Attachment A

BLM Response to Public Comment

Comment No.	Commenter	Subject	Comment	Response
1	Wyoming Governor Mead	Support	General Letter of Support	Thank you - Comment Noted
2	Wyoming Legislators	Support	General Letter of Support	Thank you - Comment Noted
3	Cynthia Lummis	Support	General Letter of Support	Thank you - Comment Noted
4	Wyoming Game & Fish Department	Support	General Letter of Support	Thank you - Comment Noted
5	Wyoming Dept. Agriculture	Livestock Grazing	Support the BLM Mitigation Alternative over the Proposed Alternative	Thank you - Comment Noted
6	Wyoming Dept. Agriculture	Livestock Grazing	WDA urges BLM consult, cooperate, and coordinate with livestock grazing permittees in the project area to ensure impacts to their grazing operations are reduced and mitigated.	BLM will continue to consult, cooperate, coordinate with the Operators and grazing permittees in the YRD Project Area.
7	Wyoming Dept. Agriculture	Livestock Grazing	We are opposed to BLM requiring livestock grazing permittees maintain fencing for reclaimed areas or other additions to the Terms and Conditions of their permit as a result of the project.	BLM will coordinate with the Operators and the grazing permittes to make sure the drop down fences are put up prior to the grazing season. Any fencing modifications should not affect Terms and Conditions of the grazing permit.
8	Sublette County Commissioners	Support	General Letter of Support	Thank you - Comment Noted
9	Coalition of Local Governments	SSS- Greater Sage-Grouse	The Proposed Action purports to comply with the BLM's Approved Resource Management Plan Amendment for Greater Sage-Grouse ("ARMPA"). The EA specifically discusses, and states as its Management Decisions 9 and 12 from the ARMPA. The ARMPA Record of Decision, however, was issued on September 23, 2015. *See* 80 Fed. Reg. 53772 (Sep. 23, 2015). The Jonah Infill Record of Decision was issued on March 14, 2006. *See* 71 Fed. Reg. 13157 (Mar. 14, 2006). Thus, it is the position of the Coalition, that the terms of the leases could not and do not include ARMPA management decisions. This does not preclude Jonah Energy, LLC and LINN Operating, Inc. (collectively the "Operators") from voluntarily accepting new terms and thus the EA should so state this legal fact.	Correct, the terms of the leases do not include ARMPA management decisions; however, the BLM would apply the ARMPA management decisions when approving individual APDs.
10	Coalition of Local Governments	SSS- Greater Sage-Grouse	The EA states that "lek attendance would be expected to continue to decline under [the Proposed Action]." EA at 72. Based on recent Wyoming Game and Fish Department lek counts, however, it appears that lek attendance has drastically increased since 2013. In 2013, for the Yellow Point Complex, WGFD counted 183 males and 191 males in 2014. Then in 2015, WGFD counted 446 males. *Id*. The BLM should correct this misstatement and correctly represent the status of sage-grouse in the project area.	The "Current Conditions" section in the YRD EA focuses on the five leks for which a 2-mile buffer coincides with the YRD Pads - not the whole Yellow Point Complex.
11	Coalition of Local Governments	SSS- Greater Sage-Grouse	The EA also appears to base continued declines in lek attendance on noise levels. EA at 71-72. The Coalition strongly disagrees that noise levels of 40 dBA will adversely impact sage-grouse lek attendance. The literature used by BLM to substantiate 40 dBA actually used speakers emitting noises at 70 dBA to reach the conclusions of that study. See Jessica L. Blickley, et al. Experimental Evidence for the Effects of Chronic Anthropogenic Noise on Abundance of Greater Sage-Grouse at Leks, Conservation Biology, Volume 26, No. 3, 461-471 (2012) ("We played drilling noise and road noise on leks at 70 dB(F) sound pressure level (unweighted decibels) measured 16 m directly in front of the speakers... This is similar to noise levels measured approximately 400 m from drilling rigs and main access roads in Pinedale.")(internal figures and citations omitted).	Because the YRD Project Area is located within General Habitat Management Area and not Priority Habitat Managment Area, BLM determined that 30 dBA should be used as the baseline noise level - taken from 7-Day Average of measurements conducted by Behrens and Associates, Inc. in December 2015.
