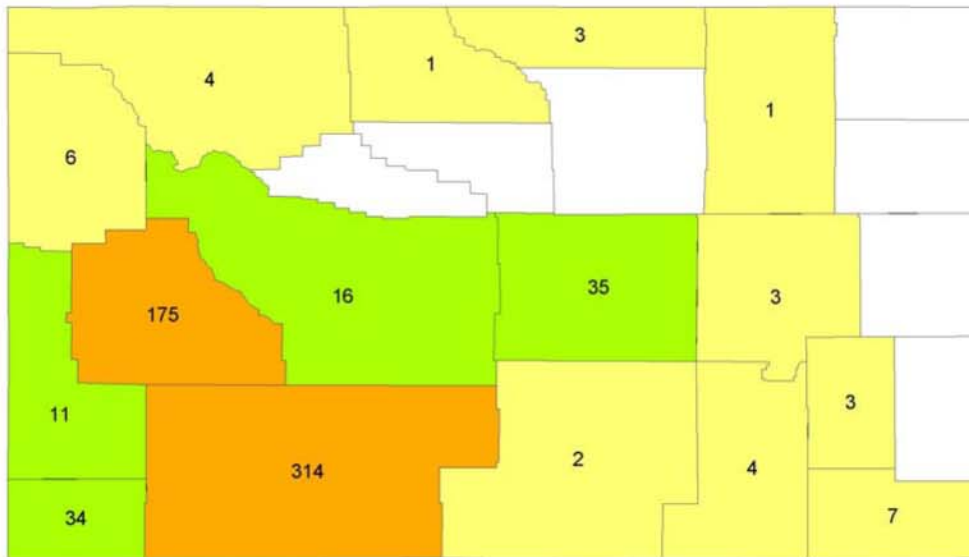


Figure 4. Distribution of Comment Submittals Received from Wyoming

Table 3. Comment Submissions on the JIDP DEIS by Organizational Affiliation

Advantage Resources, Inc.	National Wildlife Federation
Amerifox Industries, LLC	Nerd Gas Company LLC
ASCG Inc.	North American Grouse Partnership
B&B Oilfield Services	Northwest Mining Association
Baker Hughes, Inc.	Office of State Lands and Investments (WY)
Ballard Petroleum Holdings, LLC	Office of the Governor
Bear Cub Energy, LLC	Oxbow Mining LLC
Bill Barrett Corp	Padco, LLC
Biodiversity Conservation Alliance	Patterson-UTI Drilling Company, LP
BP America Production Company	Pechin Engineering
Brokerage Southwest	Petroleum Association of Wyoming
Burns Wall Smith & Mueller, P.C.	Pruitt Gushee
Cameron, Northern Rockies District	Public Lands Advocacy
Caza Drilling	Rat Hole Managers, Inc.
Center for Native Ecosystems	Rock Springs City Council
City of Rock Springs	Rock Springs Grazing Association
Dolar Energy LLC	Rocky Mountain Region PFUSA
Double Eagle Petroleum Co.	Samson Resources
Dugan Production Corp.	Schlumberger Data & Consulting Services
Dynamic Drilling Fluids, Inc.	Schlumberger, US Land Western Region
EnCana Oil & Gas (USA)	Shell Exploration & Production Co.
Environmental Protection Agency, Region 8	Sierra Club - Teton County
Environomics	Sprinkle & Associates, LLC
EOG Resources, Inc.	State Senator, Sublette/Lincoln/Sweetwater/Uinta
Equity Brokers GMAC	Sterling Construction MGT, LLC
Evergreen Energy	Sublette County Attorney
EXCO Resources, Inc.	Sublette County Commissioners
Fidelity Exploration & Production Company	Sweetwater County Commission
Flaming Gorge PFUSA	Sweetwater Economic Development Assoc.
G & E Livestock, Inc.	Sweetwater Sportsmen for Fish and Wildlife
Gene R. George & Associates, Inc.	The Wilderness Society
Greenhalgh, Beckwith, Lemich, Stith & Cannon	Town of Pinedale
Greater Yellowstone Coalition	Trout Unlimited, Public Lands Initiative
Hayden-Wing Associates	Ultra Resources, Inc.
Helm Energy Company	Upper Green River Valley Coalition
Independent Petroleum Assoc. of Mountain States	Wellogix, Inc.
Iron Creek Energy Group, LLC	Western Watershed Project
J.W. Williams, Inc.	White Eagle Exploration, Inc.
Jackson Hole Conservation Alliance	Wold Oil
Kail Consulting	Wyoming Dept of Agriculture
Kerr-McGee Oil & Gas Corp.	Wyoming State Geological Survey
Kinder Morgan, Inc.	Wyoming Business Alliance
Lesair Environmental, Inc.	Wyoming Game and Fish Dept.
Lewellen Consulting, Inc.	Wyoming Legislature
Log Inn Supper Club	Wyoming Oil & Gas Conservation Commission
Melange International	Wyoming Outdoor Council
Mountain Petroleum Corp	Wyoming Wildlife Federation
Mountaintop Consulting, LLC	

Comments on the Air Quality Supplemental Information

The BLM received 21 letters and 17 emails in response for their request for comments on the air quality supplemental information. These submittals contained 383 individual comments that were identified as “substantive,” or meaningful to revision of the DEIS and/or the air quality technical support document.

Of the total submittals, 24 (63%) came from Wyoming, 10 (26%) came from Colorado, 2 (5%) came from Utah, and 1 each (<3%) came from the State of Washington and Washington, D.C. Only seven comments were submitted by private individuals; the remainder were submitted by persons affiliated with or on behalf of the organizations listed in Table 4.

Table 4. Comment Submissions on the Air Quality Supplemental Information by Organizational Affiliation

Biodiversity Conservation Alliance	The Wilderness Society
BP American Production Company	Town of Big Piney, Wyoming
City of Rock Springs, Wyoming	Town of Jackson, Wyoming
EnCana Oil & Gas (USA), Inc.	Town of Marbleton, Wyoming
Environmental Defense	Trout Unlimited
Environomics, Inc.	Ultra Resources, Inc.
First Interstate Bank - Casper Office	Upper Green River Valley Coalition
Grand Teton National Park	U.S. Environmental Protection Agency, Region 8
Greater Yellowstone Coalition	U.S. Senate
Greenhalgh, Lemich, Stith & Cannon, P.C.	USDA Forest Service - Rocky Mountain & Intermountain Regions
Independent Petroleum Association of Mountain States	Western Business Roundtable
Jackson Hole Conservation Alliance	Wyoming Business Alliance, Wyoming Heritage Foundation
Petroleum Association of Wyoming	Wyoming Department of Environmental Quality
Questar	Wyoming DEQ - Air Quality Division
Rock Springs Chamber of Commerce	Wyoming Outdoor Council
Shell Rocky Mountain Production, LLC	Wyoming Public Radio
Sublette Board of County Commissioners	

Comment Analysis Methodology

The system used to analyze comments on the JIDP DEIS and the air quality supplemental information has three main components: a two-part coding structure and process, a comment database, and this narrative report of the results of the analysis. Initially, a coding structure was generated to help sort comments into logical groups by issue (in this case, by specific resources and planning processes applicable to the Jonah Infill project area). The issue coding structure was derived from an analysis of the range of issues covered in relevant past planning documents, legal guidance, and the types of comments received from the public for this project. Use of these codes allows for quick access to comments in the database on specific topics. Table 5 shows the issue categories that were determined to be most inclusive of the substantive comments received on the JIDP EIS. Table 6 lists the issue categories identified for the air quality supplemental information.

Table 5. Issue Categories for Comments on the JIDP DEIS

Resource Issues	Procedural Issues
Air Quality (including visibility)	Alternatives
Cultural Resources	Analysis
Economics	Compliance with Laws (other than NEPA), Agency Policy, and Management Plans
Hazardous Materials	Compensatory Mitigation
Health/Safety	Conditions of Approval
Land Ownership	Editorial
Land Use	On-Site Mitigation
Livestock/Grazing	NEPA
Mineral Resources/Natural Gas Recovery	Operator-Committed Practices
Noise	Performance Objectives
Paleontology	Public Participation
Recreation	Site-Specific Conditions of Approval
Social	Technical Information
Soils	
Surface Disturbance/Directional Drilling	
Topography	
Transportation	
Vegetation	
Visual Resources (other than visibility)	
Water Resources	
Wildlife	

Table 6. Issue Categories for Comments on the Air Quality Supplemental Information

Agency Recommendations, etc.	Mid-/Far-Field Modeling - Meteorological Data
Background Concentrations	Mid-/Far-Field Modeling - Visibility
CALPUFF	Mid-/Far-Field Modeling - Inconsistencies with Monitoring Data
Conservative Analysis	Mitigation
Early Project Development Stage Modeling	Monitoring Data
Emissions, Project	Near-Field Modeling
Emissions, Regional	Ozone & VOCs
Health	Regulatory Compliance & Commitments
Mid-/Far-Field Modeling	Regulatory Compliance & Commitments - Air Quality Standards
Mid-/Far-Field Modeling - Acid Deposition/Sensitive Lakes	

The second phase of the analysis involved carefully reading each piece of correspondence, identifying and coding the substantive and nonsubstantive comments from each submission, then assigning the individual statements to the appropriate resource or procedural issue categories listed in the preceding two tables. Substantive comments require a response from BLM in the form of either a modification of the DEIS or an explanation of why the comment does not warrant further agency response. Nonsubstantive comments do not require a response from BLM, but must be taken into account by the decision-makers. The codes used to categorize by type the comments on the JIDP DEIS are shown in Table 7, and codes used to categorize by type the comments on the air quality supplemental information are shown in Table 8. No non-substantive comments were coded for the air quality material.

Table 7. Category Codes by Type for Comments on the JIDP DEIS

Substantive Comments	
A	Identifies a specific flaw in the analysis or inaccuracy or discrepancy in the DEIS
A1	Calls for specific text changes
B	Provides new information pertaining to an alternative, or indicates that additional specific information is needed
C	Identifies a new relevant issue or expands upon an existing issue
D	Identifies a different way (alternative) to meet the underlying need
E	Asks a specific relevant question that can be meaningfully answered or referenced
F	Identifies an additional source of credible research, which, if utilized, could result in different effects
Non-Substantive Comments	
V1	Supports the Proposed Action/Opposes the Preferred Alternative
V2	Supports the Preferred Alternative/Opposes the Proposed Action
V3	Supports the No Action Alternative/Opposes other alternatives
V4	Expresses an opinion regarding other alternative(s)
W	Primarily focuses on personal values or opinion, other than in regard to the alternatives
X	Restates existing management direction, laws, or policies that were used in the design and analysis of the project (or provides personal interpretation of such), or restates analysis or information documented in the DEIS
Y	Lacks sufficient specificity to support a change in the analysis or permit a meaningful response, or is composed of general or vague statements not supported by data or research
Z	Provides comment that is considered outside the scope of the analysis (not in compliance with current laws and policies, is not relevant to the specific project proposal, or is outside of the decision-maker's area of authority)

Table 8. Category Codes by Type for Comments on the Air Quality Supplemental Information

A1	Specific changes to Impact Analysis Supplement draft
A2	Specific changes to Air Quality TSD Supplement draft
A3	Specific changes to DEIS
A4	Specific comments (page references) on 2004 Air Quality TDS
B	Criticisms of modeling methodology
C	Other substantive comments

All codes were assigned by one staff person, validated by another, and each discrete comment was entered as a verbatim quote, with its assigned code, into the comment database. It is important to note that, while an effort has been made to qualify the intensity of the public's expressions, the comment analysis process is not and should not be considered a vote. All comments were treated evenly and were not weighted by number, organizational affiliation, "status" of the commenter, or other factors. Emphasis was on the content of a comment rather than who wrote it or the number of people who agreed with it.

The third phase included identifying statements of public concern and preparing this narrative report. The statements of concern are a compilation of comments received from the public and various agencies in response to the DEIS. The intent of this compilation is to provide representative statements that capture, with a minimum of repetition, all major concerns expressed during the public comment period. Minor requests for word changes in the EIS that do not affect content or meaning of the text are not included. The statements are not necessarily verbatim iterations of comments received but in many cases include similar or exact phrasing.

Public Disclosure of Comments under the Freedom of Information Act

Public comments and information submitted regarding the JIDP DEIS and the air quality supplemental information, including names, email addresses, and street addresses of the respondents, have been made available for public review at the Pinedale Field Office during regular business hours (7:45 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents were given the opportunity to request confidentiality, which obligates the BLM, to the extent allowed by the Freedom of Information Act and Privacy Act, to withhold their name, email address, and street address from public review or disclosure. All information submitted by organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, was made available for public inspection in its entirety.

Concern Statements by Issue/Procedural Category

Concern statements are not intended to replace actual comment letters or sample quotes. Rather, they are provided here to help guide the reader to comments on the specific topic in which he or she is interested. The statements are presented below in alphabetic order by issue category.

Air Quality (Comments on DEIS)

The BLM should prevent any additional deterioration of air quality in the region due to JIDP. The BLM should establish air quality standards to improve existing air quality, and then enforce these standards vigorously.

The air quality analysis in the DEIS and the Technical Support Document (AQTSD) is misleading and inaccurate, and the sheer size of the analysis obscures critical flaws that vitiate the usefulness of the DEIS to accurately portray and analyze the air quality impacts of this project.

The BLM should require Tier II engines on all drilling rigs to reduce air quality impacts, and should require air quality monitoring.

The BLM's air quality modeling is flawed because the background concentrations used are non-representative of the existing situation in the Pinedale area. As a result, the BLM cannot adequately analyze whether or not the federal or state ambient levels are being violated.

The BLM, in cooperation with the state, must ensure air quality monitoring is included in the FEIS as a required mitigation measure for all alternatives. The BLM cannot continue to operate without a clear understanding of how much degradation has already occurred and how much more degradation the projects it is approving is causing.

The BLM's air quality modeling is flawed because it assumes 3,100 wells, while the Preferred Alternative and Proposed Action inappropriately allow *more* than 3,100 wells (if more gas is recoverable after 3,100 wells are completed, more wells would be allowed). A specific limit of wells authorized needs to be identified, and modeling must be based on that limit.

The BLM used inaccurate drill rig assumptions, resulting in drastically underestimated NO_x emissions contrary to actual NO_x emissions in the Pinedale Anticline Field Area. These inaccuracies impact in-field, near-field, visibility, and the cumulative air quality analysis.

The BLM must correct inconsistencies between the DEIS and the Air Quality Technical Support Document (AQTSD).

The BLM should more clearly explain why ozone was treated differently from other criteria pollutants; that is, why a lower background level was used instead of the levels reported in Table 3.1 (AQTSD). If the Table 3.1 background levels had been used, both 1-hour and 8-hour concentrations of ozone would have violated federal and state standards.

The BLM inappropriately excluded numerous emission sources and improperly accounted for emissions that were included; consequently, its cumulative impact analysis underestimated emissions. The BLM provided little explanation justifying the excluded sources.

The BLM failed to delineate an appropriately large geographic scope in its modeling domain resulting in flawed air quality far-field, cumulative, and visibility analyses. The BLM did not extend the modeling domain far enough to encompass all sources that affect air quality in areas (e.g., Bridger Wilderness Area) also potentially affected by the JIDP.

The BLM inappropriately included only sources permitted between January 1, 2001, and June 30, 2003, in its cumulative emissions inventory, thus excluding the maximum drilling in the Pinedale area that has

characterized the last two years, rampant development in the Powder River Basin, and several large coal-fired power plants for Wyoming and Utah have been proposed and permits are in process.

The BLM analyzed only the *change* in emissions between 2001 and 2003 rather than analyzing actual emissions. This method results in many sources that are emitting the same level of emissions from year to year to be excluded from the analysis.

The BLM also excluded hundreds of sources with emissions less than 3 tons per year. The BLM's air quality analysis was deficient because it disregarded the pollutants from each well due to their small amount, thus ignoring the significant cumulative effect of multiple wells.

The BLM arbitrarily excluded all non-Wyoming emission sources in its required reasonable foreseeable development (RFD) determination, despite the fact such sources may impact the same areas as the JIDP. The BLM's exclusion of non-Wyoming sources is inconsistent with its "current inventory source" determination, which included sources from Utah, Colorado, and Idaho.

The BLM failed to adequately cite previous air quality analyses and information showing that air quality in Wyoming is already being significantly affected by current rates of oil and gas development in Wyoming.

The BLM must consider its actions in the context of already impaired air quality. Two years ago, with hundreds fewer wells in the Pinedale area than exist now, the BLM was considering closing the Jonah Field to the public due to harmful air emissions.

The BLM must acknowledge that not approving the JIDP (i.e., No Action) would *still* allow for visibility impairment of several Class I areas. Recent data, not cited in the DEIS, showed existing visibility impairment to Class I areas in the Bridger-Teton National Forest.

The BLM failed to acknowledge and reaffirm its NO_x tracking responsibility under the Pinedale Anticline Project Area Record of Decision (PAPA ROD), and failed to acknowledge that recently published data showed NO_x levels nearly triple the caps established in that ROD.

The BLM cannot use the Jonah cumulative air quality analysis to satisfy its PAPA ROD responsibility (because NO_x caps have been exceeded) to undergo a new air quality review.

The BLM failed to comply with NEPA by not adequately describing air quality mitigation measures for the JIDP. Mitigation measures are especially important because the BLM is approving the JIDP at a time when air quality values in the Pinedale area and beyond are already impaired.

The BLM could not identify proper mitigation measures because it failed to set a specific limit for well numbers. The BLM stated that if more gas is recoverable after 3,100 wells are completed, more wells would be allowed.

The BLM failed to consider mitigation measures such as limiting activities that contribute to emissions, requiring emission controls on sources, or requiring the offsetting of emissions to ensure the net emissions remain below applicable thresholds.

The BLM failed to consider the possibility of phased development in Jonah as a potential mitigation measure. Because visibility impairment is already occurring in Class I areas that will also be impacted by the JIDP, the BLM should analyze the possibility of delaying further development until current emission sources are completed and cease emitting pollutants.

The BLM failed to consider the possibility of a cap on certain emissions that would avoid further visibility impairment of Class I areas and acid deposition in sensitive watersheds. The cap on emissions increases would provide a threshold beyond which only offsets for new emissions would be allowed.

In order to allow the Wyoming Air Quality Division to provide the necessary management oversight, the BLM must incorporate analysis not previously completed within the Pinedale Field Office. This analysis must include a current inventory, a cogent monitoring network, a plan for how the monitoring will be analyzed, and a plan to modify management practices to adapt to changing circumstances.

Air Quality (Comments on Air Quality Supplemental Information)

Overestimation of Impacts

BLM's analysis is so overly conservative it is extremely unlikely the described potential air quality impacts will ever occur. The analysis does not factor in new emission reduction solutions, improving technology, acceleration up a learning curve, cooperation between stakeholders, and other key data. BLM did not disclose or explain the conservative nature of its analysis or inform the public that the Preferred Alternative High Emission Scenario is a "worst case" analysis that overstates the foreseeable impacts.

The statistical discipline in the report is weak and therefore the description of the potential outcomes is equally weak. The use of only conservative factors has a mathematically cumulative impact when they are used in sequential computations leading to overestimated impacts.

The results Operators are attaining in the Pinedale Anticline Project Area (PAPA) are far better than those forecasted by the JIDP Air Quality Impact Analysis and are more representative of what the JIDP operators will be attaining even without factoring in a number of future, favorable technological and economic factors. Improvements in actual versus estimated outcomes deserve more recognition.

The current EIS portrays a worst-case scenario, assuming that the area's Class I airshed is at risk. In reality, monitoring evidence at both Bridger Wilderness Area and Pinedale shows stable or improving air quality in Southwest Wyoming. Nitrogen oxide concentrations are stable or slightly improving and fall well below the national ambient air quality standards due to technological improvements and good natural gas development practices in the area. These demonstrated improvements indicate that the impacts from JIDP cannot be as significant as indicated in the DEIS and accompanying documents.

BLM's modeling used an exaggerated background ammonia concentration (1.0 ppb). Better data are available and should have been used. Monitoring data from the Clean Air Status and Trends Network ("CASTNET") station in Pinedale, Wyoming, indicates a long-term average of between 0.21–0.34 ppb for ammonia background levels. Inaccurate ammonia concentrations resulted in an overestimation of the impacts to visibility in Bridger Wilderness Area.

