Phoonswadi-Brewer, Sean

From: NPL_AR
Subject: Normally Pressured Lance Natural Gas Field EIS comments

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"Andrew J Blair"
<ablair344@bresna
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05/06/2011 11:16
AM

To
NPL_EIS_WY@blm.gov
cc
Subject
re: Normally Pressured Lance
Natural Gas Field EIS comments

Kellie Roadifer
Pinedale Field Office
1625 W. Pine Street
P.O. Box 768
Pinedale, WY 82941.

Dear Kellie,

I am writing you today on the proposal by Encana to develop 140,000 acres by drilling 3,500 wells in the initial phase of drilling operations in what I understand to be called the "Normally Pressured Lance Natural Gas Field" which directly abuts the Jonah Natural Gas Field.

I am concerned about this project for a number of reasons:

1) since the development of the Pinedale Anticline and the Jonah Field we have seen a decrease in the wintering mule deer population on the Mesa on the order of 60%. From a review of the literature, it is my understanding that these mule deer have not shown up in any of the surrounding herds and are presumed to have died. This decrease has occurred despite the best efforts of the gas companies to mitigate their impacts on wintering wildlife. At this point it is my understanding that efforts at mitigation have been largely ineffective. I would expect that adding another gas field to the Upper Green River Valley would only increase pressure on wintering wildlife that would result in further declines in population.

2) NOX and SOX are common emissions from gas field operations. Both NOX and

SOX, as I understand it, are associated with increased acidification of precipitation. It is also my understanding that the impacts of such precipitation are highest in areas closer to

the numerous point sources, such as the alpine lakes and streams of the Wind River Range, much of which is protected as Wilderness. I have read previous reports on the level of acidification in Wind River lakes and have noted that many of the lakes are

listed as "sensitive" or "very sensitive". I know that this issue has been raised in previous objections to large scale gas projects in the Upper Green.
I can only surmise that an additional gas field would put further pressure on these lakes and the local alpine ecosystem.

3) I believe that the Wilderness areas of the Wind River Range are designated as a class I view-shed. My understanding is that denigration of this view-shed is prohibited. I believe that studies have been done indicating that the current level of gas development in the Upper Green is already impacting the view-sheds in the Wind River Range. Speaking personally, I have watched this decrease in visibility take place over the last twenty years. When I drive from Lander to Pinedale, I am often met by a brown cloud of airborne particulate when I cross over South Pass. I would expect that adding another gas field to the Upper Green would likely further impact the class I view-shed of the Wind River Range.

4) This past winter brought several ozone warnings and ozone exceedences to

the Upper Green River Valley. These exceedences took place despite the best

efforts of the gas companies to reduce drill rig emissions and to reduce truck traffic to the fields as a response to previous exceedences. It is my understanding the EPA is expected to reduce the allowable level of ozone emissions further within the coming year. All things being equal (i.e. no big solutions to current levels of emission being on the horizon), I would expect the number of exceedences to increase with a lowering of the level of permissible ozone emissions even at the current level of development. I would expect ozone exceedences to become that much more frequent if an additional

field is added into the mix. Governor Mead has voiced concern about ozone warnings in the Upper Green recommending that the young and old stay in-doors and that all people refrain from aerobic exercise. Aside from the health impacts to the people living in this area, there is also the spectre of environmental conditions coming together in just the right way for these exceedences to reach the level of a violation of the Clean Air Act. It is my understanding that if this were to take place this would negitively impact the level of gas production allowable in the Upper Green River Valley.

5) It is my understanding that the BLM as mandated by FLPMA is required to administer the lands under its supervision for multiple use. Looking at a map of the Upper Green River Valley, with all its gas fields abutting each other, it is difficult to see the balance between gas field development and other uses.

When I review all of these concerns, I am left wondering how the BLM will be able to authorize this additional gas field in the Upper Green River Valley.
My recommendation would be to pursue a "No action" alternative with respect to this project. It is my understanding that a lot of gas is still coming out of Jonah and the Pinedale Anticline. The gas in this proposed field is not going anywhere. A "No action" alternative would allow Pinedale BLM to help the gas companies pursue a staged development approach to gas development in the Upper Green.

Thank you for your time.

Sincerely,

Andrew Blair
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