12	Coalition of Local Governments	SSS- Greater Sage-Grouse	The Coalition supports the Proposed Action as a method of minimizing the disturbed area. The Coalition would urge the BLM and the Operators to work closely with local governments to employ the most successful reclamation practices for a particular site. Interim reclamation and final reclamation may require a full spectrum of methods including stabilization, soil amendments, irrigation, and sterile non-native seed mixes to successfully return the site to its potential.	Thank you - Comment Noted
13	Coalition of Local Governments	SSS- Greater Sage-Grouse	The Coalition has repeatedly commented that year-round development of natural resources is highly preferred due to several important factors. Year round development provides consistent and predictable revenue instead of boom and bust growth cycles. Consistent revenues in turn allow planning and community development based on a steady economic driver. Year round development also requires year round workers and projects such as this one encourage long term immigration to otherwise rural communities. Finally, year round projects facilitate working relationships between energy producers, livestock permittees, and local governments	Thank you - Comment Noted

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14	Enterprise Products	Support	General Letter of Support	Thank you - Comment Noted
15	Petroleum Assoc. Wyoming	Support	General Letter of Support	Thank you - Comment Noted
16	Sublette County Chamber of Commerce	Support	General Letter of Support	Thank you - Comment Noted
17	Sublette Economic Resource Council	Support	General Letter of Support	Thank you - Comment Noted
18	Wyoming Business Alliance	Support	General Letter of Support	Thank you - Comment Noted
19	Wyoming County Commissioners Association	Support	General Letter of Support	Thank you - Comment Noted
20	Eastfork Livestock	Support	As a grazing permittee, we are in support and encourage BLM to approve exceptions to existing time limitations on development related to wildlife.	Thank you - Comment Noted
21	Eastfork Livestock	Livestock Grazing	It concerns me to see a letdown fence discussion in a document dealing with drilling, when the responsibility of maintenance is usually done by the permittee. A much more cost effective benefit to sage grouse mortality would be predator control. You might save 10 grouse from striking fences by building an expensive, high maintenance fence, or suing cost effective raven control methods and save 50 sage grouse chicks.	The language in the BLM Mitigation Alternative (Section 2.2 of the EA) is revised as follows: "To mitigate potential impacts to greater sage-grouse and wintering pronghorn, the BLM assessed locations of known greater sage-grouse strikes and known pronghorn crossing locations and existing gates in the YRD Project Area. Based on this assessment, the BLM has identified approximately 3 miles of fence to be converted to drop-down fence and installation of approximately 10 gates or crossing locations. Drop-down fences would be put up prior the beginning of the livestock season each year and would be dropped down by November 1 of each year in coordination with the livestock permittees. " BLM will consult with the Wyoming Game & Fish Department and the U.S. Fish and Wildlife Service to determine what can be done regarding predator control.
22	Jonah Energy and LINN Operating	Proposed Action	The Operators continue to support the Proposed Action. The Operators beleive the Proposed Action appropriately mitigates potential impacts to resources by significantly reducing surface disturbance and traffic when compared to currently authorized development, which is represented in the no action alternative. The Operators do not believe additional mitigation is necessary or required and urge the BLM to adopt the Proposed Action.	Thank you - Comment Noted
23	Jonah Energy and LINN Operating	Proposed Action	Given the significant offsite mitigation that was volunteered as part of the original approval of the Jonah Infill Drilling Project, the Jonah Year-Round Development Project clearly exemplifies a fully mitigated project that should be supported by the BLM. The Operators encourage the BLM to adopt the Proposed Action without additional modifications.	Thank you - Comment Noted

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24	Jonah Energy and LINN Operating	Wildlife - Pronghorn	First, the Operators would appreciate clarification regarding the precise location and length of the let-down fences proposed as part of the BLM Mitigation Alternative. Additionally, the Operators would like additional information regarding the location and number of gates proposed to assist pronghorn movement under the BLM Mitigation Alternative. The Operators understand that approximately one to three miles of let-down fences has been considered and that approximately ten gates are under consideration under the BLM Mitigation Alternative. The Operators request the BLM identify and specify the location of both mitigation measures in the Decision Record for the Year-Round Development Project. The BLM should also clarify the exact nature of the fence modifications proposed under the BLM Mitigation Alternative. The BLM's current description does not define what is expected or envisioned and is, thus, subject to unreasonable or open-ended interpretation. The BLM should also ensure that any private landowners and/or grazing lessees support the placement of let-down fences, gates, or other fence modifications. The BLM also needs to confirm in the Decision Record that the Sublette County Conservation District will be responsible for the actual installation and maintenance of the drop fences.	