Project Emissions Inventory

The use of conservative EPA AP-42 emission factors overestimates rig emissions; manufacturers' emissions factors more accurately reflect drill rig emissions. Even given the use of EPA AP-42, emission factors from Section 3.4 of AP-42 (rather than Section 3.3) should have been used for the larger engines on the drill rigs. Rig emissions are overestimated by 29% solely as a result of this error.

The development scenarios do not assume the retirement of existing Tier 0 drilling rig engines in favor of Tier 1, 2 and 3 engines, natural gas engines, Selective Catalytic Reduction, or electric engines. Using Tier 0 emission levels in modeling overestimates NO_x emissions and does not reflect current EPA off-road diesel rules or the engines currently operating at Jonah Field. Manufacturers no longer produce engines

with Tier 0 and Tier 1 emissions levels, so new Tier 0 engines will not be available for use in 2017. Any existing Tier 0 engines will likely either have been retrofitted or replaced long before 2017.

New regulatory initiatives will take effect during the lifetime of the project; off-road engines will become cleaner from 2005 to 2017, which will result in fewer emissions than predicted, particularly with respect to the cumulative analyses. Many of the sources considered in the background concentration and as part of the cumulative analyses will be retrofitted with Best Available Retrofit Technology (“BART”) under the Regional Haze rule, or retired, and will not be active for the entire life of JIDP. An appropriate estimation of these factors would eliminate the number of days of predicted visibility impacts.

Ultra-low sulfur diesel regulations that will be in effect in 2010 are not included in the modeling of 2017 emissions. Using the higher sulfur content (500 ppm versus 15 ppm) in modeling for Year 2010 and beyond results in overestimating SO₂ emissions and Acid Neutralizing Capacity values.

The analysis overstated engine usage. More representative engine usage data for a single drilling rig would reduce annualized emissions from 120.5 tons/year to 48.3 tons/year, and reduce cumulative annualized emissions from 640 tons/year to 285 tons/year. Peak visibility impacts from drilling engines would be reduced, as would the number of days when projected visibility impacts exceed 1.0 dv.

The assumption of 60 drilling days per well on the Pinedale Anticline overestimates emissions. SEPCo typically requires less than 40 days to drill a well, not 60. The total Pinedale Anticline Project contribution to cumulative emissions is thus overstated.

Flaring emissions appear to be greatly overstated. Extended durations of flaring events, high frequency rates for flaring, and high volumes of gas flared were assumed in completion flare emission calculations. This approach ignores the new restrictions placed by the WDEQ on flaring operations. The emission reductions from green (flareless flowback) completions were not taken into account.

BLM’s Preferred Alternative assumed 50% directional drilling and 50% vertical drilling. BLM’s own modeling demonstrates that directional drilling results in greater ambient air impacts than vertical drilling, as much as 25% more. Directional drilling results in longer drilling times, larger drilling rig engines, and more vehicular traffic. BLM should adopt primarily vertical drilling in the FEIS and ROD.

The project totals in the Proposed Action and Preferred Alternative are end-of-project emissions and inherently assume that the emission totals increase instantly. However, there would realistically be a gradual increase in emissions over time.

Underestimation of Impacts

There are deficiencies in the JIDP inventory and regional inventories, as well as the modeling done for direct project PM₁₀ and NO₂ impacts, such that BLM’s analysis underestimates the impacts. A proper analysis may show that the level of development allowed under the Preferred Alternative could directly cause Class II PM₁₀ increment violations within JIDPA under all modeling scenarios.

A background ammonia concentration of 1.0 ppb was assumed for the CALPUFF modeling of PM and visibility impacts, based on IWAQM Phase 2 guidance for arid lands; however, it may have been more valid to use the 10.0 ppb value for grasslands. Measured ammonia levels in southwestern Wyoming tend to be much higher than those in other parts of the Interior West. Undercounting background ammonia concentrations results in understating far-field concentrations of PM₁₀ and PM_{2.5} and visibility impacts to Class I and sensitive Class II areas.

BLM relied on ambient air monitoring data to reflect all sources in existence as of 2001 rather than modeling the existing sources to more accurately determine background concentrations. However, BLM provided no analysis or verification that the monitoring data used accurately reflect maximum background concentrations of pollutants in the JIDP region or in the Class I areas of concern. BLM has not determined whether more representative and/or more current monitoring data are available. Monitoring data collected in Cheyenne, Wyoming, were used to reflect the background concentrations of PM₁₀ and PM_{2.5}. This choice is particularly questionable given that a State and Local Air Monitoring Site (SLAMS) is located much closer to the JIDPA in Rock Springs, Wyoming. Given that modeling shows significantly elevated PM₁₀ impacts, it is imperative that BLM use truly representative data. BLM also relied on NO₂ and O₃ data collected at the Green River monitoring site in 2001 without providing any information to indicate that this site reflects the maximum NO₂ and O₃ concentrations for the region.

Project Emissions Inventory

The emissions inventory underestimates the total emissions due to JIDP sources alone by failing to evaluate the increased size of drill rigs shown to be necessary in nearby natural gas project areas. The original Pinedale Anticline EIS assumed only 8 drill rigs would operate at one time; however, 32 drill rigs were operating in the summer of 2004. That EIS also assumed a single drill rig would require 1,000 horsepower (hp); now it is estimated that a single drill rig in the area is 3,000–5,000 hp. In the Jonah II field, the drill rig sizes have been 2.5 times the 1,000 hp assumed in the Jonah II EIS. BLM must be conservative in its estimate of emissions in the JIDP EIS to avoid making a similar mistake.

The 2017 emission inventory assumed 50% of the drill rigs would meet Tier 1 emission rates and 50% would meet Tier 2 emission rates. However, EPA's regulations for non-road diesel engines does not require that engines manufactured before certain dates meet Tier 1 and, later, Tier 2 emission standards. Nothing prohibits the operation of non-road engines that do not meet those standards if they are built before those deadlines, unless BLM and/or WDEQ mandate otherwise.

The modeling analyses assume completion flares on only 20% of wells and that they will all be equipped with smokeless flares, but no justification is provided to support that claim. BLM's assumption is not justified without being identified as a mitigation measure enforceable by BLM or the WDEQ.

No maximum short-term average emission inventory was developed for modeling compliance with standards with shorter than annual averaging times, such as the 24-hour PM₁₀ and PM_{2.5} NAAQS, PM₁₀ PSD increments, and the visibility standard. Only summaries of annual emissions are provided, and the models were apparently run based on an even distribution of emissions over the year. Because more drilling occurs in the summer months than in the winter months, more than the assumed 20 drilling rigs are likely to be operating in some months, as well as more road and well pad construction activities.

Drilling emissions have been underestimated because of the assumption that all drill rigs will operate for 23 days/well, when well drilling and completion can take as long as 36 days. BLM should have used the more conservative estimate of 36 days for drilling in a maximum short-term emissions inventory to assess worst-case impacts on the short-term average NAAQS, PSD increments, and visibility standards.

The 2017 project inventory assumes a 50% control rate (the maximum possible) in fugitive dust emissions due to road wetting. It is not a reasonable assumption that the particulate emissions from roads will be controlled to the maximum extent possible unless BLM and/or the WDEQ imposes a 50% reduction requirement as an enforceable measure. No such commitment has been made to date.

Separator heater emissions used in production may have been greatly underestimated because it was assumed that these heaters only operate for 7.5 minutes every hour during September through April.

Other EIS air analyses have assumed separator heaters would operate for 15.0 minutes per hour. No basis was provided by BLM to justify this discrepancy.

It appears that BLM underestimated compression needed for the JIDP because 48,000 hp of expanded compression was used in EPDS modeling beyond that evaluated for the preferred alternative in the JIDPA alone (EPDS modeling assumed almost 300 tpy of additional NO_x emissions from JIDP compressors). Considering that the compressor engines are one of the most significant sources of NO_x emissions associated with production, BLM should provide more detail on the assumptions used and ensure that modeling include the maximum level of increased compression expected.

Regional Emissions Inventory

Despite NEPA requirements, the best available data were not used to estimate regional baseline emissions. Instead of using 2002 actual emissions, which are available through WDEQ's Wyoming Inventory System for Emissions (WISE), the analysis uses "changes in potential emissions" as reported in WDEQ's Southwest Wyoming Emissions Tracking Report and submitted to the Wyoming BLM.

The area inventoried was not large enough to encompass all sources that might impact the areas potentially affected by JIDP. For assessing near-field impacts, the area inventoried must at least include all sources within 50 km of the significant ambient impact area, as well as large sources such as coal-fired power plants up to 300 km away, that could have a significant ambient impact on the JIDP area. For the far-field analysis, the regional inventory area must extend out to 300 km from all Class I areas that could be impacted by the JIDP (all Class I areas in Wyoming).

The regional inventory did not consider all reasonably foreseeable sources that could significantly impact the same areas potentially affected by JIDP sources. Omissions include sources recently permitted (after June 30, 2003) or that have recently submitted complete PSD permit applications but which are not yet operating. BLM should have included all expected emissions from projects currently being developed in Wyoming and from reasonably foreseeable development (RFD) outside Wyoming. Emissions from projects currently being developed (particularly the Pinedale Anticline Project) were underestimated.

No emissions data were quantified or emissions data were incomplete for several NEPA projects in Wyoming, and the regional inventory failed to include NEPA projects in states other than Wyoming that could be impacting the same area as the JIDP sources, such as the Vernal (Utah) sources, the Price (Utah) RMP sources, the Roan Plateau (Colorado) RMP sources, projects in the Moffat County, Colorado, area (Little Snake Field Office), and the Powder River Basin (Montana) coalbed methane sources.

All sources with emissions less than 3 tpy (360 sources, mostly production wells and mostly in Sweetwater or Sublette Counties) were excluded from the Wyoming inventory. Collectively, these facilities represent significant emissions and must not be excluded from the inventory.

The permitted source inventory appears to give credit for recently permitted emission reductions that have occurred or will occur in the near future. If BLM has no data on the actual emission reductions that have occurred at these sources, then the permitted reductions must not be considered in the RFFA inventory.

Near-Field Modeling

Near-field impact modeling of the Preferred Alternative is deficient because of reliance on PM₁₀ and PM_{2.5} data collected in Cheyenne, Wyoming, to represent background concentrations for these pollutants, and reliance on data that are more than 20 years old to represent background concentrations of SO₂.

While it is not clear how the near-field modeling was performed for the AQTSD Supplement, the single-well pad modeling scenarios described could result in a significant underestimate of near-field concentrations if plumes from multiple pads overlap.

The description of the meteorological inputs used with AERMOD is deficient in that it omits discussion of data sources or assumptions for the terrain and roughness height data used in the model. Inaccurate specification of this parameter can lead to drastic underestimation of concentrations.

It appears that only emissions from production (well site and compression) were modeled for the near-field NO₂ impacts. However, a review of the emission inventory data for the DEIS generally shows much higher NO_x emissions from construction than from production.

BLM should have placed fine-gridded receptors near modeled drill rig emission sources sufficient to capture maximum concentrations from a drill rig, including the overlap of emission impacts from other drill rigs and compressors in the area. Failure to do this contributed to underestimated ambient air impacts in the NO₂ near-field assessment.

Mid-/Far-Field Modeling

While the 2004 Draft AQTSD provides no information whatsoever on the far-field ozone impacts of VOC, NO_x, and CO emissions from the JIDP and other existing or reasonably foreseeable sources in the region, the analysis of near-field ozone impacts suggests that far-field effects on ozone could also be highly significant. Ozone and its precursors can be transported hundreds of miles, so areas far downwind of the Jonah Field may be affected by its VOC, NO_x, and CO emissions.

Far-field air quality modeling only used 1 year of meteorological data (from 1995). However, common practice and EPA's Guideline on Air Quality Models requires use of at least 3 years of mesoscale meteorological data or 5 years of National Weather Service (or comparable) data when evaluating long-range transport of air emissions. BLM's far-field air quality analysis does not meet current standards, and there is no assurance that BLM's analysis represents the worst case meteorological conditions.

The use of the IKINE switch in the CALPUFF model used for far-field modeling distorts wind speeds and wind directions, resulting in an unrealistic and significant increase in the predicted project-related visibility impairment for the Bridger Wilderness Area and elsewhere.

A published analysis using meteorological data collected within the Jonah field raises questions regarding the accuracy of the CALMET-generated wind field. Winds aloft and attendant mixing dynamics cannot be claimed to be receiving accurate model treatment on the basis of values interpolated between Riverton and Salt Lake, the two nearest upper atmosphere sounding locations. More representative data for regional wind speed and wind direction are needed. Comparison of a modeled wind rose for the Jonah Field to a measured wind rose in the Jonah Field indicates substantial differences in both wind speed and direction. Inaccuracy in wind direction affects how frequently emissions from the Jonah Field are transported to adjacent Class I areas in the model, while inaccuracy in wind speed affects the dilution of emissions and the rate of reactions of various chemical species.

The standard for visibility impairment in Class I areas should be 0.5 deciviews (dv), not 1.0 dv. The U.S. Forest Service and National Park Service use a 0.5 dv change as their threshold for identifying visibility impairment, and the Class I and sensitive Class II areas of concern are under their management. In EPA's regional haze regulations, states must consider a change of 0.5 dv as indicating that a source contributes to visibility impairment for purposes of determining Best Available Retrofit Technology applicability.

Use of 1.0 dv change as the just noticeable threshold adds another level of conservatism to the impacts predicted by BLM's modeling because scientific evidences exists indicating that a 1.0 dv change is in fact never noticeable.

BLM modeling did not account for precipitation events such as snow and rain, or other weather events that cause significant impacts to visibility on numerous days throughout the year. In effect, BLM modeling assumes that days where snow or rain or fog impacts visibility were caused by JIDP, which contributes to the "worst case" results.

The modeling assumptions from the IKINE setting, the ammonia background concentration, and the lack of accounting for precipitation events result in a significant overestimation of the visibility impacts from JIDP. Remodeling of the Proposed Action by CH2Mhill, with each of these assumptions corrected, reduces visibility impacts at Bridger Wilderness Area from 9 days above 1.0 dv change to a single day above 1.0 dv change. Mitigation can eliminate all JIDP potential air quality impacts.

Previous modeling indicates that oil and gas projects like JIDP are not the primary sources of visibility impacts in the Bridger-Fitzpatrick Class I areas. Sulfur compounds are the largest component of visibility impairment, and JIDP mainly emits nitrogen oxides (NO_x), which ultimately contribute only 4.5% to haze in Bridger Wilderness Area. Sources from outside Wyoming cause most of the haze.

In modeling visibility impacts to regional communities, BLM used baseline data from Class I areas (clean, pristine environments) instead of representing actual visibility levels in areas that have considerable mobile source emissions (vehicles), wood-burning stoves, and other locally produced, visibility-impacting sources. As a result, BLM significantly underestimated the baseline visibility levels in these communities, which in turn caused an overstatement of the visibility impacts of JIDP.

The use of reported IMPROVE concentrations less than the "natural conditions" defined by Federal Land Managers' Air Quality-related Values Workgroup (FLAG) serves no practical purpose. The use of these lower concentrations ignores the uncertainty associated with the IMPROVE concentration measurements. The use of these values simply exaggerates the projected impacts.

BLM identified acid rain impacts but did not disclose the significance of those impacts. BLM's modeling used outdated criteria now considered inadequate to protect lakes from adverse impacts.

Ozone and VOCs

The regional source inventory did not include volatile organic compound (VOC) emissions in the region, and those emissions can be quite significant. No analysis of increased VOC emissions or the impacts of NO_x and VOC emissions on the ozone NAAQS was done as part of the EPDS assessment. Considering the already high levels of ozone that have been monitored in the region, this was a major oversight.

Waiting for the FEIS to report on VOC modeling and corresponding ozone impacts is unacceptable; exceedances have occurred at the 8-hour ozone standard at the Farson and Boulder monitoring sites in and near the Jonah Field. Failure to report on VOC impacts before the FEIS precludes the public from the opportunity to submit meaningful comments on this extremely critical aspect of the air quality analysis.

The 2004 AQTSD uses outdated and inadequate methodology (Scheffe 1988) to estimate ozone impacts, rather than a model (such as CAMx or CAMQ) approved by EPA for this application. Even with BLM's flawed assumptions, the predicted ozone concentration is 98% of the ozone NAAQS. It is imperative that BLM conduct a proper assessment of the ozone impacts to fully disclose the extent of likely ozone NAAQS violations in the region.

BLM's ozone analysis likely underestimated ambient impacts because it excluded NO_x and VOC emissions from construction and from other sources in the region; the analysis was based only on a "patch" of 128 wells and one compressor engine, a fraction of the full development that could be allowed under the JIDP; and it seems likely that use of the Green River monitoring site does not reflect maximum ozone concentrations in the JIDP area.

If the Draft AQTSD is even close to correct, the VOC emissions associated with JIDP would nearly double the 66,000 tons/year of VOC emissions that EPA estimates were released from all sources in the entire State of Wyoming in 1999. Given this dramatic increase in VOC emissions, BLM cannot claim to have done a comprehensive air quality assessment unless cumulative ozone impacts of emissions from this and other nearby oil and gas projects are modeled using modern approaches and tools.

PSD Increment-Consumption Analysis

When WDEQ's recently released report on NO₂ increment consumption in Sublette County is considered with the modeled JIDP impacts for both the Preferred Alternative and the EPDS scenario, the result is that NO₂ increment violations will occur without significant required mitigation measures. There is even greater likelihood of NO₂ increment violations considering the flaws in BLM's JIDP emission inventory and modeling as well as the significant underestimate of remaining Pinedale Anticline air emissions.

BLM cannot rely on State Implementation Plan (SIP) programs to conduct a full PSD increment-consumption analysis because BLM is required under FLPMA to ensure compliance with all regulatory requirements and because PSD increments are separate ambient standards not to be exceeded (as defined in §163 of the Clean Air Act). In addition, BLM has no assurance that the State will perform a complete increment consumption analysis before BLM revises the RMP and issues other approvals that may cause increments to be violated. Where the State has performed an increment consumption analysis, BLM must disclose the results and may adopt the analysis as part of the NEPA analysis of increment consumption provided that BLM independently determines that the analysis satisfies applicable NEPA requirements.

BLM's modeling approach provides only a highly truncated assessment of increment consumption during the 3 years (post 2002) for which new emissions sources were considered. BLM must develop a regional emissions inventory, separate from the one used in the NAAQS analysis, that includes emissions from all new and modified sources added after the regulatory PSD baseline dates (1979 for PM, 1988 for NO₂). This is needed to assess whether the additional air emissions sources allowed under JIDP would cause or contribute to a violation of any PSD increment in any area or cause or contribute to an adverse cumulative impact on visibility at any of the Class I areas. A more comprehensive inventory is required to perform competent modeling of both the near- and far-field impacts of the JIDP and other existing and reasonably foreseeable development for BLM to fulfill the requirements of NEPA and FLPMA. It is particularly important if available monitoring data cannot be shown to adequately reflect all existing sources.

Early Project Development Stage (EPDS) Modeling

The EPDS Modeling does not appropriately describe the state of affairs for the year 2006. For its EPDS modeling, BLM assumed, with no justification, that four uncompleted and unapproved NEPA projects (JIDP and the Pinedale Anticline, South Piney, Riley Ridge, and Jack Morrow Hills Projects) will show maximum emissions of air pollutants in 2006. This is inconsistent with the 2017 modeling emissions inventory, which included NEPA projects only if NEPA analysis had been completed and the project approved. The EPDS appears to have almost nothing to do with the JIDP (the nominal purpose and need of this NEPA analysis), rather it appears to be part of the NEPA compliance needed for other projects.

Many of the background sources included in the EPDS regional emissions inventory regional, particularly those recently permitted by the State, will not be operational by 2006 due to procedural and litigation delays. Furthermore, regardless of the year chosen for the emissions calculation, many of the operators of these projects will have incorporated new technologies and/or in many cases, will be required to meet new regulations. Estimated emissions from previously approved projects will be or already have been considerably reduced, indicating that impacts from the EPDS modeling are considerably overestimated.

