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1116

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Kellie Roadifer
Bureau of Land Management
P.O. Box 768
Pinedale, WY 82941



Re: Encana Normally Pressurized Lance Project

Dear Ms. Roadifer:

I am submitting my comment both as the Founder and Director of the Bridger Wilderness Institute, L3C (BWI) and as a citizen of Sublette County.

At this point, I'd simply like to make two suggestions:

First, please include Highway bridges and underpasses for use as wildlife crossings, most likely with the Jonah and Anticline Operators as funding partners as they are also responsible for much traffic, to mitigate the carnage and interference with wildlife along Highway 191 and possibly 189. This measure has been used with great success in other parts of the state and given the decimation of the Mule Deer in the area, is absolutely necessary. In addition to the obstruction of wildlife activity, winter grounds and migration, there is a huge toll in roadkill. In fact, on one trip north, I counted no less than six carcasses in a roughly one mile stretch between Farson and Luman Road. Livestock growers would probably appreciate them as well. Add in the risk to humans and their vehicles and I believe this is a no-brainer.

Second, please include in your consideration the FACT that in regards to air quality and also the ozone problem, the DEQ and ALL the operators in the area represented to the public in their recent public meeting that they DON'T KNOW WHERE THE FUGITIVE EMISSIONS ARE COMING FROM! Given that modeling has proven unsuccessful, as the Forest Service has stated in recent NEPA proceedings, you should take a much harder look at air quality issues in your EIS.

Indeed, prior BLM NEPA documents have proven to be patently false in regard to air quality issues.

In one iteration of the PAPA SEIS the BLM made the following representation regarding air quality: "[i]t is expected that there would be no violations to applicable federal and state air

quality standards.”¹ The BLM’s expectation was largely based on modeling and should there be problems, mitigation. It is well worth noting that the Ozone readings on March 2 came not only during an ozone advisory issued by DEQ but also as the Operators were implementing mitigation measures to prevent NAAQS exceedances. It is significant that the recent readings, which place the area in non-attainment status, were not only NOT predicted by the BLM’s modeling as reflected in its various SEIS drafts and ROD, but they were also NOT prevented by Operator-implemented mitigation measures even though these Ozone events were successfully forecasted by the DEQ. Indeed, in this Eagle Prospect DEIS the Forest Service stated “a reliable wintertime O3 model is not currently available.”² On March 12, 2009 Governor Freudenthal requested that all of Sublette County (in which the Eagle Prospect is located) be designated in non-attainment for 8 hour Ozone, which you note in the DEIS.³ EPA Region 8 Administrator Robert Roberts wrote to BLM Wyoming State Director Robert Bennett and rated the PAPA RDSEIS at “Environmentally Unsatisfactory – Inadequate Information” and requested revision and another public comment period.⁴ *It should be noted that the EPA’s rating came at the end of a three and a half year NEPA process!*

So my point is that it has become clear that there is a disparity between the projections of prior NEPA analyses in the Upper Green River Basin and the realities of 2011.

In effect, there is a great cloud of uncertainty over the entire basin.

Sincerely,



Evangelos C. Germeles

¹ United States Dep’t of the Interior, Bureau of Land Management, Draft Supplemental Environmental Impact Statement Pinedale Anticline Oil and Gas Exploration and Development Project, Executive Summary, at vi (December 2006).

² United States Dep’t of Agriculture, Forest Service, *DEIS Eagle Prospect and Noble Basin Master Development Plan Project*, at 4-18 (January 25, 2011) at 4-18.

³ United States Dep’t of Agriculture, Forest Service, *ROD Oil and Gas Leasing in the Wyoming Range*, at 7 (January 25, 2011).

⁴ Joy Ufford, BLM Flunks Its EPA Review, *Sublette Examiner*, February 8, 2008.