The language in the BLM Mitigation Alternative (Section 2.2 of the EA) is revised as follows: "To mitigate potential impacts to greater sage-grouse and wintering pronghorn, the BLM assessed locations of known greater sage-grouse strikes and known pronghorn crossing locations and existing gates in the YRD Project Area. Based on this assessment, the BLM has identified approximately 3 miles of fence to be converted to drop-down fence and installation of approximately 10 gates or crossing locations. The fence modifications would be in accordance with WGFD guidance. Drop-down fences would be put up prior the beginning of the livestock season each year and would be dropped down by November 1 of each year in coordination with the livestock permittees. "
25	Jonah Energy and LINN Operating	SSS - Greater Sage-Grouse	The Operators understand the BLM has selected the reasonable, yet very conservative "background" or ambient noise level in the Jonah Project Area to be 30 dBA. Year-Round EA, pg. 59. As noted in the EA, the background noise levels at many of the nearby sage-grouse leks are actually much higher with average levels closer to 35 – 38 dBA. Id. The BLM should carefully explain exactly how the proposed noise limits under the BLM Mitigation Alternative would be measured and enforced. The Operators understand that actual monitoring would not be required during development operations so long as the Operators have demonstrated through modeling that the noise limitation of 40 dBA will not be exceeded at the specified locations during drilling or completion operations. The Operators appreciate the fact that BLM does not specify a particular noise mitigation technique, but is allowing Jonah Energy and LINN the flexibility to determine the most appropriate potential mitigation measures at each location. In order to determine possible mitigation measures for each location, the Operators may conduct location-specific noise studies to determine whether mitigation will be required for the specific pads that will be developed for the upcoming season. Finally, the Operators encourage the BLM to recognize new and emerging science regarding the potential impact, or lack thereof, of noise to sage grouse in the Decision Record.	Mitigation will be required where site-specific modeling predicts noise levels above 40 dBA. Monitoring at the lek permiter is not anticipated to be required.
26	Jonah Energy and LINN Operating	SSS - Greater Sage-Grouse	The BLM also must clarify the fact that under the BLM's BLM Mitigation Alternative that the 40 dBA noise limit would be measured at the Sand Draw Reservoir and the South Rocks leks, not at the pads identified in Section 2.2. The text in the current draft of the EA suggests the noise limits apply at the actual pads rather than the leks. The BLM should clarify this in the Decision Record.	Language in the EA is clarified to indicate that the noise limit would be at the perimeter at the Sand Draw Reservoir and South Rocks leks.
27	Jonah Energy and LINN Operating	SSS - Greater Sage-Grouse	The BLM should also more clearly describe in the document that the modeled noise results presented in Section 3.2.4.2 were based on flat terrain modeling. When actual onsite monitoring occurs, it is very likely noise levels will be below the 40 dBA limit discussed in the Year-Round EA. Although this fact is mentioned in footnotes for Tables 3.2.5, 3.2.6, and 3.2.7, the Operators believe it should have been discussed in more detail within the text of the document in order for the public to understand the issue. The Operators believe this is why the BLM included that language in the BLM Mitigation Alternative.	The following language is added to Section 3.2.4.2: "In Tables 3.2-5 through 3.2-7, results for YRD Pads SHB 77-04 and Cabrito 15-13 are taken from site-specifc modeling, values for all other YRD Pads are based on flat terrain modeling."
28	Jonah Energy and LINN Operating	SSS - Greater Sage-Grouse	The Operators request further clarification regarding the update of the travel plan required by the Jonah ROD. The Operators agree with the management direction in the recently approved Resource Management Plan Amendment to the Pinedale Resource Management Plan (2015) regarding the need to minimize new road construction and to allow for seasonal closures under specific circumstances. The Operators note the Jonah ROD already requires annual transportation planning, the minimization of new roads, and the reclamation of unnecessary roads and routes. The Operators are unclear what additional efforts are required to update the travel management plan required by the Jonah ROD, but are willing to consider reasonable, specific recommendations or directions from the BLM.	The requirement to update the Transportation Plan (Appendix B, Subappendix DP-A to the Jonah ROD) has been removed from the EA. The impacts for travel and transportation are lessened under the Proposed Action and BLM Mitigation Alternatiave over what was analyzed in the Jonah FEIS and authorized in the Jonah ROD.