Whether the EPDS analysis was done as part of the JIDP EIS, or a need to supplement the Pinedale Anticline EIS or the Pinedale RMP revision, or all of these, it is deficient. The EPDS emission inventory underestimated the likely emissions that will occur in the region in 2006. First, it was assumed that only 20 drill rigs would operate each month on the JIDP even though the well development rate would be 250/year; thus, emissions from 10 wells were left out of the inventory. Second, several assumptions on limiting emissions were made that may or may not bear true without an enforceable requirement on such emission limitations. Third, BLM assumed that drill rig sizes in the JIDP area would be roughly 2,100–2,600 hp, probably an underestimate given that, in the adjacent Pinedale Anticline field, significantly larger drill rig engines have been used. Fourth, the inventory did not include emissions from production or from construction/production-related traffic for other gas projects in the region. Last, the permitted source inventory was updated to include all sources permitted as of March 31, 2004, although a WDEQ report reflecting all emissions changes in the region as of October 31, 2004, was available.

Several sources listed in the RFFA inventory for the DEIS modeling were not included in the EPDS modeling (or lower emissions were listed). This discrepancy was not explained.

Several deficiencies in the emission inventories assumed for the DEIS and Preferred Alternative modeling also apply to the EPDS 2006 inventory, including failure to develop a maximum short-term emissions inventory for modeling compliance with short-term ambient air standards and the visibility standard; failure to develop a complete PSD increment-consuming inventory; failure to include recently proposed and permitted power plants in the region; failure to include VOC emissions from all sources; failure to inventory sources with emissions less than 3 tpy; underestimation of emissions from WOGCC sources; underestimation of emissions from NEPA projects; and failure to extend the regional inventory far enough to encompass all contributing sources. If BLM were to prepare a complete increment-consuming inventory and address all other deficiencies in the inventory listed above, the impacts on the PSD increment and visibility in Class I areas expected by 2006 would likely be much worse.

Although BLM chose 2002 as the study base year for the EPDS modeling, they used 2001 monitoring data (1982–1983 data for SO₂), assuming that emissions from oil and gas development in 2002 were reflected in those earlier data. Considering the exponential growth of gas drilling in the area, this is an incredibly flawed assumption. If BLM cannot verify that the monitoring data reflect all existing source emissions (and surely the 2001 monitoring data does not reflect all emissions existing in 2002), then it must model all existing sources in the NAAQS/WAAQS analysis.

1996 is a much more appropriate year than 2002 to use as a base year for the EPDS modeling. If the purpose of this analysis is to serve as a supplemental analysis because regional emissions have exceeded the NO_x level of concern identified in the Pinedale Anticline ROD, then BLM should have assessed all emission increases that have—or will—occur since the monitoring base year date used in the Pinedale Anticline air analysis of January 1, 1996.

The basis for emission calculations used for drill rigs in the TSD is unclear. It would be very helpful for the TSD to provide data on the number of drill rigs that were operational so that impacts could be correlated with the IMPROVE monitoring data.

Air Quality Health Impacts

The JIDP DEIS and support documents appear to say that under some scenarios a recognized acceptable level of cancer rates may be exceeded. Any such exceedances need to be clearly disclosed and explained. No baseline data for potentially carcinogenic chemicals are provided to determine background exposure levels. Cancer risks associated with formaldehyde are underestimated because only primary formaldehyde emissions are addressed, not the contribution of other JIDP-generated VOCs to the formation of secondary formaldehyde in the atmosphere. Cancer risks associated with diesel exhaust emissions from oil and gas development, which may be highly significant, were neglected.

Given the potentially severe adverse health effects associated with fine particle exposures, BLM should fully assess the potential adverse public health effects associated with cumulative emissions of fine particles and fine particle precursors from the current and proposed sources.

Air Quality Impacts Mitigation

Given the conservative nature of the modeling, it is not appropriate for BLM to impose additional mitigation strategies at this time. Exaggerated modeling assumptions resulted in a significant overestimation of visibility impacts that BLM should discuss, analyze, and resolve in the FEIS before implementing or recommending any measures to mitigate the overrated impacts, and before issuing the record of decision (ROD).

Uncertainties in actual concentrations of pollutants and impacts make fixed, final, and restrictive mitigation strategies, both short term (2006) and longer term, seem untenable. Performance standards can be established in cooperation with operators that will lead to more effective, more meaningful, and more realistic emission control.

BLM modeling, unfortunately, uses the results and assumptions from the “worst case” High Emissions Scenario to develop mitigation. This scenario is not “reasonably foreseeable,” so the starting point for mitigation is improper. The FEIS should include an array of mitigation approaches to realistic project alternatives, i.e. the Proposed Action and Preferred Alternative Low Emissions Scenario.

WDEQ, not BLM, should be charged with developing and implementing air quality mitigation for the project, be it on federal, state, or private lands. Ongoing air quality monitoring in the area and WDEQ’s extensive emission inventory process and air quality model should be considered primary components of mitigation strategies and should be utilized before other arbitrary mitigation steps are proposed.

Mitigation must provide a level playing field for all drilling rigs in Southwest Wyoming, be based on cost effective analysis of potential control options, and must follow the appropriate regulatory rule development process. Mitigation measures should be framed in terms that allow flexibility to the operator to meet the requirements in the ROD.

EPDS modeling does not evidence the need for phased development to mitigate impacts to visibility. The benefits would not outweigh the costs. Phased development would significantly delay the ability of the Operators to assist in meeting the demands of this nation for a clean, reliable, and domestic energy source during a time of high demand. It would hinder employment and growth in the region, harming the economy of the West and Wyoming in particular. Smaller and medium-sized producers would be at a disadvantage, as the extended costs and delayed benefits of phased development may be too difficult for them to overcome. If BLM chooses to phase development below the 16,000 acres full development drilling, BLM must prepare a Statement of Adverse Energy Impact pursuant to the Executive Order.

In light of the adverse impacts predicted to occur as a result of JIDP, both alone and in combination with other sources, and the fact that the extent and magnitude of the adverse impacts are likely underestimated, BLM must develop a mitigation plan that demonstrates compliance with all Clean Air Act (CAA) standards. Mitigation is not limited to emission reduction strategies for air emissions sources; it may also include avoiding impact altogether by not taking a certain action or parts of an action, minimizing impacts by limiting the magnitude of an action, and reducing or eliminating the impact over the life of the action.

BLM did not model any scenario that would “provide for compliance with” all applicable standards under the CAA. While the 80% reduction scenario achieves the lowest impacts of any alternative considered, it nonetheless predicts 19 or 21 days of visibility impairment in the Bridger class I area. This level of impairment fails to satisfy the statutory requirement for “no degradation” of humanly perceptible visibility in the Class I area. Additional reductions will be needed, such as those that can be achieved by reducing the well drilling rate through the implementation of phased development.

The AQ Supplement is non-definitive about what mitigation will be used to avoid or eliminate adverse air quality impacts and who would undertake those measures. The modeled mitigation options are presented as “examples” not commitments. BLM claims it may not even be able to implement some mitigation measures. The JIDP DEIS itself mentions (but does not analyze) only vague possibilities to mitigate impacts, and no definitive regulatory role for the State is described. BLM must adopt measures that are both sufficient to provide for compliance with the CAA, and enforceable directly by BLM or by an enforceable agreement with the State to meet its obligations under the FLPMA, NEPA and the CAA.

BLM should mandate use of Best Available Control Technology (BACT) rather than simply suggesting its use. The EIS should better detail the steps to be taken, and the penalties if any, in the cases of high haze situations at Grand Teton and Yellowstone National Parks resulting from its permitting actions.

Air Quality Regulatory Compliance and Commitments

BLM is preparing to unleash widespread deterioration of the regional environment in violation of numerous legal standards through the oil and gas development it proposes to authorize and even promote. BLM’s disregard for the adverse air quality effects is at odds with NEPA regulations, which state that federal agencies “shall to the fullest extent possible use all practical means. . . [to] avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.” It also conflicts with FLPMA, which requires land use plans to “provide for compliance with applicable pollution control laws,” and with BLM’s own planning criteria that actions must comply with federal laws and regulations. The DEIS and AQ Supplement fail to implement EPA’s “no degradation” policy under the CAA.

At a minimum, the JIDP DEIS and AQ Supplement must be revised to provide a specific accounting as to what the effects of this project will be on the State of Wyoming’s ability to submit an approvable State Implementation Plan (SIP) to EPA, and for the standards specified in EPA regulations (the regional haze rule at 40 CFR §§ 51.308 and 309) to actually be met.

The NEPA documents appear to intentionally mislead the public and the decision maker by including tables that purport to summarize adverse impacts reported in the TSD, but which instead indicate in green ink that there will not be violations of PSD increments—in marked conflict with the modeling results reported in the TSD. The PSD increments appear to be considered second class CAA requirements by BLM; yet BLM is required under FLPMA to comply with all CAA requirements (including §163) and may not authorize an action that would allow the PSD increments to be exceeded.

BLM may not rely on prior inadequate EISs. The Final EISs issued for the Pinedale Anticline, Continental Divide/Wamsutter, Desolation Flats, Jack Morrow Hills, and Rawlins RMP were all seriously

deficient in their consideration of cumulative air quality impacts, and may not be relied upon as the basis for approving further development, including permits issued for drilling pads, road construction, compressor stations and other polluting activities reviewed in the earlier environmental documents.

Alternatives

[Only comments expressly favoring or opposing an alternative are represented here; concerns over the impacts of additional drilling not linked to a specific alternative or alternatives are represented in other sections of this document.]

I (we) support the Preferred Alternative because I (we) believe:

- The Preferred Alternative would result in less surface disturbance and less overall adverse impact to natural resources than the Proposed Action.
- Compared to the Proposed Action, the Preferred Alternative would produce roughly the same tax and mineral royalty revenue because mineral royalties are based on total production, not the number of vertical wells drilled.
- Compared to the Proposed Action, the Preferred Alternative would give livestock permittees a better chance of maintaining current grazing programs.

I (we) do *not* support the Preferred Alternative because I (we) believe:

- The Preferred Alternative does not provide as many local, regional, and national economic and social benefits as the Proposed Action.
- The Preferred Alternative wastes much-needed natural gas in the JIDPA, while not significantly reducing adverse impacts. The gas left behind may not be recoverable. Wasting gas contradicts BLM's multiple use goals.
- The Preferred Alternative imposes far too many unnecessary, inappropriate, impractical, and at times illegal restrictions on the Operators.
- The Preferred Alternative requires more directional drilling than is economically or technically reasonable, or, in some cases, feasible. Directional drilling increases costs for the Operators, wastes natural gas, and results in more air pollution and truck traffic than straight-hole wells.
- The Preferred Alternative allows too many well pads, too much surface disturbance, and too many adverse impacts to wildlife and habitat. The Preferred Alternative does not incorporate directional drilling to the extent it should to reduce surface disturbance impacts.
- The Preferred Alternative fails to provide adequate mitigation given the extreme density of development proposed for the JIDPA and the level of impact that would result. The Preferred Alternative fails to make a concrete commitment of resources for compensatory mitigation for impacts to wildlife.
- The Preferred Alternative is inconsistent with state plans and policies regarding wildlife.

I (we) support the Proposed Action because I (we) believe:

- The Proposed Action benefits the local economy, providing stable, long-term jobs and income for workers and their families and other residents in the area. The Proposed Action also benefits the state, regional, and national economies.
- The Proposed Action enhances tax revenues, which improves local tax-supported services such as schools.
- The Proposed Action maximizes royalty revenues for the BLM.
- The Proposed Action maximizes the recovery of the natural gas resource in the JIDPA, a world-class natural gas reserve, while keeping environmental impacts to an acceptable level. Maximizing the recovery of natural gas helps to meet the national demand for energy, may help lower energy costs, and reduces the United States' dependence on foreign sources of energy (and all the economic, political, and social negatives associated with that, including war).
- The Proposed Action benefits Wyoming and the nation environmentally by recovering the maximum amount of clean-burning natural gas.
- The Proposed Action with compensatory mitigation would result in fewer adverse resource impacts (particularly to air quality) than the Preferred Alternative. The land would be reclaimed, and restored forage would be superior to predevelopment conditions.
- While the Proposed Action would result in adverse environmental impacts, these impacts are insignificant, taking up only a small part of total sagebrush/sage-grouse habitat in Wyoming, and worth the tradeoff for the socioeconomic advantages the Proposed Action would provide.
- The Proposed Action confines additional impacts to an area already disturbed, and, for the most part, the infrastructure to produce and transport the additional gas is already in place.
- If the Proposed Action is not selected, the energy will have to come from some other place, possibly more fragile than the Jonah Field. Recovering a comparable amount of gas elsewhere would result in five times more surface disturbance because Jonah Field contains 25 times more gas per acre than other fields in southwestern Wyoming.

I (we) do *not* support the Proposed Action because I (we) believe:

- The Proposed Action would continue to increase adverse impacts on wildlife from oil and gas development in the area. With the extensive loss of habitat, wildlife would be driven from the JIDPA.
- The Proposed Action would result in well density so high that well pads and associated development would be visible from every place within the well field.
- The Proposed Action would push the limits of BLM's multiple use policy, as it would be the dominant use of public lands in the Jonah area.

I (we) support Alternative B (Minimize Surface Disturbance) because I (we) believe:

- Alternative B would allow increased production on the field, while minimizing impact on wildlife habitat.

I (we) do *not* support Alternative B (Minimize Surface Disturbance) because I (we) believe:

- Alternative B is economically infeasible and may be technically impossible to drill some of the distances required.
- Alternative B results in the most adverse air quality impacts because directional drilling results in significantly more air emissions than will straight-hole drilling.

I (we) *not* support Alternatives A, B, C, D, E, and F because I (we) believe:

- These alternatives are impractical and uneconomic and therefore do not meet the purpose and need for the project.

I (we) support the No Action Alternative because I (we) believe:

- Additional gas drilling further promotes the boom and bust economic cycling that has afflicted western Wyoming; discourages diversification; and impairs the resources and activities, including ranching and tourism, vital to a mature, complex economy and the long-term well-being of this area.
- The gas industry is destroying our rural way of life and our once small ranching community. Taxes are increasing, community services and infrastructure are overextended, schools are overcrowded, and housing shortages, living costs, heavy traffic, drugs, and crime are growing problems.
- Additional drilling will turn an already scarred landscape into a well wasteland. The Jonah Field should not be allowed to become a national sacrificial area.
- The No Action Alternative is the best option for the protection of wildlife, air quality, and water quality, including water quality in alpine and sub-alpine lakes in the Wind Rivers. The negative effects to wildlife and air quality from the existing project are greater than anticipated in previous NEPA documents; no additional impacts should be allowed.
- No additional drilling should be permitted until further research is done to ensure the protection of wildlife migration routes.
- Additional drilling in the Jonah Field will combine with increased development in nearby fields to result in unacceptable cumulative impacts in the region.

The BLM should allow the pace of development to be determined by market conditions, not agency mandates.

The BLM should adopt the Proposed Action, enabling Operators to incorporate a quick pace of development and corresponding reclamation would more than offset any surface disturbance issues. The Proposed Action coincides with the BLM's dictum: *the quicker the project is implemented, the shorter the duration of impacts.*

EPA believes that BLM could present additional alternatives that would control the rate of development and the geographic focus of additional infill.

The BLM should slow the development of the Jonah Field and require more protection for the land, wildlife, water, and air quality. If the pace is slowed down and the existing well pads are used efficiently by employing newer technologies for recovery, then Sublette County will be able to rely on the long-term natural resources, other than gas, for which the area has become famous.

The BLM should slow the development of the Jonah Field so good practices and better science can be applied to this project. The BLM is understaffed and does not seem to be able to monitor the existing project level, let alone be able to keep a handle on expanded drilling in the Jonah.

The BLM should keep with the original plan (No Action Alternative) so that drilling can proceed within previously well-researched parameters. Then, revisit the whole project in 5 more years when there has been time to assess the damage that has been done. By that time, the price of oil will be even higher, and gas reserves will stay in storage just fine where they are, for the next generation.

Analysis

The BLM has effectively disenfranchised the majority of the public by producing a DEIS that is so encyclopedic, complex, and confusing that almost no one will read the entire document, and those who do read it won't fully grasp the analyses or implications of the alternatives, especially the Preferred Alternative.

The BLM should add a chapter in the FEIS dedicated to showing the preliminary research and monitoring results the BLM relied upon to reach its conclusion that significant adverse impacts to many area resources have already occurred with *existing* development and mitigation requirements. The BLM should incorporate a discussion of other oil and gas developments and include the success of those developments *with existing standard practices* to protect resources and rehabilitate the land.

The BLM must delete any references to the unquantified "potentially lower" impacts associated with the Preferred Alternative throughout the EIS because the BLM has not reasonably justified such assertions. The additional mitigation measures applied to the Preferred Alternative to minimize impacts are often presented in resource analysis sections (Chapter 4) as a justification for fewer adverse impacts under the Preferred Alternative. However, Appendix B ("Operator-Committed Practices") lists 38 mitigation measures applicable to the Proposed Action, and Chapter 5 lists 57 mitigation measures applicable to any or all alternatives. It appears that these measures, combined with other mitigation (transportation plan, reclamation plan, and other provisions in Appendix G), would be equally effective as the incremental measures proposed for the Preferred Alternative.

The BLM must clarify the confusion over the numbers of well pads, acres of disturbance, and well spacing throughout the document. It is frequently not clear what is being analyzed or what will be permitted.

The analysis and conclusions in the DEIS concerning reductions in recoverable reserves due to directional drilling are grossly inaccurate. The DEIS concludes that each of the Alternatives evaluated would result in unrecovered gas volumes proportional to the percentage of directional wells. The claim in the DEIS that increased costs of directional drilling and a frequent inability to drill and case the lower 1,000 feet of Lance formation would cause a loss of up to 36% of the gas reserves that would otherwise be recoverable under the Proposed Action is statistically impossible. In no case could these two factors result in a loss of more than about 6.5% and even that number is a significant stretch.

Compensatory Mitigation

The BLM should consider providing compensatory mitigation concurrent with development. The development should progress in such a way as to look for habitat improvements that could be made concurrently with development on nearby land.

A better approach than the Preferred Alternative would be to incorporate compensatory (off-site) mitigation.

With the existing level of development on the Jonah Field, the impacts should be mitigated through compensatory (off-site) mitigation to replace wildlife habitat function currently lost. The additional level of development proposed in the DEIS for the JIDP adds considerable support for the need for off-site mitigation of wildlife impacts.

The Wyoming Game and Fish Department (WGFD) recommends an initial off-site mitigation approach of habitat improvements adjacent to the project area at a rate of 3:1 (3 acres of mitigation: 1 acre of disturbance). The JIDP ROD should allow for adjusting the mitigation ratio through the life of the project as the ratio becomes better defined.

If possible, off-site mitigation should begin prior to foreseeable development impacts, as this would reduce the lag time between impacts to habitat and the availability of additional mitigation habitat, thus reducing impacts to wildlife through time.

The concept of compensatory mitigation is undesirable because it could disrupt the traditional processes for permitting oil and gas operations on public and private land. If applied to JIDP, it could be applied to other areas, with the risk of compensatory mitigation becoming the paramount approach to mitigation.

The BLM has failed to sufficiently demonstrate in the document that compensatory mitigation is justified as a solution for the natural resource conflicts described in the DEIS; however, compensatory mitigation could be utilized to assist county agencies and local communities with infrastructure and socioeconomic issues.

Every place in the document where compensatory (off-site) mitigation is mentioned, the BLM should explicitly state that it is entirely voluntary. The BLM does not have the authority to require Operators to perform off-site mitigation.

It is not clear in the DEIS if compensatory mitigation is consistently supported among the Jonah Operators, although that is implied in several places. The BLM should state that some, but not all, Operators have committed to establishing a fund to finance compensatory (off-site) mitigation for impacts that cannot be fully mitigated on site, or should identify the Operators who have made this commitment.

The DEIS states that the Jonah Infill Working Group will “make every effort to develop innovative funding sources” and “will not depend solely on the JIDPA oil and gas Operators for funding”; however it is unreasonable to assume that significant monitoring and mitigation funding can be “raised” by members of working groups. The BLM should make a concrete commitment of resources to fund an independently supervised compensatory mitigation fund, supplemented with funding from the Operators who are causing the need for mitigation in the first place. The BLM should also clearly state that the recommended monitoring will be funded by industry. This should include any special studies that may become necessary during the life of the project.

The BLM should clarify who is ultimately responsible for meeting mitigation requirements if a mitigation fund is utilized (the operator, the BLM, or a third-party operator who actually does the mitigation).

The BLM should have delayed discussion of a Cumulative Impacts Mitigation Fund until the DEIS was completed. The reference to values of \$850 per acre is improper in the DEIS, especially in the introductory chapters, and prior to analysis of the impacts. There is no obvious basis for these values.

The acreage values for mitigation funding are grossly inadequate and are an insult to all Americans. To pretend that pristine habitat for so many amazing animals, especially such a slow-growing, slow-regenerating habitat, has such little value in its undisturbed state is outrageous.

The BLM needs to clarify its reference to a compensatory mitigation fund based on a dollar per acre amount “above a threshold of 11,000 acres.” A dollar per acre of new disturbance approach may be a mechanism to fund a Cumulative Impacts Mitigation Fund, but not with a threshold based upon approved surface disturbance.

The BLM must revise the DEIS in light of EnCana’s revised Voluntary Compensatory Mitigation Proposal. The DEIS contains an inaccurate and incorrect description of EnCana and BP’s proposed off-site or compensatory mitigation proposal.

The BLM should clarify that specific conditions would apply to compensatory mitigation, including:

- Compensatory mitigation would apply only to impacts that cannot be mitigated on-site through the use of reasonable and economically viable techniques. Once it is recognized that mitigation on-site is not possible and will not be effective, and that compensatory mitigation will be implemented, no additional on-site mitigation specific to that resource value would be required.
- Compensatory mitigation would apply only to resource values subject to significant unavoidable adverse impacts. Such resource values must be specifically identified.
- Compensatory mitigation may be brought forward by an operator(s) that does not represent all those in a development area; therefore, when the compensatory mitigation passes from voluntary to a requirement in a project authorization, the requirement for compensatory mitigation should only impact the operator(s) that included the commitment for off-site mitigation in their plan of development.

The BLM should confirm that compensatory mitigation by replacing or providing substitute resources or environments would also apply to livestock grazing in the JIDP.

The BLM should invite the permittees in the allotments affected by the JIDP to serve on any independent advisory board that deals with the issue of compensation and or mitigation of impacts to current multiple uses.

In addition to the off-site mitigation ideas listed in the DEIS, BLM should select a large area (preferably unleased for minerals) and identify both grazing strategies and habitat improvement strategies that would combine to improve habitat function within that area of BLM lands. There is currently an identified unleased area that could serve that purpose. Improvements could be performed that would benefit both wildlife and livestock, and the area could feasibly be classified in the RMP revision as a Special Management Area for the life of the project.

The Wyoming Department of Agriculture supports compensatory mitigation discussions between gas operators and livestock permittees. Such mitigation strategies and costs could include, but are not limited to 1) Moving livestock to an open allotment or pasture; 2) Purchasing hay in lieu of allotment use; 3. Monitoring development impacts; 4) Developing water; 5) Purchasing grazing land for Cattlemen's Association control; and 6) Reimbursing the producer for AUM loss.

Mitigation projects performed off-site of the JIDPA will also have a direct impact on livestock grazing. Areas surrounding the JIDPA have already been identified for future off-site mitigation, and these areas

have active grazing permits. It is important that compensation be similarly awarded to these permittees, as any off-site mitigation will undoubtedly result in an AUM decrease.

Compliance with Laws (other than NEPA), Agency Policy, and Management Plans

In all but one alternative, the BLM failed to prevent undue and unnecessary degradation in the DEIS per the Federal Land Policy and Management Act (FLPMA). The surface disturbance due to the proposed 5-acre or 10-acre well spacing is much greater than “would normally be expected” from the standard amount of surface impact for natural gas production in Wyoming, and therefore constitutes unnecessary and undue degradation under FLPMA.

The BLM must fulfill its role as trustee of the environment as required by FLPMA. Given that oil and gas leasing, exploration, and development is already occurring on these federal lands, the BLM’s role under FLPMA then becomes that of trustee of the environment. It is not the job of BLM to provide for the maximum recovery of these resources, nor is it the job of BLM to ensure the maximum profit to private commercial interests extracting the resources. It is the job of BLM to protect the environment.

BLM must require and maximize the use of directional drilling in the JIDPA so as to meet its duty under FLPMA, which is to take “any” action necessary to prevent unnecessary or undue degradation of the public lands. Operators in the JIDPA will reap very large profits from their operations even if directional drilling is used.

The BLM failed to universally apply its 2004 Best Management Practices policy. The only alternative that incorporates any BMPs is the Preferred Alternative. Allowing oil and gas drilling without BMPs, should one of the other six alternatives be adopted in the Record of Decision, would create undue and unnecessary degradation to the public lands involved.

The BLM must amend the Pinedale Resource Management Plan (RMP). The surface disturbance of both the Proposed Action and the Preferred Alternative appears to exceed the 6,300-acre limit for reasonable foreseeable development (RFD) surface disturbance stipulated in the RMP Pinedale Anticline amendment. In addition, the DEIS showed significant and unavoidable impacts to air quality values such as visibility and sensitive watersheds; therefore, existing RMP objectives would not be met.

The BLM is charged with managing federal lands for multiple use, and development of the Jonah Field under the Proposed Action is a proper application of multiple-use management. That doctrine does not mean multiple uses within every township or range, or within even small land units; it means multiple use of public lands as a whole.

The Proposed Action and the Preferred Alternative fail to meet the RMP objectives listed in Section 4.2.2 of the RMP or to preserve multiple use of resources on the public lands. Oil and gas development cannot be the sole use of our public lands at the expense of other resources and other uses.

Conditions of Approval

The requirement that all existing well pads and roads be retrofitted to meet zero runoff requirements is not possible to meet. There is no area in Sublette County other than the granite peaks of the Wind Rivers that are even close to zero runoff even without any added surface disturbance. It is virtually impossible to meet zero runoff standards on flat, undisturbed, ground. There are some options to minimize excess runoff that are viable, but the zero runoff goal is not attainable if water moves through a site.

These acreage limitations for individual well pads (7.0 acres for parent and multi-well pads, 4.0 acres for single-well well pads, and 2.0 acres for satellite well pads) are too small when considering all the activities that are being combined. Of particular concern is the inclusion of topsoil and spoil piles as part of the disturbance figures. These items should not be included because they are typically stored on the perimeter of the cleared pad and do not require vegetation removal. It is also not possible to meet these disturbance figures when including pipelines because of the varying length that may be needed.

The final proposed COA would require the Operators to utilize flareless completions for all wells in the JIDPA. As the BLM is aware, the Wyoming DEQ (WDEQ), not the BLM, has jurisdiction over flaring procedures and air emissions in Wyoming. In fact, WDEQ has recently issued regulations regarding flaring in the Pinedale Anticline and Jonah Project areas. As such, it is neither appropriate nor necessary for the BLM to impose this requirement.

The COA requiring new compressor sites to be located away from noise sensitive areas is not well defined. The BLM has failed to map or identify noise sensitive areas. This requirement must be clarified in the FEIS.

Cultural Resources

The text fails to identify whose responsibility it would be to “Develop and implement a research design, discovery plan, and/or cultural resource management plan for the combined areas of the Pinedale Anticline Project Area and JIDPA, and consult with SHPO pursuant to the effect of these plans on affected cultural resources.” This is clearly a BLM-initiated action in consultation with the SHPO if it is pursued. As such, the measure should be reworded to state the agencies’ responsibility, not the Operators’, for accomplishing this task.

Economics

Currently, the BLM’s Jonah (gas field) Infill report concludes that additional socioeconomic impacts will not occur. The data do not support this conclusion.

The BLM should consider scaling back the pace of this development and asking industry to help mitigate the socioeconomic impacts to our lovely community. By slowing down the pace of drilling, the BLM can help create a sustainable economy for western Wyoming instead of creating another 10-year boom/bust cycle that will leave the area scarred, and a number of people without jobs.

The DEIS states that, “BLM defines a significant change as any change that would result in a 15% or greater change of any affected factor.” Why is the 15% figure used here while a 10% change of selected socioeconomic indicators is considered significant by the Pinedale Anticline Project Area FEIS? Also, is there any timeframe associated with this percent change threshold?

Editorial

Given that the BLM is under obligation to provide the public with informative explanations of actions contemplated which will impact the region’s environment, this document falls far short in fulfilling that obligation as an information vehicle. The impacts are indeed addressed but they are spread throughout the document in an almost coded form. It would have been far better to summarize them point-by-point in a broader summary chapter that opens the document for the reader.

The maps and figures shown in Chapter 3 provide no references as to the source of the information. BLM should provide a reference citation for all maps and figures derived from other published information or from personal communications.

Hazardous Materials

The first proposed mitigation measure on page 5-6 would require the Operators to provide the BLM with copies of all Storm Water Pollution Prevention Plans (SWPPPs); Spill Prevention, Control and Countermeasure plans (SPCCs); and other spill and emergency response plans. The only plans Operators submit to BLM are SWPPPs when requested. BLM does not have the authority to either approve or deny these plans.

Health/Safety

Requirements to set well pad size limitations to 7.0, 4.0, and 2.0 acres are dangerous and create permitting conflicts. Future downhole treatments or drilling operations, as well as future safety regulations, could require additional space.

Land Ownership

BLM has no need to know the details of surface use agreements between industry and landowners. BLM has no authority to discuss acquisition of rights on private land. The amount of private land is negligible and not even an issue in the Jonah Field.

Land Use

FLPMA requires that public lands be managed on the basis of “multiple use and sustained yield.” The current uses for the JIDPA include recreation, hunting, birding, and livestock grazing. Essentially the BLM has foreclosed the concept of multiple use in the Jonah Field area, including the JIDPA. For the estimated 100 years the development and production will last, plus an additional estimated 90–100 years for reclamation to occur to replicate the present conditions, the public lands will be withdrawn from use. There will be no multiple use of these lands because there will be nothing left to use.

Livestock/Grazing

The BLM has largely ignored the effects of oil and gas development on livestock grazing in the Jonah and the Anticline Fields. That is why the Record of Decision (ROD) on this project is so important to grazing interests.

The BLM should recognize cooperation between the permittees and EnCana in a positive light and support these efforts. EnCana has shown a willingness to work with permittees to protect grazing capability, and the permittees believe they can work with the Operators’ systematic approach to the drilling phase to manage the distribution of cattle within the allotments. If the permittees work with the Operators to assist the reclamation success, all of the rangeland resources can benefit in the long term.

The BLM should require all the oil and gas operators involved in the project to mitigate the loss of the vegetative resource and the impacts to livestock permittees who are grazing in the Jonah. Currently, only one operator (EnCana) is interested in the impact the project is having on the range resource and livestock permittees.

The BLM should immediately enter into consultations with the permittees in the affected allotments, and the FEIS should reflect the results of those consultations. The BLM should include a narrative describing the intent of the BLM to enter into a Joint/Cooperative Monitoring program with the permittees to evaluate impacts and trends on rangeland resources and economic impacts to ranches that hold the grazing permits in affected allotments.

If there needs to be an adjustment in AUMs, then that should occur as Temporary Non-Use, and not as Suspended Non-Use. How the grazing program will be handled during the infill process should be clearly established in the ROD.

All affected grazing permit holders should receive compensation if grazing is suspended. Affected allotment permittees should be allowed to use other allotments that are being underutilized.

Following all projects and project impacts in the JIDPA, the Wyoming Department of Agriculture (WDA) insists that once reclamation projects are successful and complete, the BLM will restore all active grazing to the permittees. The Stud Horse and Sand Draw Allotments should be monitored for the eventual reinstatement of suspended AUMs in the allotments.

The BLM failed to describe the analysis used to conclude there will be a total loss of 1,410 AUMs under the Preferred Alternative (Table 4.19 on 4-133).

The BLM should recalculate lost AUMs in its analysis of grazing impacts to exclude the Blue Rim Desert Allotment. Since the total AUMs in this allotment are not included within the JIDPA, they should not be counted toward determining surface disturbance impact. With this adjustment, the short-term loss impact is then increased from 17.9% to 25%, and the total AUMs present in the three allotments rises from 26% to 37%.

All AUMs in each allotment should be analyzed for discussion of utilization. The AUMs considered available for utilization in the two most impacted allotments are 4,465 AUMs for the Sand Draw Allotment and 2,303 AUMs for the Stud Horse Allotment, versus the reported 2,324 AUMs and 1,730 AUMs respectively. These figures include all suspended AUMs, which should be included in the discussions.

The DEIS incorrectly makes the blanket assumption that the Proposed Action or similar levels of development would require large-scale reductions in AUMs. It appears that an unscientific approach was used to arrive at a predicted loss of 1,410 AUMs. When the surface disturbance for each allotment is analyzed on a section-by-section basis for each well spacing, then converted into AUMs and added together, the total is 662 AUMs affected under the Preferred Alternative. This differs greatly from the 1,410 AUMs stated in the DEIS. The BLM should consider recalculating the acres of surface disturbance on a section-by-section basis for each allotment. With only 662 AUMs affected, there is no need for a reduction in AUMs. Also, when the utilization is in the moderate to low level there is no need for reduced grazing.

The BLM inadequately addressed the potential impacts of the JIDP on the ranching industry and the broader community. The BLM desert allotments are essential to ranching operations in this valley because they are designed for spring grazing of livestock, and there is very little rangeland available for spring grazing in Sublette County. These particular allotments have no substitute. To lose the ability to use the spring grazing permit will have a ripple effect on the rest of the ranching operations. There is not a fair cash compensation program to mitigate that. As ranches lose the ability to graze and are forced to change their operation or sell out and subdivide, the potential for losing open spaces is huge. This multiplier effect also will increase land prices across Sublette County.

The BLM incorrectly assumes that there is no excess forage available for grazing with the proposed increase in surface disturbance due to the drilling activity; however, a voluntary and informal monitoring program conducted in the summer of 2004 indicated there is more forage available than is currently being grazed.

In the Glossary, the BLM should clearly state in the definition of “No-Surface Occupancy” that range improvements are not included.

Mineral Resources/Natural Gas Recovery

Claiming that 750 billion to 1 trillion cubic feet of natural gas will be “wasted” if the Operators are not allowed to develop at the pace and scale they desire is a lot like saying that a bucket of water is useless until it's dumped out.

The BLM should leave a strategic reserve of natural gas in the Jonah Field accessible by valving existing infrastructure.

Restricting development decreases ultimate recovery; on the level of an entire gas field, the gas left behind will become unrecoverable.

The BLM should allow total development of the Jonah Field now, while it has the power to set the parameters for environmentally responsible development. Within the next 10 years, demand for domestic energy will likely outweigh any concerns for environmental protections. The land will be immune from future uncontrolled exploitation of that last small percentage left only if the gas is completely depleted now.

Because the Jonah Field contains 25 times more gas per acre than other fields in southwestern Wyoming, to obtain the volume of gas that the Preferred Alternative would leave behind would require five times more surface disturbance in another field. Leaving this volume of natural gas behind is, therefore, environmentally irresponsible.

NEPA

The BLM failed to comply with NEPA by not considering impacts on climate. NEPA specifically requires agencies to “. . . recognize the worldwide and long-range character of environmental problems,” and natural gas exploration, development, and production all disgorge vast quantities of pollutants into the air, potentially contributing to global climatic problems.

The BLM should expedite the NEPA process to provide much-needed energy to the nation as soon as possible.

The BLM failed to comply with NEPA by not disclosing all of the environmental impacts resulting from the proposed action and not providing sufficient mitigation for those impacts that are disclosed. The BLM identified multiple potential impacts that could result from the intense level of surface disturbance proposed, but the EPA points out that there is also potential for wetlands impacts from surface activities located in playas.

The BLM failed to comply with NEPA by not basing its analysis of the environmental impacts of the JIDP on the most up-to-date information in the most consistent and clear way to facilitate public comment. Instead, the BLM published an analysis based on already outdated information in a document that is confusing and contradicts itself.

The BLM failed to evaluate all alternatives in detail by not modeling air quality impacts for four alternatives, including the BLM's own Preferred Alternative. The BLM must provide for public comment on results of the air quality modeling for the Preferred Alternative before the FEIS is completed.

By not modeling runoff condition before issuing the DEIS, the BLM failed to provide for full public scrutiny as required by NEPA and failed to perform the best scientific analysis as required by NEPA. It seems unlikely that the required modeling can be done during that period due to limited time; therefore, the final EIS may be issued without the necessary and mandatory scientific analysis required by NEPA, and the BLM cannot make the best decision regarding the proposed action without the best scientific analysis to support it.

The Executive Summary notes that modeling to quantify soil impacts will also be run during the DEIS and results will be reported in the FEIS. Impacts to resources are supposed to be analyzed and presented to the public in the DEIS—not afterwards. It appears that the BLM is attempting to end-run the public process and simply publish an insufficient Draft document that does not provide the public the intended information, and they assume that will be acceptable as long as the impacts are ultimately revealed in the FEIS. The BLM seems to misunderstand the intent of NEPA, which is to not only show the impacts but to work with the public to attempt to generate means to minimize those impacts.

The BLM violated NEPA by not modeling soil impacts and not providing a quantitative analysis of soil impacts in the DEIS for public review. This is a particularly serious issue given the highly sensitive soils in the area and poor revegetation capabilities in the JIDPA.

NEPA requires analysis of impacts *before* substantial decisions are made that set development in motion. The BLM will fail to comply with this requirement by approving the drilling of some 3,100 wells, together with the construction of miles of roads and pipelines, plus ancillary facilities, without knowing where the wells and roads will be located, specifically, and what relationship they will have spatially with ecologically important habitats (well placement will be left to the discretion of the Operators). It is impossible for BLM to provide a meaningful analysis of impact severity without this knowledge.

Noise

The DEIS states that residents are concerned over project noise and how it affects their quality of life. The DEIS contains no information on which this conclusion is based. If there is no quantitative data to support this statement, it should be removed from the FEIS.

The statement that noise has already contributed to the apparent decrease in wildlife on and adjacent to the JIDPA cannot be justified. In order to make the conclusion that wildlife is being impacted from noise, incremental noise levels from the JIDPA should have been monitored over time compared to the data on wildlife populations. This has not been done.

The DEIS concludes there will be significant impacts from noise and odor within the JIDPA and vicinity under all alternatives. We completely disagree with this conclusion. To make this conclusion fails to recognize the effectiveness of mitigation that will be used to reduce noise. The DEIS does not include quantitative details about the attenuation of noise from mufflers, barriers, and other techniques that will reduce noise at the source. Without this information, concluding that significant impacts will occur is without merit.

On-Site Mitigation

The BLM should make it clear that the increased mitigation requirements proposed under the JIDP only apply to wells that are truly infill between existing wells and not to extension wells beyond the perimeter of existing wells.

The ability of the BLM to impose mitigation measures on the Operators is unclear. On the one hand, the BLM states that it cannot require Operators to do anything in the way of adopting actions or methods to minimize environmental consequences, yet in Section 2.0 “requires” and “imposes” Conditions of Approval and several other mitigation measures.

The BLM should include a discussion of the Energy Policy and Conservation Act (EPCA), with particular emphasis on the fact that (1) mitigation requirements must be either statutorily required or scientifically justifiable and (2) they must be the least restrictive means to achieve the desired level of resource protection. References to these EPCA requirements should be added everywhere mitigation measures are listed.

Because of the BLM’s poor track record in enforcing mitigation measures from past NEPA processes, the BLM must include a review of past mitigation measures and their effectiveness and implementation.

A comprehensive monitoring plan will be necessary to adequately describe the impacts and effectiveness of mitigation for this large, intense, long-term development. Adaptive management reaction to monitoring information will need to be assured.

The unusual intensity of the well spacing for the Proposed Action indicates that the mitigation being proposed may not be adequate. Considering all of the significant impacts identified in the DEIS to wildlife and surface water, the DEIS is lacking in providing specific approaches for maintaining ecosystem viability.