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29	Jonah Energy and LINN Operating	Proposed Action	Finally, the Operators request clarification under the BLM Mitigation Alternative, and the Proposed Action, acknowledging that the exact location of all 24 pads have not been finally determined in all cases. Although some of the pads have been sited, others are still conceptual and, as stated in the Plan of Development, it may be necessary to replace certain currently identified pads with other pads that have yet to be identified. Jonah Energy and LINN were clear in the Proposed Action that not all the pad sites have been finally located through the normal on-siting and permitting process.	Additional site-specific NEPA may be required for replacement of currently identified YRD Pads with YRD Pads that have not yet been identified.
30	Jonah Energy and LINN Operating	Proposed Action	On page 6, Section 1.0, 1st paragraph, first sentence please replace the word "addressed" with the word "envisioned" in order to more accurately reflect the fact the Jonah Field Final EIS contemplated primarily vertical development on single well pads. It is also important to note that nothing in the Jonah ROD prohibits directional drilling. In fact, the BLM included an alternative in the Jonah Field Final EIS (Alternative B) and the Jonah ROD discusses estimated pad sizes for directional well pads.	BLM disagrees - no change to the EA.
31	Jonah Energy and LINN Operating	Proposed Action	On Page 7, Section 1.1, third paragraph, first sentence, please replace the phrase "is within" with the phase "is consistent with and respects." Doing so makes the phrase more consistent with the language in the Pinedale ROD that recognizes valid existing rights. Wyoming Sage- Grouse ARMPA, pgs. 20, 23, 24, 28, 34, 35, 54, 104; Pinedale RMP, pg.2-19.	BLM disagrees - no change to the EA.
32	Jonah Energy and LINN Operating	Proposed Action	On page 7, Section 1.1, third paragraph, second sentence please replace the phrase "federal government" with the phrase "Department of the Interior" to recognize the specific department authorized by the Mineral Leasing Act to issue federal oil and gas leases. 30 U.S.C. § 226. The Department of Transportation, for example, does not have the authority to issue oil and gas leases.	BLM disagrees - no change to the EA.
33	Jonah Energy and LINN Operating	Proposed Action	On page 8, Section 1.3, first paragraph, third sentence, please insert the word "authorized" before "wells (3600). The BLM should also clarify that the Jonah ROD only authorized 3,100 wells. Jonah ROD, pg. 1. It is correct to note that approximately 500 additional wells had been drilled from 497 pads prior to the release of the Jonah ROD under previous authorizations.	The word "authorized" is inserted before "wells"
34	Ultra Petroleum	Support	The project will provide a net benefit to air, wildlife and biological resources in the area.	Thank you - Comment Noted
35	Ultra Petroleum and QEP Resources	SSS - Greater Sage-Grouse	Because of the overlap of the Yellow Point Complex across the PAPA and the Jonah YRD Project Area, UQ believes the responsibility for sage grouse protection should be shared by the PAPA Operators, as well as the Jonah YRD project proponents. We believe a sage grouse protection strategy should be developed with participation from Ultra, QEP, Jonah Energy and Linn Energy, which would identify specific strategies and shared funding mechanisms between the PAMMF and Jonah YRD project proponents to address lek inactivity or declines in peak male attendance at Yellow Point Complex leks. We would welcome Bureau of Land Management (BLM) participation in and approval of this sage grouse protection strategy, and we believe development of this strategy should be required as a condition of approval of the Jonah YRD EA. This strategy should be developed in the coming months so that it can be implemented concurrent with the Jonah YRD Project.	The following has been added to the BLM Mitigation Alternative (Section 2.2 in the EA): "The BLM would require Jonah Energy and LINN Operating to work with the Pinedale Anticline operators to develop a conservation strategy for the Yellow Point Lek Complex acceptable to the BLM within 1 year."