Prior to implementing the proposed action, BLM should provide more monitoring and analysis on the habitat surrounding the Jonah field and consider establishing habitat protection areas and buffers that would provide suitable habitat.

The BLM and other stakeholders must become more aggressive in coordination and funding of monitoring activities. The BLM must be vigilant in its management of development such that it always knows the condition of the various resources within its management authority and the impacts of development on those resources.

Based on the sediment/salt load modeling results that will be addressed in the FEIS, the BLM should consider additional mitigation in the FEIS to further reduce runoff, if necessary.

Once initial drilling has occurred, efforts should be made to reclaim as much as the area immediately, while continuing to allow access to the wellhead for maintenance. To ensure the completion of reclamation, the Wyoming Department of Agriculture suggests bonding be increased to cover reclamation costs. This increase in bonding will ensure that reclamation be completed regardless of the gas operator.

The BLM failed to provide useable information regarding the efficacy of the mitigation measures it relies upon. Although NEPA and its implementing regulations do not require quantitative certainty in all cases, the BLM is rushing ahead to authorize unique densities of development without understanding the extent to which its standard mitigation measures can alleviate impacts even from lesser levels of development.

The BLM is inviting potential challenges to the ROD for the JIDP by admitting that the efficacy of several proposed mitigation measures is “unknown.”

The BLM should not require the extraordinary mitigation measures listed in the DEIS because existing BLM lease stipulations and surface use procedures are adequate and proven to prevent and mitigate impacts. There is a long history of successful rehabilitation of public land in Wyoming based on standard practice of the oil and gas industry, existing lease stipulations, guidelines, and On-Shore Orders. The implication in the DEIS that the significance of impacts from the JIDP is far greater than the significance of impacts from prior developments is not justified.

The BLM could supplement the Proposed Action by considering any and all surface disturbance mitigation requirements as “additional potential mitigation measures.” This would provide a better solution than rejecting the Proposed Action and adopting the Preferred Alternative because the Jonah Infill Working Group would make site-specific surface disturbance mitigation recommendations to the BLM based on actual field observations rather than the BLM mandating arbitrary Surface Disturbance Limitation Areas (SDLAs) up front under the Preferred Alternative.

The BLM should recognize that reclamation yields high-quality forage for domestic and wild animals as well as forbs for sage-grouse. If the BLM were to adopt the Proposed Action, this high-quality forage would replace the existing sage brush and other native plant species, thereby offsetting the surface disturbance and eliminating the need for surface disturbance mitigation requirements altogether.

Operator-Committed Practices

The BLM has included several modifications and amendments to the set of Operator-Committed Practices without informing or consulting with the Operators. EnCana has reviewed and modified the set of Operator-Committed Practices in Appendix B of the DEIS and submits those changes, as well as comments supporting such changes. Because Operator-Committed Practices are voluntary, the BLM must accept these changes and incorporate such changes into the FEIS.

Paleontology

The JIDP DEIS states that: “For the purpose of this analysis, it is assumed that increases in surface disturbance correspond to an increase in the potential for impacts to paleontological resources.” This assumption is not entirely accurate as the impacts to paleontological resources are also a function of the presence of such resources. Clearly, if paleontological resources are not present, they will not be impacted by surface disturbance.

The JIDP DEIS states: “The recent discovery of Pleistocene horse bones (tentative identification) during well pad construction in the JIDPA affects potential future paleontological mitigation procedures for the area since Pleistocene paleontologic materials were previously unknown for the JIDPA. Significant fossils likely occur in the JIDPA.” The document’s assertion that “significant” fossils are likely to be encountered in the JIDPA ignores the fact that only a single, yet unidentified, fossil has been encountered in the JIDPA despite the extent of surface disturbance that has occurred to date. The suggestion that significant fossils will be encountered is not supported by the discovery of a single unidentified Pleistocene-aged fossil.

Performance Objectives

Outcome-based performance objectives should be established that allow flexibility for the Operator(s) to ensure responsible development of the resource and that hold the Operator(s) responsible to achieve the stated objectives.

Air quality performance objectives should only be based on monitoring data and not predicted modeling impacts. These objectives should also be rewritten to acknowledge the Wyoming Department of Environmental Quality's (WDEQ's) jurisdiction.

The performance objective regarding the centralization of facilities, as currently written, is unreasonably restrictive and impractical. Requiring centralized facilities may actually require greater surface disturbance in portions of the JIDPA because of topography and other constraints. Further, the requirement is unreasonably vague because it does not clearly state that it applies only to new facilities, not existing facilities. The BLM does not have the authority to require modifications to existing facilities at this time.

The DEIS does not demonstrate that soil erosion or salt loading is currently or will be a significant problem in the JIDPA. Until the BLM completes the ongoing soil modeling and analysis, it is premature for the BLM to create an outcome-based performance objective related to soils and soil erosion. WDEQ's jurisdiction over surface water and groundwater quality issues must also be acknowledged. Although it may be appropriate for the BLM to identify reasonable mitigation measures even if they are beyond the BLM's authority, the BLM should not attempt to regulate matters that are beyond its jurisdiction.

One of BLM's stated performance objectives for its Preferred Alternative is to "maintain or improve currently active big game migration routes." While maintaining is understandable, it is unclear what is anticipated for "improving" the routes. We are unaware of any biological criteria in existence for "improving" migration routes.

As currently drafted, the Preferred Alternative's proposed performance objective relating to reducing the degree and extent of human activity within the JIDPA "below current levels" is vague and impractical. First, the BLM has not clearly defined the term "human activity" or provided reasonable expectations for reducing human activities. Second, it can be difficult to decrease human activities during drilling operations without compromising safety.

Another proposed performance objective would require the Operators to prevent the contamination of all surface and groundwater. This performance objective is vague and unreasonably restrictive. First, the requirement does not specifically reference potable drinking or potable groundwater supplies or formations and is therefore unacceptable. As currently drafted, this performance objective could be construed to limit the Operators' use of water supplies because the Operators use water for drilling operations. Second, the BLM has failed to adequately define contamination.

The final performance objective would encourage the Operators to participate and support peer-reviewed research regarding the impacts of oil and gas development. This is not an outcome-based performance objective, but rather an attempt to require the Operators to fund additional studies. It is inappropriate for the BLM to mandate participation in off-site wildlife studies of any kind. This requirement must be removed entirely from the BLM's list of performance objectives.

Public Participation

Once the air quality modeling is finished for the Preferred Alternative, the BLM must release the modeling results to the public and provide for a sufficient public comment before the project progresses further. The BLM cannot simply include the modeling results for the Preferred Alternative in the final EIS and not provide for public comment.

The BLM should convene a stakeholder work group to provide additional explanation regarding the forthcoming air quality analysis and solicit stakeholder input that could prove valuable toward the supplemental work product.

If the BLM's Preferred Alternative is chosen, a working group made up of citizens, government experts and industry representatives will be established to make recommendations for the Jonah Infill project. Before the BLM approves a working group for the Jonah Infill project, however, it must evaluate the effectiveness of the Pinedale Anticline Working Group (PAWG). First, funding has been a persistent issue with the PAWG as it is unclear who is paying for the mitigation measures the PAWG recommends. It is unreasonable to assume that significant monitoring and mitigation funding can be "raised" by members of working groups. The BLM should have mitigation and monitoring funding available and be supplemented with funding from the Operators who are causing the need for mitigation in the first place.

If an interagency adaptive management group (Jonah Infill Working Group) is created to assist with the BLM's implementation of the Preferred Alternative, the Operators should not be required to fund its operations.

The Jonah Field should not be included in the PAWG's responsibilities, in part, because Jonah Field and the Pinedale Anticline field have different resources that require different mitigations and different drilling and exploration techniques. Also, Jonah Field is in an infill development phase while Pinedale is still in an exploratory phase. Trying to achieve common plans, programs, monitoring and mitigations is not possible.

The idea of creating an entire new set of working groups and task groups for each field is impractical and ineffective. Such small groups are guaranteed to fail, as their purview is not comprehensive enough to address the issues at hand. We strongly suggest a Southwestern Wyoming Regional group comprised of all of the players.

The BLM must provide further details regarding the Jonah Infill Working Group in the FEIS, including a clarification of the responsibilities of the group.

Before the PAWG charter is amended to include the Jonah Field, the BLM must determine whether the PAWG will be able to handle the additional workload.

The BLM should not consider having the PAWG charter amended to include the Jonah Field and the JIDP. The PAWG is not functioning effectively now, and adding additional operators, additional lands, and additional potential issues would worsen existing problems.

The Jonah Infill Working Group should remain exempt from the Federal Advisory Committee Act ("FACA"). The increased administrative burdens and costs of administering and utilizing a FACA chartered committee are not justified by any benefits associated with a FACA chartered advisory committee.

While the industry and government agency members of the working groups are being paid to attend the meetings, the citizen members are not. In order to avoid an unbalanced advisory committee, the BLM must ensure that adequate representation on the task groups and working group can be achieved.

Recreation

The assumptions and dollar values given for both hunting and other forms of recreation are unacceptably low and do not truly reflect the actual value of citizen's free time and quality of life as related to recreation activity. I personally can attest that I and everyone that I know find the value of our recreational activity to be at least ten times higher, if not more, than the values listed in Table 3.53 of the DEIS.

The DEIS concludes that unavoidable adverse impact to recreation will occur due to the likely avoidance of the JIDPA by recreational users. This conclusion is very subjective without a reference to a survey or research regarding these impacts. Concluding that impacts to recreation are adverse also appears excessive when based upon such a subjective set of considerations.

Site-Specific Conditions of Approval

The JIDP DEIS is not clear how or why the requirements listed in Section 2.14.3 are different from the proposed requirements and Conditions of Approval discussed in Section 2.14.2. The BLM should either clarify how these requirements are different, or simply include them in the list of potential mitigation measures that may be utilized by the Operators.

Social

To be an accurate and reputable document, the DEIS should use the very latest socioeconomic and demographic data available. This is particularly so owing to the magnitude of recent socioeconomic changes in the analysis area. Table 3.24 of the DEIS, for example, presents 2000 data as the most recent, however 2004 income and employment data are available through various State departments and should be used. Similarly, Table 3.25 ends at 2000 Census figures, but 2004 Wyoming Department of Employment figures are available and should be used. Cost of living data presented in Table 3.28 ends two years ago, but updated figures are published every few months. This pattern continues throughout the socioeconomic portions of the document...Updated statistics should be found and incorporated throughout.

This entire socioeconomic impact analysis section is absurd. No "undue burden on existing infrastructure"? Does the writer of this DEIS happen to live in Sublette County? Do they read the newspapers? Thirty-two percent of the housing is second homes and therefore to say that these are vacant and therefore available is absurd and misleading. "No housing shortages are anticipated." If there currently is no shortage, why are the motels filled with residents?

The EIS states "This project is not likely to create additional, new significant impacts." It is hard to find a genuine thread of truth in that statement given the BLM proposes to increase drilling rigs by 4 times up to 250 wells drilled per year. Do they not predict that 4 times the number of workers would be required to accomplish this goal, and with that worker population increase, an increase in traffic, crime, drug use and abuse and housing shortages that are occurring with the current workforce? To ignore even the possibility of an increase in these socioeconomic impacts—and the presentation of potential impacts—and instead state that the public will be better off because of the increased mineral royalties paid to the state is not only laughable but inconsiderate of the public.

Soils

At any pace of development, the topsoil being removed from one drill pad can immediately be relocated to the reclamation site of a prior pad. This “leapfrogging” of topsoil will allow the soil to remain productive, viable and present, as less will be removed through pile erosion. Every effort should be made to minimize topsoil being removed from a future drill pad site only to be piled and stored for future use. Leapfrogging of topsoil imitates immediate reclamation and minimizes the surface impacts of drilling. Interim and immediate reclamation protects the natural resource base, predominately forage for wildlife and livestock. Invasive and noxious weed infestations will not be allowed to establish and develop a stronghold.

The BLM must quantify impacts to soils before it concludes [in the DEIS] that loss during runoff events and loss of productivity are significant impacts to soil.

The discussion of erosion in Chapter 4 does not illustrate prevention of accelerated erosion (i.e., rilling and headcutting). Accelerated erosion is generally the term to describe impact of a development that may result in erosion events that are in addition to the natural, or preexisting, erosion process. Disturbance that may create accelerated erosion should not be allowed if cannot be prevented. The discussion references increased erosion but it is not clear how that equates to prevention of accelerated erosion. The topic of accelerated erosion needs to be addressed.

Surface Disturbance/Directional Drilling

The BLM should not use directional drilling as a panacea, mandating it in a flawed attempt to mitigate potential surface effects to JIDPA, while causing other impacts.

- BLM assumes that directional drilling can be widely used in the Jonah Field despite the technical studies and empirical evidence demonstrating the limitations of directional drilling in this particular field.
- Directional drilling in the Jonah Field leads to inadequate resource recovery due to an inability to set casing at the bottom of the hole.
- Directional drilling leads to additional air emissions and truck traffic.

The BLM fails to recognize that directional drilling is not economically feasible in every situation. The Operators’ experience in the Jonah Field, after drilling more than 150 directional wells, demonstrates that drilling and completion costs for directionally drilled wells are approximately 15% to 30% greater than a conventional vertical well.

A tax break for directional multi-well pads should be considered.

Directional drilling decreases the value of well logs due to poor hole conditions not seen in vertical wells.

BLM should utilize directional drilling to the maximum extent possible, so as to reduce surface disturbance, habitat fragmentation, and habitat destruction from well pads, road density, and other infrastructure.

By not sufficiently using directional drilling in the Preferred Alternative, the BLM fails to meet its outcome-based performance objective to “Utilize state-of-the-art technologies to avoid, minimize, or mitigate impacts.”

Directional drilling has proven technically and economically feasible in a broad range of geologic settings, and has proven to substantially increase producible reserves of oil and gas. Because the increased productivity of directional drilling compensates for additional costs, directional drilling is often more profitable than vertical drilling.

The fact that the industry has already drilled and completed 54 (or more) directional wells in the Jonah Field argues that operators believe this type of technology is economically feasible.

Technical Information

The existing method of utilizing reserve pits for fluids and drill cuttings is working well; there is no reason to mandate closed drilling systems. [The BLM would, on a case-by-case basis, allow reserve pits if it is proven that a closed drilling system in a particular site would be technologically or economically infeasible]. In addition, the requirement to vacuum and remove fluids within 60 days from reserve pits is unreasonable—pits are frozen at least four months of the year. Finally, it should be noted that transport and disposal of the fluids increases environmental liability.

BLM's Preferred Alternative states that hard-line fracturing processes would be required for all well pads when surface density = 1 well pad/40 acres, and recommended when well pad surface density is < 1 pad/40 acres. This is not practical at a well spacing of 40 acres. Forty-acre locations would probably not be drilled concurrently, making centralized fracing impossible. It would result in additional disturbance—it is not feasible to follow roads and pipelines on 40-acre well spacings. This should be an operator-committed practice where practical, feasible, and economic. We think that the “hub and spoke” concept will work on the 10-acre satellite concept.

The DEIS states: “Operators would begin piping produced water and condensate from all wells in the JIDPA to appropriate treatment or disposal facilities beginning no later than January 1, 2008; this would supersede previous decisions related to method of condensate disposal.” This requirement must include an economic consideration. There are some cases that the amount of water and condensate is so small that the justification for including it into a gathering system cannot be justified. At the same time, those locations would have low traffic volume from haul trucks due to the low volumes of water and condensate produced. In addition, this requirement should only apply to new facilities yet to be built and consideration must be given to extend the 1/1/08 deadline.

Topography

The DEIS states that “significant cumulative impacts to topography are anticipated under the Proposed Action and Alternatives A, C, D, F and G.” This conclusion is questionable, considering the mitigation measures being proposed in Section 2.14 and in Appendices A, B, and G that would directly apply to topography.

The DEIS states that “Natural gas development in the JIDPA now dominates the landscape, with over 500 wells and associated roads and pipelines.” This sentence improperly confuses personal visual impacts with topographical impacts. The JIDPA covers approximately 30,500 acres, of which only 4,200 acres can be disturbed at any one time under existing authorizations. This is approximately less than 14% disturbance in the JIDPA. Further, EnCana's own analysis demonstrates that less than 3,500 acres have been disturbed to date in the JIDPA, much of which has already been successfully reclaimed. The BLM should delete this sentence and refrain from making potentially misleading and non-objective statements in the FEIS.

The DEIS's description of potential impacts to topography resulting from the Preferred Alternative is inaccurate. The BLM has not provided supporting data to indicate that the impacts of the Preferred Alternative will be similar to that of the No Action Alternative. The FEIS should disclose the potential impacts stemming from the Preferred Alternative in a manner consistent with its description of every other alternative.

The JIDP DEIS suggests prohibiting disturbances at rock outcroppings in the JIDPA. The BLM should map and identify topography to be avoided by Operators. Once mapped, the Operators will be able to respond to this proposal in more detail.

Transportation

The DEIS states: "Operators would inventory all roads/trails in the JIDPA not already inventoried by BLM within one year of the date of the ROD for this project; GIS data would be provided to BLM, WGFD, and the Jonah Infill Working Group (JIWG) with FGDC-compliant metadata." Why is this being requested of the companies? BLM should have these data readily available in their road/right-of-way database or with individual APDs. If not, these data sources should be used by the agency to accomplish the task.

A conclusion is made in the DEIS that "unavoidable adverse impacts to transportation would occur for the LOP primarily as a result of increased traffic and the expanded road network." There are no statements that support this conclusion. With all the mitigation being proposed and the transportation plan drafted, this conclusion is not supportable.

The increased traffic in the JIDPA could be mitigated if there is an attempt to include professional evaluation of the road networks required. It is inconceivable that only 8 new miles of collector roads are envisioned to support 353 new wells. This implies less than adequate input in the transportation planning of the network of roads. The BLM and operators must continue to work closely with WYDOT to anticipate situations that create safety issues for Highway 191N. It is doubtful that the improvement of the Luman and Burma roads will increase the recreational opportunities in Jonah. Eventually, Sublette County may have to react to industry and declare the Luman and Burma Roads as county roads. BLM and the Operator(s) should conduct a professional engineering evaluation of the traffic density and patterns. If additional collector roads are needed, they should be designated and designed to handle the traffic and loads.

The DEIS states: "Operators could jointly develop and submit for BLM approval road maintenance and use agreements designating road development, maintenance, and use requirements by each Operator." Road maintenance agreements are usually binding contracts between companies. The BLM generally does not enter into maintenance agreements with companies and has no authority to dictate the terms and conditions of these agreements because the agency is not a party to these contracts. The preferred approach is for companies to work together and adjudicate maintenance agreements amongst themselves.

Vegetation

The potential for impacts to pronghorn associated with probable changes to the spring/summer/fall habitat is not accurate because changes in vegetation are likely to be beneficial to pronghorn, not harmful. Both the natural succession that follows disturbance and the revegetation of disturbed areas is likely to improve spring/summer/fall pronghorn habitat by increasing the diversity of herbaceous plants. Mature shrubs in this habitat are not of great value to pronghorn, but the young regenerating shrubs will add to the forage diversity and increase the value of this habitat. Pronghorn are not sagebrush obligates during the spring, summer, and fall when they eat a wide variety of herbaceous forage plants and relatively little sagebrush.

The DEIS implies that disturbed sagebrush may take up to 90 years to be established. This is a grossly inaccurate. Near the Jonah Field are numerous old sagebrush spray projects completed by BLM in the 1960s. Many thousands of acres were treated with 2-4D and equivalent chemicals. Large stands of sagebrush were eradicated. In the late 1970s, less than 20 years after treatment, dense stands of sagebrush reestablished in the treatment areas. Numerous disturbed sites and pipelines exhibit good regeneration of sagebrush, in Sublette County and throughout Wyoming.

The modeling results regarding habitat fragmentation that are presented illustrate the potential reductions in largely sagebrush habitats on the JIDPA and the text in Chapter 4 describes the projected loss in sagebrush obligate species. What is overlooked in this presentation is the fact that there will be beneficial effects to non-sagebrush obligate species associated with each of these scenarios. Prairie dogs, ground squirrels, burrowing owls, grassland birds (including mountain plovers), and most medium to small mammal species will all benefit from the opening up of the sagebrush monoculture. Also, the prey base for raptor species is likely to be increased with the opening up of the sagebrush habitat.

Visual Resources

BLM has identified additional visual mitigation measures in the section on Operator Committed Practices that are designed to further reduce visual impacts. However, the JIDPA area is classified VRM Class IV, which provides for modification of the landscape. The level of visual mitigation stipulated in both Section 2.14 of the DEIS and in the Operator Committed Practices is not commensurate with VRM Class IV. Some of the measures go beyond these criteria, such as piping water and condensate or centralizing development and production facilities, and should be removed from the proposal.

A sentence in the DEIS states that all project alternatives within the JIDPA and its incumbent development coupled with other regional developments are visible and may dominate the viewscape from VRM Class II and III areas, some sections of Highway 191 and nearby wilderness and wilderness study areas within the Cumulative Impact Assessment Area (CIAA); and concludes that significant cumulative impacts to regional visual resources will occur. Considering the distance of the JIDPA off Highway 191 and the fact that most of the facilities are located out of the viewshed from Highway 191, it is difficult to justify this conclusion. Even in cases where smoke or plumes are evident from operations in the JIDPA, these are short term and intermittent and would have no permanent visual impact on VRM Class II or Class III areas nor along Highway 191.

If the BLM cannot justify a position for a Visual Resource Management Specialist, then the operator should not be influenced into furnishing one. If this resource skill is truly needed, it can be provided from within the BLM organization. The BLM has a management process to consider and justify new positions, and a DEIS is not a part of that process.

Water Resources

The DEIS proposes that Operators “File all NPDES permits and associated water quality data with the BLM and consult with WDEQ, WGFD, BLM and livestock permittees before any water release.” The need for this measure does not exist since there are no plans to file for or acquire an NPDES permit for surface discharge of produced water in the JIDPA.

The DEIS implies that all surface waters in and around the JIDPA will be impacted by increased sediment deposition. However, with successful reclamation and the construction of sediment retention/catchment areas where needed, only minor amounts of project-related runoff sediments are anticipated to reach perennial surface waters. Therefore, not all surface waters in and around the JIDPA will be impacted by the increased sediment deposition.

The DEIS includes as a “Feature Common to All Alternatives” the following: “A groundwater monitoring program for all water wells in or affected by activities in the JIDPA would be implemented, with annual reports to BLM, Jonah Infill Working Group (JIWG), Wyoming State Engineer’s Office (WSEO), and WDEQ. Water wells would be tested annually for drawdown, general chemical constituents, and total petroleum hydrocarbons, using WDEQ-approved methods.” This groundwater monitoring program mimics the program in the Pinedale Anticline Project Area (PAPA). In the PAPA, the groundwater monitoring program was designed and implemented to protect perched water tables on the Mesa and domestic wells near Pinedale and along the New Fork River. In contrast, there are no perched water tables or domestic wells in the JIDPA. The shallow wells that do exist are used for irrigation, livestock and wildlife and are fully protected by the gas well casing program required by both the BLM and the Wyoming Oil and Gas Conservation Commission. As a result, no significant impacts to ground water resources are anticipated under any alternative. Therefore, there is no basis for requiring a groundwater monitoring program in the JIDPA.

The BLM should incorporate the WDEQ’s rule regarding water quality decline or downgrading (WDEQ Water Quality Rules and Regulations, Chapter 8, page 6). An overall decline in water quality within the JIDPA would not be a significant impact if the overall water quality within the JIDPA was restored to pre-infill drilling water quality or better after infill drilling was complete.

The BLM does not have the authority to regulate water quality and groundwater will not be impacted by the Jonah Infill Drilling Project. Therefore, there is no basis for requiring groundwater monitoring.

The DEIS does not identify the “functioning condition” of the wetlands resource area within the project area. This information should be included in the FEIS.

Wildlife

The BLM should justify why the north end of the Jonah Field is considered “prime sagebrush habitat” when a large part of Wyoming is sagebrush.

By authorizing extreme levels of disturbance to sagebrush ecosystems, pronghorn migration corridors, and sage-grouse crucial habitats, JIDP will impair native ecosystems without any reliable guarantee of adequate reclamation, eliminate entirely a significant recreation resource for the foreseeable future, and fail entirely to ensure the viability of pronghorn migration corridors and important sage-grouse habitats.

The Wyoming Game and Fish Department (WGFD) has unequivocally stated that once surface disturbance reaches 40-acre well spacing, habitat function is essentially compromised. To attempt to minimize any additional surface disturbance or completely mitigate impacts onsite is a futile attempt to “perfume the pig.”

The Preferred Alternative is inconsistent with state plans and policies regarding wildlife. The BLM should incorporate, to the maximum extent possible, all WGFD recommendations for preventing or, where necessary, alleviating impacts to high-value habitats.

Contrary to requirements under FLPMA, the JIDP, particularly without guaranteed compensatory mitigation, violates the Wyoming Game and Fish Commission’s official policy of “no net habitat loss.”

The JIDP is inconsistent with WGFD’s recent Minimum Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats on BLM Lands. The JIDP will affect two important categories of priority habitat: (1) identified pronghorn migration corridors; and (2) sage-grouse leks, nesting and brood-rearing complexes, and winter habitat. The majority of the alternatives, including

the Preferred Alternative, fall well above the threshold for “extreme impact” (densities of greater than 16 wells, or 80 acres of disturbance, per 640-acre section) for sage-grouse habitat.

The BLM failed to conform to or address WGFD’s additional prescriptions for “high impact” areas in sage-grouse habitats (directional drilling, clustered development, removal of condensate by piping, remote monitoring, development of a travel plan, and gating and closing of all newly constructed roads to public travel).

The BLM failed to conform to WGFD’s additional prescriptions for “extreme impact” areas, which include developing well fields in smaller, incremental phases, and implementing habitat treatments outside the well field (the Preferred Alternative rejects any commitment of resources that would ensure beneficial habitat preservation or treatment outside the affected well field).

The BLM failed to conform to WGFD’s recommendation that for migration corridors of more than half a mile in width, further constriction should be avoided, and well-field density should not exceed four well locations per section. No plan in the DEIS contemplates density of less than 16 wells per section.

The BLM failed to provide essential information regarding baseline environmental conditions for wildlife and wildlife habitat.

The BLM is requiring inventories of greater sage-grouse seasonal habitats and aerial surveys of winter sage-grouse habitat after the JIDP is underway. Under the Council on Environmental Quality’s NEPA regulations, the time for gathering baseline information is before the agency decision is made, not after sage-grouse habitat is developed at levels of 19% to 34% total ground disturbance.

BLM failed to adequately analyze impacts to pronghorn and pronghorn habitat, and failed to disclose that the addition of 3,100 vertical wells in the JIDPA will likely create an area that is [un]inhabitable by pronghorns in the future.

The BLM failed to provide any scientifically credible information as to (a) what proportion of the effectiveness of the local pronghorn herd’s crucial habitat has been lost, and (b) what this loss of crucial habitat means for the behavior of pronghorn or crucial factors relating to population trends.

The BLM lacks adequate scientific data to determine with any certainty the probable effect on migration corridors, and is embarking on an uncontrolled, unmonitored experiment on the existing pronghorn population.

The BLM failed to discuss the Wyoming Game and Fish Department’s refutation of BLM’s accepted myths regarding wildlife “adaptation” to development in migration corridors.

The BLM failed to provide mitigation (either on-site or off-site) for impacts of JIDP on pronghorn migration or on greater sage-grouse and sage-grouse habitat.

The BLM’s approach to the JIDP seems out of step with the promises made in its recent National Plan for Sage Grouse and its perceived commitment to recovery. The thin margin affecting the U.S. Fish and Wildlife Service decision not to list sage-grouse under the Endangered Species Act included, in part, the expectation of execution of the BLM National Plan.

The BLM included no specific future plan for sage-grouse habitat and population restoration in the DEIS. With no specific plans or performance dates, it seems likely that another listing proposal may precede such restoration if this kind of development continues.

The BLM has failed to incorporate appropriate protection measures into its DEIS for the BLM Wyoming Sensitive (BWS) pygmy rabbit and its habitat.

The BLM failed to address protection measures for the BWS white-tailed prairie dog, with the exception of some vague requirements in the BLM Preferred Alternative, and failed to discuss how loss of the Big Piney Complex of the white-tailed prairie dog would have implications for any future reintroduction of the endangered black-footed ferret into the area.

APPENDIX A
FEDERAL REGISTER
NOTICES OF AVAILABILITY

- Updates on the Federal, State, and educational components of the NCGMP
- Strategic Goals

DATES: March 24–25, 2005 commencing at 9 a.m. on March 24 and adjourning by 5 p.m. on March 25.

FOR FURTHER INFORMATION CONTACT:

Laurel Bybell, U.S. Geological Survey, 908 National Center, Reston, Virginia 20192 (703) 648–5281.

SUPPLEMENTARY INFORMATION: Meetings of the National Cooperative Geologic Mapping Program Advisory Committee are open to the Public.

P. Patrick Leahy,

Associate Director for Geology, U.S. Geological Survey.

[FR Doc. 05–2721 Filed 2–10–05; 8:45 am]

BILLING CODE 4310–17–M

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[WY–090–1220–MA]

Notice of Seasonal Closure of Public Lands to Motorized Vehicle Use

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of seasonal closure of certain public lands located in Lincoln County, Wyoming, to all types of motor vehicle use.

SUMMARY: Pursuant to 43 Code of Federal Regulations (CFR) subpart 8364, the Bureau of Land Management (BLM) announces its intentions to close certain BLM-administered public lands to all types of motor vehicle use during the period of January 1 through April 30, annually. This seasonal closure is needed to protect public lands and resources and to minimize stress to wintering elk, moose, pronghorn antelope and mule deer.

This seasonal closure affects public lands located within the Raymond Mountain Wilderness Study Area (WSA), Slate Creek, Rock Creek, and Bridger Creek winter ranges. Except for travel on highways or county roads, motorized vehicle travel within these areas will be allowed only by written authorization from the Kemmerer Field Manager. Personnel of the BLM, Wyoming Game and Fish Department, U.S. Department of Agriculture-APHIS & Forest Service, U.S. Fish & Wildlife Service, and law enforcement personnel are exempt from this closure only when performing official duties. Operators of existing oil and gas facilities may perform maintenance and pumping, as approved, and livestock operators may perform permitted activities.

DATES: This seasonal closure will be effective annually from January 1 through April 30.

FOR FURTHER INFORMATION CONTACT:

Wally Mierzejewski, Outdoor Recreation Planner, or Dale Wondercheck, Wildlife Biologist, Bureau of Land Management, 312 Highway 189 North, Kemmerer, Wyoming 83101. Mr. Mierzejewski or Mr. Wondercheck may also be contacted by telephone at 307–828–4500.

SUPPLEMENTARY INFORMATION: The Kemmerer Resource Management Plan (RMP) Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) states that big game winter ranges may be closed to minimize stress to wintering animals. Prior to effecting seasonal closures the BLM must consult annually with the Wyoming Game and Fish Department. If conditions warrant, the BLM Kemmerer Field Manager may implement a seasonal closure on certain BLM-administered lands and travel ways including existing roads and two-track trails, to all types of motorized vehicle travel (i.e., snowmobiles, all-terrain vehicles, any vehicle including trucks, sport utility vehicles and cars, motorcycles etc.). Crucial big game winter range as identified in the Kemmerer RMP may be closed annually from January 1 through April 30. Use of these areas by non-motorized means is still allowed.

The BLM Kemmerer Field Office is responsible for management of crucial winter range habitat located on public lands within Lincoln County. The Raymond Mountain WSA, Slate Creek, Rock Creek, and Bridger Creek areas are crucial wintering ranges for elk, moose, antelope, and mule deer. Reasons for the closure include the effects of persistent drought and/or severe winter conditions which threaten the health of these wintering wildlife species. Low forage production associated with persistent drought conditions causes animals to go into winter in poor condition. Losses of wintering habitat from development activity can reduce the area available to the wintering animals. These impacts to wintering wildlife are compounded by significant human activity, such as day and night wildlife observation, still and video photography, snowmobiling, and antler gathering. Because of the increased stress the presence of motorized vehicles inflicts on wintering big game during difficult winter periods, the number of animals that could die and the rate of aborting of fetuses on the winter range can increase. This decreases production of young during the following summer. Therefore, closing crucial winter range to

motorized vehicles reduces impacts to wintering big game.

The following BLM-administered lands are included in this closure:

- The Raymond Mountain WSA, located approximately 15 miles north of Cokeville and contains 32,956 acres.
- The Slate Creek area including all BLM-administered lands south of Fontenelle Creek, west and north of Route 189, and east of the crest of Slate Creek Ridge, and contains 111,100 acres.
- The Rock Creek area including all BLM-administered lands south of County Road 204 (Pine Creek Road), west of the crest of Dempsey Ridge, west of Fossil Butte National Monument, north and east of Highway 30, and contains 105,750 acres.
- The Bridger Creek area including all BLM-administered lands south of Highway 30, west of Fossil Ridge, west of Bear River Divide, north of the Uinta—Lincoln County line, east of the Utah—Wyoming border, and southeast of Highway 89, and contains 98,400 acres.

Maps of these areas will be posted with this notice at key locations that provide access into the closure areas, as well as at the Kemmerer Field Office, 312 Highway 189 North, Kemmerer, Wyoming 83101–9710.

Seasonal closure orders may be implemented as provided in 43 CFR, subparts 8341.2 and 8364.1. Violations of this closure are punishable by a fine not to exceed \$1000, and/or imprisonment not to exceed 12 months.

Dated: December 21, 2004.

Robert A. Bennett,
State Director.

[FR Doc. 05–2638 Filed 2–10–05; 8:45 am]

BILLING CODE 4310–22–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[WY–100–04–1310–DB]

Notice of Availability of a Draft Environmental Impact Statement for the Jonah Infill Drilling Project, Sublette County, WY

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of availability of a Draft Environmental Impact Statement (DEIS) for the proposed Jonah Infill Drilling Project and notice of public involvement meeting for the purposes of providing comment on the DEIS.

SUMMARY: Under the National Environmental Policy Act (NEPA), the

Federal Land Policy and Management Act of 1976 (FLPMA) and associated regulations, the Bureau of Land Management (BLM) in cooperation with the State of Wyoming, announces the availability of a DEIS that evaluates, analyzes, and discloses to the public direct, indirect, and cumulative environmental impacts of a proposal to continue to develop a natural gas field by increasing the density of well locations by drilling additional wells. This practice is known as "infill" drilling.

The Jonah Infill Drilling Project (JIDP) area is located approximately 32 miles southeast of Pinedale and 28 miles northwest of Farson, Sublette County, Wyoming. The JIDP area is approximately 30,200 acres in Townships 29 and 30 North, Range 114 West, 6th Principal Meridian. The DEIS analyzes a proposal made by EnCana Oil & Gas (USA) Inc., (EnCana) and BP America Production Company (BP), referred to collectively as "the Companies," to increase development of Federal natural gas resources in an area known as the Jonah Field. The Companies' proposal includes drilling up to 3,100 natural gas wells from existing and new well pads, at a minimum well pad density of 64 well pads per aliquot section (1 wellpad/10 acres), and at a rate of 250 wells per year. The infill drilling is expected to be concentrated in a 21,000 acre portion of the Jonah Field. The proposed life of project (LOP) is 70 to 80 years with the majority of drilling and development activities to occur within the first 8 to 12 years following approval. The proposal also includes constructing or upgrading associated ancillary transportation and transmission facilities within the 30,200 acres project area. The total project area is comprised of: Approximately 28,280 acres of Federal surface and mineral estate administered by the BLM; 1,280 acres of State of Wyoming surface and minerals; and 640 acres of private surface ownership with Federal mineral (split estate).

Under the provisions of NEPA, the State of Wyoming assisted in the preparation of the DEIS as a cooperating agency.

DATES: The DEIS will be available for review for 60 calendar days following the date that the Environmental Protection Agency (EPA) publishes its Notice of Availability (NOA) in the **Federal Register**. The BLM can best use your comments and resource information within the 60 day review period provided above.

The BLM will announce public meetings and other opportunities to submit comments on this project at least 15 days prior to the event.

Announcements will be made through local news media and the Pinedale Field Office's Web site; <http://www.wy.blm.gov/pfo/info.htm>. These meetings will provide the public with the opportunity to submit oral or written comments on the DEIS to the BLM.

ADDRESSES: A copy of the DEIS has been sent to affected Federal, State and local government agencies and to interested parties.

An electronic copy of the DEIS may be viewed or downloaded from the BLM Web site at <http://www.wy.blm.gov/pfo>. Copies of the DEIS are available for public inspection at the following BLM office locations:

- Bureau of Land Management, Wyoming State Office, 5353 Yellowstone Road, Cheyenne, Wyoming.

- Bureau of Land Management, Pinedale Field Office, 432 East Mill Street, Pinedale, Wyoming.

FOR FURTHER INFORMATION CONTACT: Contact Ms. Carol Kruse, Project Manager, BLM Pinedale Field Office, 432 East Mill Street, Pinedale, Wyoming 82941. Ms. Kruse may also be reached at (307) 367-5352.

SUPPLEMENTARY INFORMATION: In response to a proposal submitted by the Companies, the BLM published in the March 13, 2003, **Federal Register** a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) and notice of the potential for amendment of the Pinedale Resource Management Plan (RMP).

As described in the NOI, the Companies' original proposal to drill 450 wells in addition to 47 existing wells at the same number of well locations was approved by the BLM in the Environmental Assessment (EA), Finding of No Significant Impact and Decision Record for the Modified Jonah Field II Natural Gas Project, March 2000 (Modified Jonah Field II EA). In September 2002, the Companies submitted a proposal to drill and develop an additional 1,250 wells from 850 well pad locations within the same area analyzed in the Modified Jonah Field II EA. This proposal was based on a well pad spacing of one well pad per 20 to 10 acres. (32 to 64 wells per aliquot section). In November 2003, the Companies submitted a revision to their proposal; this revised proposal is described and analyzed as the "Proposed Action" alternative. The Companies revised their proposal from

drilling and development of an additional 1,250 wells to drilling and development of an additional 3,100 wells. Well location spacing would be dictated by the geologic conditions, such as geologic formations and the location of gas resources. Well pad spacing would vary from one well pad per 5 acres to one well pad per 20 acres.

The DEIS describes in detail and analyzes the impacts of eight alternatives, in addition to the No Action Alternative and the Companies' Proposed Action. The following is a summary of the alternatives:

1. *No Action Alternative*—No additional development would be authorized beyond what is currently authorized as recorded in the March 2000 decision made for Modified Jonah II Project.

2. *Proposed Action*—Up to 3,100 new wells would be drilled and developed. Well pad location spacing would depend on geologic conditions. Drilling rate would be up to 250 wells per year. Operator-committed mitigation measures would be applied.

3. *Alternative A*—This alternative proposes to maximize economic recovery of gas resources. Up to 3,100 new wells would be drilled and developed. Well pad location would depend on geologic conditions. Drilling and well development rates would vary between 75 and 250 wells per year. No "operator-committed" mitigation measures would apply, but some BLM-standard mitigation measures would be applied.

4. *Alternative B*—This alternative proposes activities that would minimize surface disturbance within the project area. No new well pads would be constructed and existing well pads would be expanded to accommodate additional directionally drilled wells as appropriate. Drilling and well development rates would vary between 75 and 250 wells per year. The Companies would agree to some "operator committed" mitigation and some mitigation measures would be required in addition to standard mitigation measures.

5. *Alternative C*—This alternative proposes activities that would allow a moderate level of surface disturbance. Up to 1,250 new wells would be drilled and developed. Drilling and development rates would vary between 75 and 250 wells per year. The Companies would agree to some "operator committed" mitigation and some mitigation measures would be required in addition to standard mitigation measures.

6. *Alternative D*—This alternative proposes activities that would allow an

intermediate level of surface disturbance. Up to 2,200 new well pads would be drilled and developed. Drilling and development rates would vary between 75 and 250 wells per year. The Companies would agree to some "operator committed" mitigation and some mitigation measures would be required in addition to standard mitigation measures.