36	National Wildlife Federation and Wyoming Wildlife Federation	Support	Support of Project - for Greater Sage-Grouse and Pronghorn	Thank you - Comment Noted
37	National Audubon Society and Wilderness Society	SSS - Greater Sage-Grouse	The Draft EA does not appear to include specific mitigation measures to address the impacts of noise on sage-grouse. There is no discussion of what that mitigation involves. We are concerned that the Draft EA, as currently presented to the public, does not contain the requisite "firm commitment" to mitigating the project's noise impacts on Greater sage-grouse.	If modeling shows that noise levels would exceed 40 dBA at the permiter of the Sand Draw Reservoir or South Rocks leks, mitigation would be required. The specific measures have not been identified.
38	National Audubon Society and Wilderness Society	SSS - Greater Sage-Grouse	The Draft EA does not evaluate alternative project configurations, including those that would locate well pads farther away from the two active leks.	Under the Proposed Action and the BLM Mitigation Alternative, well pads are reduced from 245 to 24 - with a resulting reduction in surface disturbance of 1,082 acres - which is an alternative project configuration to the No Action Alternative.

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39	WildEarth Guardians	SSS - Greater Sage-Grouse	In the context of the current proposal, we urge the BLM to fully evaluate the efficacy (or lack thereof) of sage grouse conservation measures incorporated into the Jonah Infill ROD, and to devise and apply as Conditions of Approval additional habitat protections adequate to maintain remaining sage grouse populations and habitats in a viable condition.	Additional habitat protections are included in the BLM Mitigation Alternative such as: reduction of 1,082 acres of surface disturbance, conversion of existing fences to drop-down fences, noise reductions during drilling and completions, and development of a joint conservation strategy for the Yellow Point Lek Complex.
40	WildEarth Guardians	SSS - Greater Sage-Grouse	BLM must identify important sage grouse wintering habitats in and near the project site, and if necessary relocate the wellsite at least 0.6 mile away from the nearest identified wintering habitat.	There are no requirements to be 0.6 mile from wintering habitats. The YRD Project Area does not coincide with officially-designated Winter Concentration Area. BLM acknowledges there are areas adjacent to the YRD Project Area that contain wintering grouse but the areas have not been officially designated as Winter Concentration Areas.
41	WildEarth Guardians	SSS - Greater Sage-Grouse	Ambient noise levels should be defined as 15 dBA and cumulative noise should be limited to 25 dBA in occupied breeding, nesting, brood-rearing, and wintering habitats, which equates to 10 dBA above the scientifically-derived ambient threshold.	Because the YRD Project Area is located within General Habitat Management Area and not Priority Habitat Managment Area, BLM determined that 30 dBA should be used as the baseline noise level - taken from 7-Day Average of measurements conducted by Behrens and Associates, Inc. in December 2015.
42	WildEarth Guardians	SSS - Greater Sage-Grouse	We are concerned that the proposed access routes for the BLM well sites will funnel heavy and light truck traffic through sensitive sage grouse habitats, in close proximity to leks and nesting habitats, and potentially lead to significant reductions in sage grouse populations during the construction/drilling and production phases of the project. Even though new roads may not be constructed, the major increase in vehicle traffic on existing roads has the potential for heavy impacts on sage grouse.	The No Surface Occupancy restriction within 0.25 mile buffer of leks is not waived under any of the alternatives. Drilling and completion activities that would occur during the timing limitation period within the 2 mile buffer of greater sage-grouse leks are short-term. Once wells are operational, traffic, human presence, and surface disturbance under the Proposed Action and BLM Mitigation Alternative would be reduced compared to that authorized by the Jonah ROD (No Action Alternative).
43	WildEarth Guardians	SSS - Greater Sage-Grouse	In addition, the project fails to take a hard look through a misleading economic analysis. On the one hand, BLM claims that the project will lead to economic benefits. But the costs to society of releasing hundreds of thousands of metric tons of carbon-dioxide equivalent is completely ignored or presumed to be zero.	Social costs of carbon analyses are not performed under NEPA. NEPA does not require monetization of economic benefits and costs, and CEQ NEPA regulations state that "the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not when there are important qualitative considerations" (40 CFR § 1502.23). Monetizing only certain effects can lead to an unbalanced assessment. A regional economic impact analysis is often used to estimate impacts on economic activity, expressed as projected changes in employment, personal income, or economic output. Such estimates are not benefits or costs, and are not part of a benefit cost analysis.
44	WildEarth Guardians	SSS - Greater Sage-Grouse	The EA must consider the impacts of hydraulically fracturing these oil and gas wells. BLM should include a discussion of water usage, wildlife impacts, seismic activity, health impacts, or any of the other known impacts of hydraulic fracturing.	BLM disagrees - it is included in the EA.

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45	Upper Green River Alliance	Proposed Action	It could be argued that, because they're not specifically mentioned by name, Linn and Jonah Energy are released from "Operator Committed Practices" commitments. This fact is underscored by BLM's note that, "The 15 air quality related measures listed at the very end of this document have been committed to by EnCana Oil & Gas (USA), Inc., but not yet agreed to by any of the other Operators." (USDA Bureau of Land Management, 2016 p. Att. A) It is doubtful that the high cost of directional drilling and production coupled with the extremely low profit margin will allow financially strapped Linn and Jonah Energy the ability to perform groundwater monitoring, wildlife monitoring and all the other administrative requirements, conditions of approval and mitigation required by the Jonah Infill Drilling Project Record of Decision. (USDA Bureau of Land Management, 2006 p. Att. A)	BLM disagrees and as stated in the EA, development procedures are described in the following: Operator-Committed Practices (Appendix B of the JIDP ROD and Attachment B to the EA) and JIDP Development Procedures Technical Support Document (Aoppendix B to the JIDP FEIS, Volume 2) including the Transportation Plan (Subappendix DP-A), Reclamation Plan (Subappendix DP-B), and Hazardous Materials Management Summary (Subappendix DP-C). In addition, as stated in the EA, the following administrative requirements, COAs, and mitigation would apply under all alternatives (except for seasonal timing limitations for greater sage-grouse and pronghorn crucial winter range) : JIDP Admnistrative Requirements, Conditions of Approval, and Mitigation (Appendix A to the JIDP ROD and Attachment B to the EA); Adaptive Management in the JIDPA (Appendix C to the JIDP ROD and Attachment D to the EA); Mitigation Guidelines and Operating Standards Applied to Surface Disturbing and Disruptive Activities (Appendix 3 to the Pinedale RMP and Attachment E to the EA); Seasonal Wildlife Stipulations for all Surface Disturbing Activities (Appendix 12 to the Pinedale RMP and Attachment F to this EA); and Management Decisions in the ARMPA.
46	Dottie Bentley	Opposition	General Letter of Opposition based on precedent setting for future drilling - by lifting seasonal restrictions.	Thank you - Comment Noted
47	Flora Deru	Opposition	General Letter of opposition to lifting restrictions for sage-grouse and pronghorn	Thank you - Comment Noted
48	Kate Parker	Opposition	General Letter of Opposition	Comment Noted - All wells included in the YRD Project are currently authorized under the JIDP ROD.
49	Elaine Crumpley	SSS Greater Sage-Grouse	If the PFO wants to change the ROD it should follow the proper path and institue a new EIS for the entire Jonah or at least an EIS for year-round development. New and updated information from the PAPA and what the PFO has learned about the Anticline could and should be applied to its next-door neighbor.	The analysis shows that there are no "new" significant impacts.
50	Carmel Kail	SSS Greater Sage-Grouse	Reconcile sage grouse winter concentration locational information. The Sage Grouse Winter concentration area map (JYRD EA p. 4) does not appear to match the Grouse Winter Concentration areas depicted on the PAPA Greater Sage Grouse Annual Report 2014-2015 page 24. Please reconcile and/or clarify the situation.	The YRD Project Area does not coincide with officially-designated Winter Concentration Area. BLM acknowldedges there are areas adjacent to the YRD Project Area that contain wintering grouse but the areas have not been officially designated as Winter Concentration Area.
51	Carmel Kail	SSS Greater Sage-Grouse	Sage grouse seasonal restriction rationale and consequences of their waiver merits additional clarification. Please explain the rationale underlying the 2006 JIDP ROD application of sage grouse seasonal restrictions and the resulting effects of those requirements (reduced impact pace etc.). (Perhaps put in Project Background section or Special Status Animal existing environment or both.) Also please specifically address how granting exception to these existing restrictions would change project effects to the species (reduce biological adaptation opportunity; foreshorten scientific study and regulatory opportunities). (Perhaps add on to Special Status Animal NO ACTION Consequences ?)	The effects to the species may not specifically change compared to those effects analyzed in the JIDP FEIS and may occur in a shortened timeframe; however, implementation of the YRD Project would result in 1,082 acres less surface disturbance compared to that analyzed in the JIDP FEIS and authorized under the JIDP ROD which could benefit sage-grouse.

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52	Carmel Kail	SSS Greater Sage-Grouse	More intensive/extensive lit review on gsg is needed. Please conduct futher lit review to identify unmentioned recent gsg studies, the findings of which should have significant bearing on the JYRD Decision's treatment of sage grouse impacts. Specifically, discussion of current Noise Conditions (JYRD EA p. 59) should include information from Sound Levels at Greater Sage-grouse Leks, Pinedale Anticline Project Area, Wyoming, April 2013-2015, which observed (on page 13 of it), that *"In the PAPA area, sound levels and grouse counts have been conducted at 19 leks. At 12 of these leks, the L50 sound level was >26 dBA, and 7 of these leks no longer have grouse present. At the remaining 7 leks, sound levels were <26 dBA, and all of these leks still have grouse. Interestingly, 26 dBA is 10 dBA over the ambient of 16 dBA reported by Ambrose et al. (2014)."* Document available online, linked at http://www.wy.blm.gov/jio-papo/papo/. Also, unmentioned local and statewide WG&FD and Sage Grouse Working Group(s) reports, data and recommendations comprise critical and relevant context for gsg considerations in the JYRD EA and thus should be addressed by the extended lit review. Please include a brief review of their most recent reports and recommendations regarding monitoring protocols, tolerance of noise levels, winter concentration area significance and buffers, etc., such as linked at https://wgfd.wyo.gov/Habitat/Sage-Grouse-Management	Recent greater sage-grouse studies are addressed in the Approved RMP Amendment (September 2015). Noise monitoring was conducted by Behrens and Associates (December 2015) at the Sand Draw Reservoir and South Rocks leks. The BLM believes 30 dBA for ambient is a conservative value based on the recent monitoring. The document referred to (Ambrose et al., 2014) has not been peer reviwed, the Sage Grouse Implementation Team has not provided recommendations, nor has the BLM provided recommendations in GHMA with the exception of having the noise be 10 dBA above ambient.
53	Carmel Kail	SSS Greater Sage-Grouse	Augment and strengthen the BLM Mitigation Alternative. Please discuss, address, and require much more JYRD project-specific grouse winter concentration mapping/monitoring efforts. More information on wintering grouse is badly needed, and this project provides the logical opportunity to identify grouse now wintering at varying distances from the project and document their response to the proposed wintertime noise disturbance (to inform future projects and hopefully benefit grouse elsewhere in the future). Also please brainstorm, discuss and apply at least some experimental on-site wildlife impact mitigation options, including for grouse wintering (e.g., restrict construction and fracking/completion ops to non-sensitive months). Discussion of such potential mitigation measures would expand and significantly benefit the BLM Mitigation Alternative. Also, please analyze and consider requiring a water and condensate "Liquid Gathering System" (LGS) to reduce traffic impacts to air, antelope, grouse and other resources.	The YRD Project Area does not coincide with officially-designated Winter Concentration Area. BLM acknowldedges there are areas adjacent to the YRD Project Area that contain wintering grouse but the areas have not been officially designated as Winter Concentration Area. For the majority of the YRD Pads, liquids would be collected at centralized facilities and not at the well pad.
54	Carmel Kail	SSS Greater Sage-Grouse	Permitting noise levels to rise to 40 dba is too much. In fact, literature review suggests it would be a death sentence. Rather, analyze in the BLM Mitigation Alternative and require that cumulative gas extraction project noise at all given measuring spots / lek edges to be 35 dba or less at the time of JYRD project commencement, and decrease to 26 dBa during the (3-5 yr) life of the JYRD project. In support of this analysis, please identify and explore in the EA potential noise abatement / mitigation measures -- e.g., existing or planned equipment conversion to solar or other silent power, existing and planned traffic modification (horses, golf carts, carpooling), use of pipelines rather than haul trucks, more consolidation of existing facilities to reduce noise volume and/or re-locate noise sources to less sensitive locations, old-fashioned mufflers, and plywood sound barriers should be considered.	At this point, BLM is not certain that 40 dBA at the lek perimeter would adversely impact sage-grouse lek attendance; however, because the YRD Project Area is located within General Habitat Management Area and not Priority Habitat Managment Area, BLM determined that 30 dBA should be used as the baseline noise level - taken from 7-Day Average of measurements conducted by Behrens and Associates, Inc. in December 2015.

Comment No.	Commenter	Subject	Comment	Response
55	Carmel Kail	Air Quality	Near-Field Air monitoring data from the nearest data sources should be used in the EA. While the Juel Spring monitor is the nearest 'official' EPA monitor, data from Jonah, Sand Draw and other locations has been collected and should be used because it is more pertinent than Juel (which was selected specifically to NOT capture emissions present in the Jonah). Criteria pollutant background data presented in the EA appears to be derived from Juel and should be revised to reflect more pertinent / likely ambient conditions.	The Juel Spring monitoring site is considered as an appropriate background data site for the Jonah YRD Project as determined by the Wyoming Department of Environmental Quality – Air Quality Division. Data at the Juel Spring site is collected continously, year-round. Background pollutant concentrations are used as an indicator of existing conditions in the region, and are assumed to include emissions from industrial emission sources in operation and from mobile, urban, biogenic, other non-industrial emission sources, and transport into the region. Given that the Juel Spring monitor is located approximately 15 miles southeast of Jonah Field, field-wide emissions from Jonah Field are included in the monitoring data. Background concentration data are added to maximum impacts estimated from air quality modeling analyses to estimate the maximum pollutant concentrations that would be expected to occur. Monitoring data located adjacent to an emissions source are not appropriate background data for air quality modeling analyses given that the impacts from the source are included in the concentration data and adding modeled impacts to these data would provide an unrealtistic overestimate of expected pollutant impacts.
56	Carmel Kail	Air Quality	Consider/account for background formaldehyde/HAP pollution. Maximum predicted HAP impacts from the proposed Year-Round Jonah Drilling were modeled, and the results shown on tables on p. 43 (Acute/ 1 hr and Long-Term / Annual). However, (unlike tables regarding criteria pollutants on page 42), direct modeled project pollution vs. existing / assumed background pollution are not differentiated/specified -- so I conclude that background HAPs were ignored in this analysis. Yet, background HAPs SHOULD be accounted for. As an info source, see data at http://deq.wyoming.gov/aqd/winter-ozone/resources/winter-ozone-study/ For example, page 4-38 of the 2014 UGWOS report indicates that in 2014 the Jonah (likely the closest to the current proposal) monitor averaged just over 1.5 ug/m3, while the accompanying zipfile data shows the 2014 Jonah maximum (short term) formaldehyde sample reading at 5.45 ugm3. Adding these documented amounts of background pollution appreciably changes the total predicted ambient levels, and so I strongly suggest it be disclosed.	Representative background data for HAPs are not available for this project. If representative data were available, the concentration data would be added to modeling impacts. As mentioned in the above comment response, background pollutant concentrations are used as an indicator of existing conditions in the region, and are assumed to include emissions from industrial emission sources in operation and from mobile, urban, biogenic, other non-industrial emission sources, and transport into the region. The data collected during the UGWOS program are short-term (3-hour) samples collected for a limited number of days (6) during the winter months (January - March). These data are not representative background data given that they were not collected continuously over a long duration (at least 1 year). The purpose of the UGWOS program was to collect necessary data to help determine the causes of winter ozone formation in the Upper Green Basin. As part of the program, a large number of volatile organic compounds (VOCs) were measured in order to better understand the chemical mechanisms that result in winter ozone formation.
57	Carmel Kail	Air Quality	Maximum annual/long-term modeling should include all maximum activities anticipated in an annum (or five years). As I understand it, the maximum long term annual HAP modeling results (Table 3.1-15) includes only production (not drilling or completion activities). Since the proposed action is to allow continuous drilling with several rigs and also allow frack/completion work at any given time for the next five years (or at least three years), the Maximum Long Term (annual) figures logically should include everything which is foreseeable (or allowable) within one year (or five years) -- production, drilling, completion, truck traffic, construction etc.).	The maximum long-term (annual) HAP impacts would occur from production operations operating continously 24-hours per day, 365 days per year. The modeling analysis performed for the EA assumes four, 16-well pads operating continously for 365 days per year at maximum production levels. This analysis provides a conservative (high estimate) of the long-term HAP impacts from the proposed project.