7. *Alternative E*—This alternative proposes to restrict well pad spacing to 16 well pads per aliquot section or 1 well pad per 40 acres. Up to 3,100 new wells and up to 266 new well pads would be drilled and developed. Drilling and well development rates would vary between 75 and 250 wells per year. The Companies would agree to some "operator committed" mitigation and some mitigation measures would be required in addition to standard mitigation measures.

8. *Alternative F*—This alternative proposes to restrict well pad spacing to 32 well pads per aliquot section, or 1 well pad per 20 acres. Up to 3,100 new wells and up to 1,208 well pads would be drilled and developed. Drilling and well development rates would vary between 75 and 250 wells per year. The Companies would agree to some "operator committed" mitigation and some mitigation measures would be required in addition to standard mitigation measures.

9. *Alternative G*—This alternative proposes to restrict well pad spacing to 64 well pads per aliquot section, or 1 well pad per 10 acres. The Companies would agree to some "operator committed" mitigation and some mitigation measures would be required in addition to standard mitigation measures.

10. *Agency Preferred Alternative*—This alternative would allow up to 3,100 new wells from a variable number of well pads to be drilled and developed. Three drilling density zones in the project area would govern surface well pad location. The drilling rate is 250 well per year. In addition to "operator committed" mitigation on-site, the Companies would agree to conduct off-site mitigation and an accelerated reclamation schedule.

Features common to all action alternatives: Exploration of unexplored formations; inclusion of the north half of Section 23, T. 28 N., R. 109 W. as a similar action for analysis purposes; development of ancillary facilities, including but not limited to a new warehouse, expansion of existing compressor stations, and new/expanded water disposal facilities; some degree of upgrade of the Burma Road; and an average Life of Field (LOF) of 70 to 80

years beginning with project authorization through reclamation.

Disposition of Potential for Amendment of the Pinedale RMP: Based on a review of information and comments received in response to the NOI and during the preparation of the DEIS, the Pinedale Field Manager has determined that this proposal is in conformance with the Pinedale RMP (1988). Postponing this DEIS until the Pinedale RMP revisions, that are currently underway, are completed, would not be in the public interest nor a timely agency response to the Companies' proposal made in 2001. Therefore, no amendment to the Pinedale RMP will be made as a result of analyses conducted for this DEIS.

How To Submit Comments

The BLM welcomes your comments on the JIDP DEIS. The BLM asks that those submitting comments make them as specific as possible with reference to chapters, page numbers, and paragraphs in the DEIS document. Comments that contain only opinions or preferences will not receive a formal response; however, they will be considered, and included, as part of the BLM decision-making process. The most useful comments will contain new technical or scientific information, identify data gaps in the impact analysis, or provide technical or scientific rationale for opinions or preferences.

Written comments may be mailed directly or delivered to the BLM at: Jonah Infill Drilling Project DEIS, Project Manager, Bureau of Land Management, Pinedale Field Office, 432 East Mill Street, P.O. Box 768, Pinedale, Wyoming 82941.

You may send comments electronically to WYMail_Jonah_Infill@blm.gov. Please put "Attention: Carol Kruse" in the subject line. Comments submitted by facsimile will not be accepted or considered.

To receive full consideration by the BLM all DEIS comment submittals must include the commenter's name and street address.

Comments, including the names and street addresses of each respondent, will be available for public review at the BLM office listed above during regular business hours (8 a.m. to 4:30 p.m.), Monday through Friday, except for Federal holidays. Your comments may be published as part of the EIS process. Individual respondents may request confidentiality. If you wish to withhold your name or street address, or both, from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the

beginning of your written comments. Such requests will be honored to the extent allowed by law. We will not consider anonymous comments. All submissions from organizations or businesses will be made available for public inspection in their entirety.

Robert A. Bennett,

State Director.

[FR Doc. 05-2636 Filed 2-10-05; 8:45 am]

BILLING CODE 4310-22-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[WY-100-05-1310-DB]

Notice of Meeting of the Pinedale Anticline Working Group's Transportation Task Group

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of public meeting.

SUMMARY: In accordance with the Federal Land Policy and Management Act (1976) and the Federal Advisory Committee Act (1972), the U.S. Department of the Interior, Bureau of Land Management (BLM) Pinedale Anticline Working Group (PAWG) Transportation Task Group (subcommittee) will meet in Pinedale, Wyoming, for a business meeting. Task Group meetings are open to the public.

DATES: A PAWG Transportation Task Group meeting is scheduled for March 8, 2005, from 1 p.m. until 5 p.m.

ADDRESSES: The meeting of the PAWG Transportation Task Group will be held in the Board Room of the Pinedale Library at 155 S. Tyler Ave., Pinedale, WY.

FOR FURTHER INFORMATION CONTACT: Bill Wadsworth, BLM/Transportation TG Liaison, Bureau of Land Management, Pinedale Field Office, 432 E. Mills St., PO Box 738, Pinedale, WY, 82941; 307-367-5341.

SUPPLEMENTARY INFORMATION: The Pinedale Anticline Working Group (PAWG) was authorized and established with release of the Record of Decision (ROD) for the Pinedale Anticline Oil and Gas Exploration and Development Project on July 27, 2000. The PAWG advises the BLM on the development and implementation of monitoring plans and adaptive management decisions as development of the Pinedale Anticline Natural Gas Field (PAPA) proceeds for the life of the field.

After the ROD was issued, Interior determined that a Federal Advisory Committees Act (FACA) charter was required for this group. The charter was

DEPARTMENT OF THE INTERIOR**Bureau of Land Management****[WY-100-05-1310-DB]****Notice of Intent To Prepare Supplemental Information for the Jonah Infill Drilling Project Environmental Impact Statement, Pinedale, WY****AGENCY:** Bureau of Land Management, Interior.**ACTION:** Notice of intent.

SUMMARY: Under Section 102 (2) (C) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Bureau of Land Management (BLM) Pinedale Field Office announces its intent to prepare supplemental information regarding the potential impacts to air quality of a proposed natural gas development project. On February 11, 2005, the BLM published in the **Federal Register** a Notice of Availability of a Draft Environmental Impact Statement (DEIS) for the Jonah Infill Drilling Project (JIDP) for public review and comment. The BLM will continue to accept comments from the public on only the air quality information presented in the DEIS.

DATES: Effective April 12, 2005, this notice provides the public additional time to continue to submit comments on only the air quality information presented in the JIDP DEIS. When the supplemental information is available for public review and comment, the BLM will publish a Notice of Availability in the **Federal Register** and provide the public with the opportunity to review and comment. In addition, announcements will be made through local media and posted on the BLM-Wyoming's Web site: <http://www.wy.blm.gov>.

ADDRESSES: A copy of the DEIS has been sent to affected Federal, State and local Government agencies and to other interested parties. An electronic copy of the DEIS may be viewed or downloaded from the BLM Web site at <http://www.wy.blm.gov/pfo>. Copies of the DEIS are available for public inspection at the following BLM office locations:

- Bureau of Land Management, Wyoming State Office, 5353 Yellowstone Road, Cheyenne, Wyoming.
- Bureau of Land Management, Pinedale Field Office, 432 East Mill Street, Pinedale, Wyoming.

FOR FURTHER INFORMATION CONTACT: BLM Pinedale Field Office, Carol Kruse, Project Manager, 432 East Mill Street, Pinedale, Wyoming, P.O. Box 768

Pinedale, Wyoming 82941. Ms. Kruse may also be reached at (307) 367-5352.

SUPPLEMENTARY INFORMATION: Please note that public comments and information submitted regarding this project, including names, e-mail addresses, and street addresses of the respondents, will be available for public review and disclosure at the above address during regular business hours (7:45 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name, email address, or street address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your written comment. Such requests will be honored to the extent allowed by the law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Dated: April 1, 2005.

Robert A. Bennett,*State Director.*

[FR Doc. 05-7418 Filed 4-8-05; 1:51 pm]

BILLING CODE 4310-22-P**DEPARTMENT OF THE INTERIOR****Bureau of Land Management****[AZ-910-0777-XP-241A]****State of Arizona Resource Advisory Council Meeting****AGENCY:** Bureau of Land Management, Interior.**ACTION:** Arizona Resource Advisory Council Meeting notice.

SUMMARY: This notice announces a meeting and tour of the Arizona Resource Advisory Council (RAC).

The business meeting will be held on May 3, 2005, in Kingman, Arizona, at the Dambar and Steakhouse banquet room located on 1960 E. Andy Devine Avenue. It will begin at 9:30 a.m. and conclude at 4:30 p.m. The agenda items to be covered include: Review of the January 25, 2005 Meeting Minutes; BLM State Director's Update on Statewide Issues; Presentations on Federal Land Recreation Enhancement Act, Designated Off-Highway Vehicle Areas, and Arizona Land Use Planning Updates; RAC Questions on Written Reports from BLM Field Managers; Field Office Rangeland Resource Team Proposals; Reports by the Standards and

Guidelines, Recreation, Off-Highway Vehicle Use, Public Relations, Land Use Planning and Tenure, and Wild Horse and Burro Working Groups; Reports from RAC members; and Discussion of future meetings. A public comment period will be provided at 11 a.m. on May 3, 2005, for any interested publics who wish to address the Council.

On May 4, the RAC will tour the Pine Lake subdivision in the Hualapai Mountains. BLM will highlight the fuel reduction projects, thinning and prescribed fire, it's jointly conducting with the Pine Lake Working Group to protect the area from catastrophic wildfires. The tour will be conducted from approximately 8 a.m. to 1 p.m.

FOR FURTHER INFORMATION CONTACT: Deborah Stevens, Bureau of Land Management, Arizona State Office, 222 North Central Avenue, Phoenix, Arizona 85004-2203, (602) 417-9215.

Elaine Zielinski,*Arizona State Director.*

[FR Doc. 05-7279 Filed 4-11-05; 8:45 am]

BILLING CODE 4310-32-P**INTERNATIONAL TRADE COMMISSION****[Inv. No. 337-TA-503]****Certain Automated Mechanical Transmission Systems for Medium-Duty and Heavy-Duty Trucks and Components Thereof; Termination of Investigation; Issuance of a Limited Exclusion Order and a Cease and Desist Order****AGENCY:** International Trade Commission.**ACTION:** Notice.

SUMMARY: Notice is hereby given that the U.S. International Trade Commission has terminated the above-captioned investigation in which it has found a violation of section 337 of the Tariff Act of 1930 and has issued a limited exclusion order and a cease and desist order.

FOR FURTHER INFORMATION CONTACT: Rodney Maze, Esq., Office of the General Counsel, U.S. International Trade Commission, 500 E Street, SW., Washington, DC 20436, telephone (202) 205-3065. Copies of non-confidential documents filed in connection with this investigation are or will be available for inspection during official business hours (8:45 a.m. to 5:15 p.m.) in the Office of the Secretary, U.S. International Trade Commission, 500 E Street, SW., Washington, DC 20436, telephone (202) 205-2000. General

information concerning the Commission may also be obtained by accessing its Internet server (<http://www.usitc.gov>). The public record for this investigation may be viewed on the Commission's electronic docket (EDIS) at <http://edis.usitc.gov>. Hearing-impaired persons are advised that information on this matter can be obtained by contacting the Commission's TDD terminal on (202) 205-1810.

SUPPLEMENTARY INFORMATION: This patent-based section 337 investigation was instituted by the Commission on January 7, 2004, based on a complaint filed by Eaton Corporation ("Eaton") of Cleveland, Ohio. 69 FR 937 (January 7, 2004). The complaint, as supplemented, alleged violations of section 337 of the Tariff Act of 1930 in the importation into the United States, the sale for importation, and the sale within the United States after importation of certain automated mechanical transmission systems for medium-duty and heavy-duty trucks, and components thereof, by reason of infringement of claim 15 of U.S. Patent No. 4,899,279 ("the '279 patent"); claims 1-20 of U.S. Patent No. 5,335,566 ("the '566 patent"); claims 2-4 and 6-16 of U.S. Patent No. 5,272,939 ("the '939 patent"); claims 1-13 of U.S. Patent No. 5,624,350 ("the '350 patent"); claims 1, 3, 4, 6-9, 11, 13, 14, 16 and 17 of U.S. Patent No. 6,149,545 ("the '545 patent"); and claims 1-16 of U.S. Patent No. 6,066,071 ("the '071 patent").

The complaint and notice of investigation named three respondents ZF Meritor, LLC of Maxton, North Carolina, ZF Friedrichshafen AG of Friedrichshafen, Germany, and ArvinMeritor, Inc. ("ArvinMeritor") of Troy, Michigan.

On July 21, 2004, the Commission issued a notice that it had determined not to review the ALJ's initial determination ("ID") (Order No. 20) terminating the investigation as to the '071 patent and as to claims 2, 3, and 5-20 of the '566 patent, claims 4, 7, and 12 of the '350 patent, and claims 4, 8-9, and 14 of the '545 patent.

On August 11, 2004, the Commission issued a notice that it had determined not to review the ALJ's ID (Order No. 31) terminating the investigation as to the '939 patent and as to claims 10, 11, and 13 of the '350 patent.

On August 16, 2004, the Commission issued a notice that it had determined not to review the ALJ's ID (Order No. 28) that Eaton has satisfied the economic prong of the domestic industry requirement as to certain articles it alleges practice the patents at issue in this investigation.

On August 23, 2004, the Commission issued a notice that it had determined not to review the ALJ's ID (Order No. 30) that Eaton did not meet the technical prong of the domestic industry requirement as to the remaining claims, claims 1-3, 5, 6, 8, and 9, of the '350 patent, thus terminating the investigation as to that patent.

On September 17, 2004, the Commission issued a notice that it had determined not to review the ALJ's ID (Order No. 38) granting Eaton's partial summary determination that the importation requirement has been met.

On September 23, 2004, the Commission issued a notice that it had determined not to review the ALJ's ID (Order No. 45) granting Eaton's motion for summary determination that it satisfies the economic prong of the domestic industry requirement of section 337 as to its medium-duty automated transmissions. The Commission also issued a notice on September 23, 2004, that it had determined not to review ALJ's ID (Order No. 55) granting Eaton's motion for partial termination of the investigation as to claim 1 of the "566 patent.

On January 7, 2005, the ALJ issued his final ID on violation and his recommended determination on remedy and bonding. The ALJ found a violation of section 337 by reason of infringement of claim 15 of the '279 patent by respondents. He found no violation of section 337 regarding the '566 and the '545 patents. Petitions for review were filed by Eaton, the respondents, and the Commission investigative attorney on January 21, 2005. All parties filed responses to the petitions on January 28, 2005.

On February 24, 2005, the Commission issued a notice indicating that it had determined not to review the ALJ's final ID on violation, thereby finding a violation of section 337. The Commission also invited the parties to file written submissions regarding the issues of remedy, the public interest and bonding, and provided a schedule for filing such submissions.

Having reviewed the record in this investigation, including the parties' written submissions and responses thereto, the Commission determined that the appropriate form of relief in this investigation is a limited exclusion order prohibiting the unlicensed entry of automated mechanical transmission systems for medium-duty and heavy-duty trucks, and components thereof covered by claim 15 of the '279 patent. The order covers automated mechanical transmission systems for medium-duty and heavy-duty trucks, and components

thereof that are manufactured abroad by or on behalf of, or imported by or on behalf of the respondents, or any of their affiliated companies, parents, subsidiaries, or other related business entities, or their successors or assigns. The limited exclusion order does not cover parts necessary to service infringing automated mechanical transmission systems installed on trucks prior to the issuance of the order.

The Commission also determined to issue a cease and desist order prohibiting ArvinMeritor from importing, selling, marketing, advertising, distributing, offering for sale, transferring (except for exportation), and soliciting U.S. agents or distributors for automated mechanical transmission systems for medium-duty and heavy-duty trucks, and components thereof covered by claim 15 of the '279 patent.

The Commission further determined that the public interest factors enumerated in sections 337(d)(1) and (f)(1), 19 U.S.C. 1337(d)(1) and (f)(1), do not preclude issuance of either the limited exclusion order or the cease and desist order. In addition, the Commission determined that the amount of bond to permit temporary importation during the Presidential review period shall be in the amount of 100 percent of the entered value of the imported articles. Finally, the Commission determined to deny both the complainant's motion to strike and the respondents' motion for leave to file a surreply. The Commission's orders and opinion in support thereof were delivered to the President on the day of their issuance.

The authority for the Commission's determination is contained in section 337 of the Tariff Act of 1930, as amended (19 U.S.C. 1337), and in section 210.50 of the Commission's Rules of Practice and Procedure (19 CFR 210.50).

Issued: April 7, 2005.

By order of the Commission.

Marilyn R. Abbott,

Secretary to the Commission.

[FR Doc. 05-7298 Filed 4-11-05; 8:45 am]

BILLING CODE 7020-02-P

INTERNATIONAL TRADE COMMISSION

[Investigation No. TA-2103-1]

The Impact of Trade Agreements Implemented Under Trade Promotion Authority

AGENCY: United States International Trade Commission.

CFR 1500–1508) and related applicable Federal laws, Executive Orders, and regulations.

Background: The Barton Springs Ecosystem is dependent upon adequate spring flow from the Barton Springs segment of the Edwards Aquifer to support endangered species. Cessation of spring flow in the Barton Springs Ecosystem may result in “take” of listed species and an appreciable reduction in the likelihood of survival and recovery of listed species. Due to the growing water use anticipated in the Barton Springs segment of the Edwards Aquifer, a comprehensive management plan may be necessary to assure the sustained spring flow in the Barton Springs Ecosystem.

The Service proposes to prepare a draft EIS to evaluate the impacts of alternatives associated with issuing an incidental take permit under section 10(a)(1)(B) of the Endangered Species Act of 1973, as amended (Act). Section 9 of the Act prohibits the taking of Federally listed species, unless authorized under the provisions of Section 7 or 10 of the Act. The term “take” under the Act includes actions that may directly kill or injure listed species, actions that significantly disrupt normal behavioral patterns such as feeding and breeding, and actions that detrimentally modify habitat to the extent that harms individuals of the species.

Section 10(a)(1)(B) allows the Service to permit taking of listed species, provided that taking is incidental to an otherwise legal activity, and that it will not jeopardize a listed species. The applicant must submit an HCP as part of the incidental take permit application.

Proposed Action: The District will consider adoption of an HCP consistent with the Service’s Barton Springs Salamander (Draft) Recovery Plan (January 2005) and with Sections 9 and 10 of the Act. The District’s proposed HCP will consider a comprehensive approach to protect Federally listed species and their habitats that may be affected by groundwater withdrawals from the aquifer. Activities proposed for consideration under the Permit may include management and permitting of certain water withdrawals from the Edwards Aquifer within the jurisdiction of the District, and habitat conservation measures to mitigate impacts of changes in flows of Barton Springs.

Comments Requested: The Service is soliciting information and comments on the scope of issues to be addressed in the draft EIS. The NEPA process is intended to aid public officials to make decisions based on the understanding of

environmental consequences and take actions that protect, restore, and enhance the human environment. NEPA scoping procedures are intended to ensure that information on the proposed action, alternatives, and impacts are solicited from the public and that all information is available to public officials and citizens before planning decisions are made. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. NEPA documents concentrate on the issues that are significant to the action in question. The Service invites the public to submit information and comments either in writing or at the scheduled meeting. The Austin meeting is scheduled for 5 p.m. on August 23, 2005, at the Lady Bird Johnson Wildflower Center, 4801 La Crosse Avenue in Travis County, Texas. The Service requests that comments be as specific as possible.

Major environmental and species concerns in this scoping process include the direct, indirect, and cumulative impacts that implementation of the proposal could have on endangered and candidate listed species, other environmental resources, and the quality of the human environment. Other relevant issues include effects of aquifer and water withdrawal levels on Barton Springs flows, effect of various aquifer water use management options, and alternative water supply options on the environments affected by those options.

The Service is gathering information necessary for the preparation of an EIS. Information regarding the following topics would assist the Service in assessing the impacts of the proposed issuance of an incidental take permit under the provisions of an HCP: The hydrogeology of the Barton Springs segment of the Edwards Aquifer and the effects of aquifer levels on spring flows at Barton Springs as they relate to the habitat needs of Federally listed species; potential water conservation measures and strategies to reduce the withdrawal demands on the Edwards Aquifer and their negative effects on spring flows; alternate water supplies and their potential effect on reducing Edwards Aquifer water withdrawals and maintaining spring flows; effects of aquifer level management and spring flow changes on the quality of the issues; the impact of no action; or suggestions that would be relevant toward the Service’s review and development of alternatives.

In addition to considering impacts on listed species and their habitat, the EIS must include information on impacts from the proposal and alternatives to the

proposal on other components of the human environment. These other components include such things as air and water quality, cultural resources, other fish and wildlife species, social resources, and economic resources.

Joy E. Nicholopoulos,

*Acting Regional Director, Region 2,
Albuquerque, New Mexico.*

[FR Doc. 05–15804 Filed 8–8–05; 8:45 am]

BILLING CODE 4510–55–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[WY–100–05–1310–DB]

Notice of Availability of Supplemental Air Quality Information for the Draft Environmental Impact Statement for Jonah Infill Drilling Project, Pinedale, Wyoming

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of availability of supplemental information and its public review period

SUMMARY: The Bureau of Land Management (BLM) announces the availability of supplemental air quality analyses and information prepared for the Draft Environmental Impact Statement (DEIS) for the Jonah Infill Drilling Project (JIDP), Sublette County, Wyoming. The supplemental information will be available to the public for a 60-day review and comment period.

DATES: The supplemental air quality information will be available for review for 60 calendar days starting on the date this notice is published in the **Federal Register**. The BLM can best use your comments within this 60-day review period.

ADDRESSES: A copy of the supplemental air quality information is available for public inspection during regular business hours (8 a.m. to 4:30 p.m., Monday through Friday) at the following BLM office locations:

- Bureau of Land Management, Wyoming State Office, 5353 Yellowstone Road, Cheyenne, Wyoming.
- Bureau of Land Management, Pinedale Field Office, 432 East Mill Street, Pinedale, Wyoming.

The document may be available electronically on the following Web site: <http://www.wy.blm.gov/nepa/nepadocs.htm>. If you wish to review the information electronically, please check with the Pinedale Field Office as to the availability of BLM Internet documents.

FOR FURTHER INFORMATION CONTACT: For information regarding the JIDP DEIS, contact Carol Kruse, Project Manager, Pinedale Field Office, 432 E. Mill Street, P.O. Box 768, Pinedale, Wyoming 82941. For technical air quality information contact Susan Caplan, Meteorologist, BLM, Wyoming State Office, 5353 Yellowstone Road, Cheyenne, Wyoming 82009. Ms. Kruse and Ms. Caplan may be contacted by telephone at (307) 367-5352 and (307) 775-6113, respectively.

SUPPLEMENTARY INFORMATION: On February 11, 2005, the BLM published in the **Federal Register** a Notice of Availability of a DEIS for the JIDP for public review and comment. On April 12, 2005, the BLM published notification in the **Federal Register** of its intent to prepare supplemental air quality information for the JIDP DEIS. Until the analyses and supplemental information were completed, the public was provided with additional time to submit comments on the air quality information contained in the DEIS. The analyses have been completed and the supplemental air quality information is now available for review.

A summary of the supplemental air quality information has been sent to affected Federal, State, and local government agencies and to interested parties. A copy of the full report is available from the Pinedale Field Office upon request.

How To Submit Comments

The BLM welcomes your comments on the supplemental air quality information prepared for the JIDP DEIS. The BLM asks that your comments specifically reference page number and paragraph in the report, where possible. Comments that contain only opinions or preferences will not receive a formal response; they will, however, be considered and included as part of the BLM decisionmaking process.

Written comments may be mailed directly or delivered to the BLM at: Jonah Infill Drilling Project DEIS, Project Manager, Bureau of Land Management, Pinedale Field Office, 432 East Mill Street, P.O. Box 768, Pinedale, Wyoming 82941.

You may also send your comments electronically to WYMail_Jonah_Infill@blm.gov. Please write "Attention: Carol Kruse" in the subject line.

To ensure full consideration by the BLM, all comment submittals must include the commenter's name and street address.

Comments, including the names and street addresses of each respondent, will be available for public review at the

Pinedale Field Office during regular business hours, Monday through Friday, except for Federal holidays. You comments may be published as part of the EIS process. Individual respondents may request confidentiality. If you wish to withhold your name or street address, or both, from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your written comments. Such requests will be honored to the extent allowed by law. We will not consider anonymous comments. All submissions from organizations or businesses will be made available for public inspection in their entirety.

Dated: June 21, 2005.

Alan L. Kesterke,

Associate State Director.

[FR Doc. 05-15808 Filed 8-8-05; 8:45 am]

BILLING CODE 4310-22-M

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[CO-200-0777-XZ-241A]

Notice of Meeting, Front Range Resource Advisory Council (Colorado)

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of public meeting.

SUMMARY: In accordance with the Federal Land Policy and Management Act (FLPMA) and the Federal Advisory Committee Act of 1972 (FACA), the U.S. Department of the Interior, Bureau of Land Management (BLM) Front Range Resource Advisory Council (RAC), will meet as indicated below.

DATES: The meeting will be held September 7, 2005 from 9:15 a.m. to 4 p.m.

ADDRESSES: Holy Cross Abbey Community Center, 2951 E. Highway 50, Canon City, Colorado 81212.

FOR FURTHER INFORMATION CONTACT: Ken Smith, (719) 269-8500.

SUPPLEMENTARY INFORMATION: The 15 member Council advises the Secretary of the Interior, through the Bureau of Land Management, on a variety of planning and management issues associated with public land management in the Royal Gorge Field Office and San Luis Valley, Colorado. Planned agenda topics include: Manager updates on current land management issues; current realty actions and travel management planning. All meetings are open to the public. The public is encouraged to make oral comments to the Council at 9:30 a.m. or written

statements may be submitted for the Councils consideration. Depending on the number of persons wishing to comment and time available, the time for individual oral comments may be limited. Summary minutes for the Council Meeting will be maintained in the Royal Gorge Field Office and will be available for public inspection and reproduction during regular business hours within thirty (30) days following the meeting. Meeting Minutes and agenda (10 days prior to each meeting) are also available at: http://www.blm.gov/rac/co/fracc/co_fr.htm.

Dated: August 2, 2005.

Roy L. Masinton,

Royal Gorge Field Manager.

[FR Doc. 05-15702 Filed 8-8-05; 8:45 am]

BILLING CODE 4310-JB-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[ID-300-1020-PH]

Notice of Public Meeting, Idaho Falls District Resource Advisory Council Meeting

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of public meeting.

SUMMARY: In accordance with the Federal Land Policy and Management Act (FLPMA) and the Federal Advisory Committee Act of 1972 (FACA), the U.S. Department of the Interior, Bureau of Land Management (BLM) Idaho Falls District Resource Advisory Council (RAC), will meet as indicated below.

DATES: The meeting will be held September 7 and 8, 2005 at the BLM Salmon Field Office, 50 U.S. Highway 93 South in Salmon, Idaho. The meeting will start at 1 p.m. September 7, with the public comment period as the first agenda item. The meeting will adjourn at or before 3 p.m. on the following day. This will be the final meeting of the 2004-05 session. The first meeting of the new session will be held in November or December.

SUPPLEMENTARY INFORMATION: The 15-member Council advises the Secretary of the Interior, through the Bureau of Land Management, on a variety of planning and management issues associated with public land management in the BLM Idaho Falls District (IFD), which covers eastern Idaho. At this meeting, topics we plan to discuss include:

- Sage Grouse Conservation strategies for the State of Idaho, if completed and released for public review.

APPENDIX B
DRAFT ENVIRONMENTAL IMPACT STATEMENT
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GERRY HOWE
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400 MOUNTAINVIEW
ROCK SPRINGS, WY 82901

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STATE OF WYOMING
CAPITOL BUILDING
CHEYENNE, WY 82002

TONY GOSAR
CONSULTANT
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SCOTT GROENE
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JACKSON, WY 83001

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POLICY ANALYST
OFFICE OF THE GOVERNOR
STATE CAPITAL
CHEYENNE, WY 82002

GRECHEN DAWN YOST
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ROCK SPRINGS, WY 82901

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ROCK SPRINGS, WY 82901

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HALLIBURTON
TOM ALLEN
P.O. BOX 369
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TROY HOUSEHOLDER
1208 N. ST.
RELIANCE, WY

HOLMES P. MCLISH
633 17TH ST., SUITE 1650
DENVER, CO 80202

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Jonah Infill Drilling Project
Public Comment Analysis Report

JOHN BUNYAK, SUAN JOHNSON, & JOHN NOTAR
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AIR RESOURCES DIVISION
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USDI/BUREAU OF LAND MANAGEMENT
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BUREAU OF LAND MANAGEMENT
LANDER FIELD OFFICE
BOX 589, 125 SUNFLOWER
LANDER, WY 82520

The Bureau of Land Management is preparing an Environmental Impact Statement for a proposed expansion to the Jonah/Modified Jonah Field II natural gas development project in Sublette County, Wyoming. In order to receive additional information on the project (e.g., EIS, Executive Summaries), you must submit this postcard or a written response to the scoping notice. Please indicate whether you would like to receive the entire EIS text or Executive Summaries. Thank you for your assistance with the NEPA process.

[Mailing Label Here]

*** Please indicate any corrections on this mailing label. Thank you.***

I would like to receive the entire EIS.

I would like to receive only the Executive Summaries.

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[Mailing Label Here]

*** Please indicate any corrections on this mailing label. Thank you.***

I would like to receive the entire EIS.

I would like to receive only the Executive Summaries.

Southwest Wyoming BLM Media List

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- kjohnson@k2tv.com (Ken Johnson- news assignments editor)
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1530 West Main, Lander, WY 82520
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(Here's a note that Kathleen sent to me after I scheduled some Pinedale BLM staffers to do her radio show):

(April 29, 2003): I think what made me realize that I had not sent you a thank you was my intention to let you know about a recent article I wrote regarding the BLM and mining. If you are interested in seeing it, it's running on www.americasvoices.org. The title is Rocks and Rubble on the Rise: Hardrock Mining Gets Deserved Credit. It is on the home page now, but if you don't see this e-mail for a day or so---and you don't see it---just click on my column Reconnecting America (runs on Wednesday to Wednesday) and click on the archives for my name. It will be there under articles written in 2003.

Thanks again for the wonderful follow through on getting the BLM's voice on the radio---we need more of that.

Best regards,
Kathleen
Kathleen P. Jachowski
Solutions - www.jachowskispeaks.com

Jim Kennett **Bloomberg News** jkennett@bloomberg.net
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APPENDIX C
AIR QUALITY SUPPLEMENTAL INFORMATION
DISTRIBUTION LIST

SUPPLEMENTARY AIR QUALITY DOCUMENTS DISTRIBUTION LIST

PC = Postcard notification of availability

AQ = Air quality supplemental documents sent (paper copies)

CD = Air quality supplemental documents sent (electronic copies on CD)

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Jonah Infill Drilling Project
Public Comment Analysis Report

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CLIFFORD DUNCAN P.O. BOX 1892 ROOSEVELT, UT 84066	(PC / ret receipt)	SHOSHONE-BANNOCK TRIBAL OFFICE (PC / ret receipt) DIANA K. YUPE P.O. BOX 306 FORT HALL, ID 83293
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Jonah Infill Drilling Project
Public Comment Analysis Report

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APPENDIX D PUBLIC MEETINGS

Pinedale BLM Schedules Public Meetings to Discuss
Draft EIS for Jonah Infill Drilling Project Proposal

Feb. 24, 2005
Release no. 05-02-07

Contact: Carol Kruse

(307) 367-5352

For Immediate Release

PINEDALE, Wyo. -- The Bureau of Land Management (BLM) in Pinedale has scheduled two public meetings in late March to discuss its Draft Environmental Impact Statement (DEIS) for the Jonah Infill Drilling Project Proposal. Availability of the document was announced in the *Federal Register* on Feb. 11, 2005. That announcement opened a 60-day public review and comment period that concludes on April 12, 2005.

"These meetings will provide the public with a forum to gather information, ask clarifying questions, and provide substantive input in writing on the Jonah Infill Draft EIS," said project lead Carol Kruse. The public meetings will be at the Rock Springs BLM Office on March 21st and at Rendezvous Pointe in Pinedale on March 23rd. Both meetings begin at 3:00 p.m. each day with an open house format. We will have short presentations on the BLM Preferred Alternative at 4:00 p.m. and at 7:00 p.m." Kruse added.

"We need to hear from the citizens most affected by this project – the people of Sublette and surrounding areas," said Prill Mecham, field manager for the Pinedale BLM. The project proposes to expand natural gas drilling and development operations within the existing boundaries of the Jonah Field in south-central Sublette County, Wyo. Operations are proposed for that portion of the Jonah Field referred to as the Jonah Infill Drilling Project Area (JIDPA), located approximately 32 miles southeast of Pinedale and 28 miles northwest of Farson, Wyo.

"One of our biggest concerns is protection of air quality, greater sage-grouse habitats, and antelope migration routes within the public lands that we manage in the Jonah Field," Mecham said.

The Draft EIS identifies nine key issues for consideration:

- amount of surface disturbance

- socioeconomics and boom/bust avoidance
- regional visibility effects
- greater sage-grouse/greater sage-grouse habitat protection
- pronghorn antelope migration corridor protection
- direct and indirect habitat fragmentation and loss for all wildlife species
- maximizing natural gas recovery
- loss of livestock forage and
- BLM monitoring and enforcement capacity.

The document can be viewed or downloaded from the internet at

www.wy.blm.gov/nepa/pfodocs/jonah/index.htm.

The JIDPA encompasses approximately 30,500 acres of mixed surface and mineral estate controlled by federal and state governments and private landowners.

The proposed project is in conformance with the BLM Pinedale and Green River Resource Area Resource Management Plans, the Sublette County Land Use Plan, and the State of Wyoming Land Use Plan. In those Plans, the BLM determined that JIDPA lands are available for natural gas leasing and development.

BLM can best use comments submitted by close of business on Monday, April 12, 2005. Comments should be mailed to: Jonah Infill Drilling Project, BLM-Pinedale Field Office, P.O. Box 768, Pinedale, WY 82941. E-mail comments may be submitted to:

WYMail_Jonah_Infill@blm.gov.

-- <http://www.wy.blm.gov> --

Jonah Infill Drilling Project DEIS

Open House/Public Meeting

Rock Springs, WY March 21, 2005

- 3:00pm Open house – view posters, visit with individual BLM staff
- 4:00pm Brief presentation on BLM Preferred Alternative
- 4:20pm Question and answer period
- 4:45pm Open house – view posters, visit with individual BLM staff
- 7:00pm Brief presentation on BLM Preferred Alternative
(same presentation as at 4:00pm)
- 7:20pm Question and answer period
- 7:45pm Open house – view posters, visit with individual BLM staff
- 8:00pm Close

Jonah Infill Drilling Project DEIS

Open House/Public Meeting

Pinedale, WY March 23, 2005

- 3:00pm Open house – view posters, visit with individual BLM staff
- 4:00pm Brief presentation on BLM Preferred Alternative
- 4:20pm Question and answer period
- 4:45pm Open house – view posters, visit with individual BLM staff
- 7:00pm Brief presentation on BLM Preferred Alternative
(same presentation as at 4:00pm)
- 7:20pm Question and answer period
- 7:45pm Open house – view posters, visit with individual BLM staff
- 8:00pm Close

Overview of BLM Preferred Alternative for Managing the Jonah Infill Drilling Project



Goal:

Manage development in the Jonah Infill Drilling Project Area (JIDPA) to optimize both recovery of natural gas and long-term protection of other resources



How to do that?



with

- World class wildlife habitat (particularly greater sage-grouse)
- World class clean air and water
- World class visual resources
- Multiple use demands and
- World class natural gas resources

all in the same place?

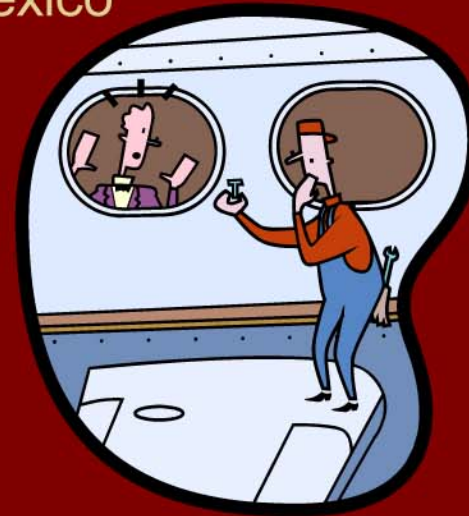
Manage by performance- or outcome-based objectives

- Define desired outcome or performance
- Let innovation and technology determine how those objectives are achieved
- Monitor continually and manage adaptively to assure those objectives are being achieved throughout the life of the project (LOP)



4 major areas of concern

- **Gas recovery**, national demand and energy policy
- **Greater sage-grouse habitat**, potential for listing as threatened or endangered
- **Hydrology**, widespread topographic alterations, Colorado River system treaty w/ Mexico
- **Air Quality**, quality of life





Gas Recovery

- Approve up to 214 acres of new surface disturbance per 640-ac section within nearly $\frac{1}{2}$ of JIDPA, reducing the need to drill directionally
 - Operators have indicated this is the area most likely to require one bottomhole every 10 acres to recover 85% of gas in place
 - Monitor recovery results

Greater Sage-grouse habitat

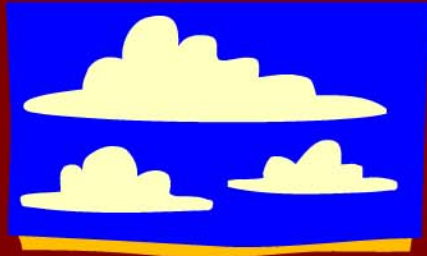
- Approve up to 118 acres of new surface disturbance per 640-ac section within nearly ½ of JIDPA
 - Protects larger patches of remaining Greater sage-grouse habitat that reclamation efforts can build upon
- Limit noise at noise-sensitive sites, reduce human activity levels, Sand Draw NSO maintained
- Monitor noise, species presence-distribution-population trends



Hydrology

- Maintain sediment erosion at WDEQ and BLM-acceptable levels
 - 6th-level watershed modeling
 - Disturbance planned at watershed level using modeling
 - Hydraulic structures designed and engineered using modeling
 - Retention structures when and where necessary
 - Monitor for sediment and salt transport





Air Quality

- Maintain emissions below levels that would exceed standards and concern thresholds
- BLM cannot require AQ mitigation, but operators can commit to mitigation
- Mitigation can take the form of:
 - Road/wellpad dust abatement
 - NOx and particulate engine emission reductions
 - Piping of condensate and produced water to reduce hazardous air pollutant and volatile organic compound emissions and traffic levels
 - Reductions in surface disturbance
 - Monitoring to determine levels and sources



Reclamation is Key

- Establishing viable site-stabilizing plant growth within 2 years of initiation of reclamation (consists of indigenous species and/or ecologically-comparable species as approved by BLM)
- Within 5 years of reclamation initiation, establish at least 50% of indigenous vegetative cover and species composition to maintain soil stability and habitat function (nutritional value, palatability, and vegetative structure)
- Within 8 years, 80% establishment



To Comment –

- Jonah Infill Drilling Project DEIS
BLM-Pinedale
PO Box 768
Pinedale, WY 82941

OR

- WYMail_Jonah_Infill@blm.gov

Emailed or postmarked by midnight, April 12, 2005



**U.S. Department of the Interior
Bureau of Land Management
Pinedale Field Office
Pinedale, Wyoming**

**Open House for Jonah Infill Drilling Project
Draft Environmental Impact Statement**

3/23/2005

LEAVE COMMENTS AT REGISTRATION TABLE OR MAIL THEM TO: Bureau of Land Management; Carol Kruse, Project Manager; Pinedale Field Office; P.O. Box 768, Pinedale, Wyoming 82941. Comments may be emailed to WYMail_Jonah_Infill@blm.gov. Comments must be postmarked or emailed by midnight, April 12, 2005.

Please Read Carefully

Comments, including names and street addresses of respondents will be available for public review at the , Wyoming during regular business hours (7:30 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name/Organization:

Address:

Zip Code:

Comments:
