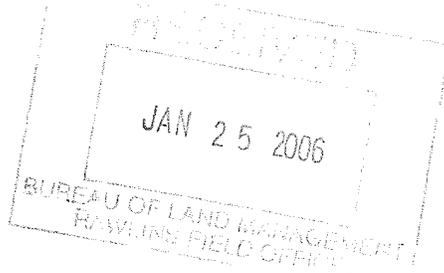


250

2443 Overland Road
Laramie WY 82070-4854

Mr. David Simons, Project Lead
Bureau of Land Management
U.S. Department of the Interior
Rawlins Field Office
P. O. Box 2407
Rawlins WY 82301



Re: Comments on *Atlantic Rim DEIS*

Dear Mr. Simons:

I take this opportunity to express my views on the *Draft [Environmental] Impact Statement for the Atlantic Rim Natural Gas Field Development Project Carbon County, Wyoming*, released by the Rawlins Field Office of the U.S. Bureau of Land Management in December, 2005. Following standard BLM protocol, I will refer to the draft document hereinafter as the DEIS.

In introduction, I am a retired vertebrate paleontologist and geologist, having served since the mid 1970s on the faculties of the Departments of Geology/Geophysics and Zoology/Physiology at The University of Wyoming. My comments are intended to represent only my own views; they do not necessarily represent the viewpoints of the university's staff, faculty, or academic leadership. I am, however, an official holder of a BLM-authorized Paleontological Resources Use Permit (for the State of Wyoming). I continue to be involved with geological and paleontological research in the vicinity of the Atlantic Rim, and the resulting specimens are being curated into the Collection of Fossil Vertebrates as administered within the Departmental Scientific Collections of UW's Department of Geology and Geophysics. I have submitted annual reports to BLM on this permit and its various predecessors for as long as I can remember. Each of the reports has included substantive information (composed specifically for BLM's use in paleontological protection) about the discovery of new localities in addition to summaries of the scientific importance of the year's work and references to resulting publications and reports. So far as I have been able to tell from closely reading the text of this DEIS, BLM has made no use of that carefully prepared information.

I have taken pains today to go through the entire DEIS in search of statements relevant to paleontological resources, and in this letter I will limit my comments to that specific subject. Information consequentially pertaining to paleontology exists only in the Executive Summary, Chapters 2-4 and 5, and Appendices A and H.

"Section 1.2.1 Geology / Minerals / Paleontology" of the "Executive Summary" (page S-4) states only: "No significant effects are anticipated for these resources under any of the action alternatives"

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MR. DAVID SIMONS

January 19,2006

Page 2

Paleontological resources were not identified as an "issue or concern" in "Chapter 1: Purpose and Need."

In "Chapter 2: Proposed Action and Alternatives," paleontological resources were identified as "Not significant" in each of the proposed alternatives.

250-1-1 | 250-1 | "Chapter 3: Affected Environment" provides simple mention of the existence of plant, invertebrate, and vertebrate fossils (relevant parts of Table 3-2 show ratings of "BLM Paleontologic Conditions 2 and 3" and no ratings for "Probable Fossil Yield Classes") for the various rock units that exist within or nearby the limits of the DEIS. Page 3-13 contains the following quotation: "With the exception of the Holocene deposits that are probably too young to contain fossils, all sedimentary rock units exposed in the project area are known to produce or have the potential to produce scientifically significant, vertebrate fossil resources." I am in professional agreement with that statement. It is unclear to me, however, how that assessment could have been translated in Chapter 2 as paleontological resources being "Not significant." I will add to the strength of the quotation on page 3-13 by stating that some of the world's most important localities that bear fossil mammals from the earlier half of Paleocene time are located within the confines of the DEIS and certainly are contained within areas that could be endangered by the project's development of new roads, pipelines, and well pads. As an example, these unique fossiliferous sites include well-preserved mammals that lived very shortly following the end-Cretaceous catastrophe that greatly affected all life on Earth.

250-2 | 250-3 | The possibilities of development-related damage to known paleontological sites were acknowledged on pages 4-3, 4-4, and 4-6 of "Chapter 4: Analysis of Environmental Consequences." The following quotation exists on page 4-3: "The magnitude of impacts associated with the loss of fossil resources associated with the proposed action or its alternatives would be reduced by the implementation of paleontologic resource mitigation measures described in Appendix K and 4.1.5.3." Thorough search of Appendix K, however, reveals no mention of the protection of paleontological resources. "Section 4.1.5.3 Paleontology" states, in its entirety: "With implementation of mitigation measures identified in Appendix H, Required Best Management Practices for Paleontology, no additional mitigation measures are required." Appendix H states (on page H-2 in the section entitled "Paleontology Resources") that: "Each proposed facility located in areas with known and potential vertebrate paleontological resource significance (Class II Paleontology Condition 1 and 2 areas and Probable Fossil Yield Class 3, 4, and 5 areas) would be surveyed by BLM-approved paleontologist prior to surface disturbance (USDI-BLM 1987b; 1990) 2) If paleontological resources are discovered at any time during construction, all construction activities would halt and BLM personnel would be immediately notified. Work would not proceed until paleontological materials are properly evaluated by a qualified paleontologist." If true, the final two sentences of the preceding quotation would seem reassuring in terms of protection of paleontological resources. Much more negatively, however, is the observation from Table 3-2 that (using the BLM's own jargon), none of the known paleontological sites within the limits of the DEIS qualifies as "BLM Paleontologic Condition 1," and the DEIS itself made no ratings for the "Probable Fossil Yield Classes" characteristic of the locally represented rock units. Those are the kinds of mechanical inconsistencies within the DEIS that cause me great professional concern. Of still greater concern to me are the perhaps

250-4 | unanswerable questions I hold about who applied this pair of classification schemes to the immediate area covered by the DEIS — and upon what scientific criteria were they applied? Finally, it is exceedingly difficult for any interested outsider to review this information because, at least as far as I was able to discern, the above-referenced evaluative criteria (i.e., "Paleontology Condition" and "Probable Fossil Yield Class") were neither defined in the DEIS nor referenced to access via another source. If I missed a stated lead, I would appreciate the correction by way of a reply to my letter. And I must also admit that I have little idea about how a "Class II Paleontology Condition" might differ from a severely desiccated grapefruit.

250-1-2 | 250-1 | 250-5 | "Chapter 5: Cumulative Impact Analysis" (page 5-4) provides an essentially correct general statement of the potential for cumulative loss of paleontological resources by way of the proposed development. In reference to acknowledgment of the existence of unique paleontological resources within the limits of the DEIS, one sentence states: "Loss of resources from such localities could be very significant." Again, I'm not at all sure how that viewpoint can be reconciled with what was stated in Chapter 2, wherein paleontological resources were identified as "Not significant" in each of the proposed alternatives. Chapter 5's relevant section closes (page 5-5) with the following quotation: "Cumulative beneficial consequences, including the recovery of scientifically significant fossil resources at known and as yet undiscovered fossil localities could occur anywhere in the project area. To be most beneficial, a mitigation plan for recovery and curation of newly discovered specimens and recording associated geologic data should be adopted." I agree wholly with that statement. The DEIS itself, however, does not present a workable, realistic plan for that form of mitigation.

250-6 | In "Appendix A — Interim Drilling Policy" (page A-2) is stated: "Some sensitive resources such as high density paleontological or cultural resources sites, are not mapped and will also be handled on a pod basis." In this regard, I have grave doubts that BLM personnel will be aware of where the individual sites actually are. Also stated in Appendix A (page A-4) is the following: "Field inspections by the BLM will be conducted to verify presence of these resource values and potential impacts prior to considering authorization of any proposed development activity on Federal surface and/or minerals." So far as I am aware, none of the various Wyoming offices of BLM has a research-experienced vertebrate paleontologist on its staff. If my perceptions are true, why should one anticipate that the proposed site inspections would be qualified as adequate? If my perception is wrong, please accept my apology.

Because of geographical and professional circumstances, it is probably true that I would be about as well qualified to review the paleontologically relevant sections of this particular DEIS as anyone in the world. I approached this job with an open mind and with high hopes for seeing a quality product — because I am sincerely interested in protecting the unique paleontological resources that are sprinkled across the relevant landscape. I was, however, greatly disappointed in almost all aspects of what I have read. It is my opinion that protection of the paleontological resources in this part of Wyoming will *not* be adequately enhanced by the procedures and methodology presented in this DEIS.

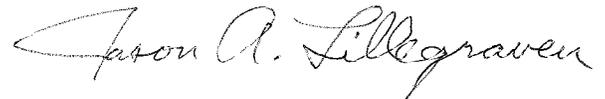
MR. DAVID SIMONS

January 19, 2006

Page 4

I look forward to reading the final version of the *Environmental Impact Statement for the Atlantic Rim Natural Gas Field Development Project*.

Sincerely yours,

A handwritten signature in cursive script that reads "Jason A. Lillegraven". The signature is written in black ink and is positioned to the right of the typed name.

Jason A. Lillegraven
Arts and Sciences Distinguished
Emeritus Professor

JAL:me



United States Department of the Interior

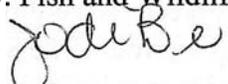
FISH AND WILDLIFE SERVICE

**Ecological Services
4000 Airport Parkway
Cheyenne, Wyoming 82001**

**In Reply Refer To:
ES-61411/W.02/WY10031**

Memorandum

To: Mark Storzer, Field Manager, Bureau of Land Management, Rawlins Field Office, Rawlins, Wyoming

From:  Brian T. Kelly, Field Supervisor, U.S. Fish and Wildlife Service, Wyoming Field Office, Cheyenne, Wyoming 

Subject: Atlantic Rim Natural Gas Project Draft Environmental Impact Statement

JAN 26 2006

FM	_____	RA	_____
AFM-SC	_____	EPS	_____
AFM-RES	_____	P&EC	_____
AFM-M&L	_____	LEO	_____

JAN 30 2006

PAO

This is regarding the December 2005 Draft Environmental Impact Statement (DEIS), for the proposed Atlantic Rim Natural Gas Project located in T13-20N, R89-92W, in Carbon County, Wyoming. Anadarko Petroleum Corporation (proponent) proposes to drill 1800 coal bed natural gas wells and 200 deep conventional wells on 270,080 acres of combined federal, state and private lands. The wells are proposed at 80-acre spacing and will be developed over a 20-year period with an estimated life of project of 30 to 50 years. The U.S. Fish and Wildlife Service (Service) has reviewed the DEIS and we are providing you with the following comments.

General Comments

The Service has responsibility, under a number of federal laws, treaties, Executive Orders, and memoranda of agreement, for the conservation and management of fish and wildlife resources. Some of these same authorities also require other federal agencies to consider, avoid, or prevent adverse impacts to fish, wildlife, and wetland resources. We provide comments on (1) threatened, endangered and candidate species, (2) migratory birds, (3) wetlands and riparian areas, and (4) sensitive species. The Service provides recommendations for protective measures for threatened and endangered species in accordance with the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.). Protective measures for migratory birds are provided in accordance with the Migratory Bird Treaty Act (MBTA), 16 U.S.C. 703 and the Bald and Golden Eagle Protection Act (BGEPA), 16 U.S.C. 668. Wetlands are afforded protection under Executive Orders 11990 (wetland protection) and 11988 (floodplain management), as well as section 404 of the Clean Water Act. Other fish and wildlife resources are considered under the Fish and Wildlife Coordination Act, 48 Stat. 401, as amended, 16 U.S.C. 661 et seq, and the Fish and Wildlife Act of 1956, as amended, 70 Stat. 1119, 16 U.S.C. 742a-742j.

The DEIS states that drilling is proposed on nine Plan of Development (POD) areas. However, six of the PODs are currently partially developed under an Interim Drilling Policy established by the Bureau of Land Management (Bureau) in January 2002. The Interim Drilling Policy allowed up to 200 exploration coal bed natural gas wells within the project area while the Environmental Impact Statement was being prepared. National Environmental Policy Act (NEPA) analysis of this interim development was documented in an individual Environmental Assessment (EA) for each POD.

384-1-1
384-1

The Service previously reviewed the six individual EAs and provided comments to the Bureau expressing our concern that the cumulative effects of full field development would not be adequately analyzed with individual EAs. We recommended that the Bureau complete the EIS before any drilling was permitted to ensure that decisions made by the Bureau considered the consequences of the full field development; however, to date, 116 wells have been drilled under the Interim Drilling Policy.

384-2-1
384-2

During our review, the DEIS indicates that the project area's vegetation composition consists of nearly 95 percent sagebrush species. It also states that the project may have significant effects on sagebrush obligates such as greater sage-grouse, pygmy rabbit, Baird's sparrow, sage thrasher, Brewer's sparrow, and sage sparrow. The Service is concerned that the effects to habitats important to the above species may be irreversible and no amount of mitigation can restore or replace what is lost. As several of these species are known to be in decline from loss of habitat, the Service recommends that the Bureau not authorize an action that may exacerbate their decline and possibly result in listing of one or more of these species under the Act.

Specific Comments

384-3-1

384-3

384-3-2

1. Page 2-1, section 2.2.1, The Proposed Action, Bullets 5 & 6: The DEIS states that initial (short-term) disturbance will total approximately 15,800 but with reclamation the disturbance may be reduced by 9,500 acres for a total long term disturbance of 6,241 acres. *The Service is concerned that the long term disturbance figures may not reflect on-the-ground difficulties with reclamation as are discussed on page 3-48 of the DEIS (current POD conditions). The DEIS states that several of the PODs where drilling has taken place are experiencing hampered reclamation due to poor soils and poor vegetation, ineffective seeding due to wind erosion and lack of moisture, riling and gullyng, excessive erosion due to inadequate road design, and well pads developed too close to drainages. Additionally, Appendix M (map 13) indicates that the soils within the project area have high run off potential which may further hinder reclamation. The Service recommends that the Bureau consider phasing in the completion of each POD based on the reclamation success of the previous POD. The Bureau should also work closely with the project proponent during the siting of well pads, roads and other facilities to minimize erosion problems.*

384-4

2. Page 3-72, Greater Sage-grouse Page 4-65, Upland Game Birds: Page 3-72 of the DEIS states that there are 88 lek locations in and within two miles of the project area. It also states that 85 percent of the project area consists of Wyoming and mountain big sagebrush habitat which sage-grouse are dependant on year-round. The DEIS goes on to state that the Bureau protects sage-grouse by requiring a 0.25-mile controlled surface use

384-4-2
384-4-3
384-4-1

buffer around identified leks as well as a 2-mile seasonal buffer around leks to protect nesting habitat. Page 4-65 states that sage-grouse are abundant within the project area with approximately 92 percent of the area consisting of nesting habitat. *The Service is very concerned that authorization of this project, as proposed, will significantly affect the population of greater sage-grouse that occurs in this area of Wyoming. Adverse effects to sage-grouse may occur through the long-term loss of sagebrush habitat, fragmentation of habitat, and noise associated with project activities. The Service does not support a 0.25-mile protective buffer around sage-grouse leks as a mitigation measure, nor do we support a 2-mile buffer to protect nesting habitat. As you know, Lyon et al. (2003) found that disturbance can increase the distance from leks to nest sites and that the majority of hens from disturbed leks (as may be the case here), nested greater than 2-miles from the lek, while the majority of hens from undisturbed leks nested within 2-miles of the lek.*

384-4

Additionally, recent information from a doctoral dissertation on the impacts of oil and gas development to greater sage-grouse in the Pinedale Anticline found that as development increased, lek activity declined up to 100 percent (Holloran 2005). Negative impacts to active leks extended to a distance of 5 km from an active drilling rig. Similarly, juvenile male recruitment to impacted leks also fell. Nesting females also avoided areas with high well densities, although site fidelity to previous nesting locations may result in delayed population response to the habitat changes associated with development. While some birds were displaced by the disturbance, Holloran (2005) also found that many sage-grouse discontinued breeding attempts, and others died at a higher rate than birds from unaffected areas. His conclusions suggest that natural gas field development contributes to local sage-grouse extirpations. Additionally, Holloran concluded that stipulations placed on oil and gas development in the Pinedale Anticline, which are identical to those proposed for the Atlantic Rim development, were insufficient to maintain sage-grouse breeding populations in natural gas fields.

384-4-4

The Service strongly recommends minimum protection measures as described by Connelly et al. (2000). The Service also encourages the Bureau to use its authority and not grant exceptions to protection measures for sage-grouse.

384-4-5

Finally, the Service would like to remind the Bureau of the 2001 Memorandum of Understanding (MOU) that the U.S. Forest Service, the Bureau, and the Service signed on with the Western Association of Fish and Wildlife Agencies to conserve the greater sage-grouse and its habitat. This MOU outlined the participation of Federal and State wildlife agencies, including the Wyoming Game and Fish Department, in greater sage-grouse conservation, and these commitments should be considered in project planning in sage-grouse habitat.

384-4-6

- 3. Page 3-83, Sensitive Wildlife Species, Page 4-61 and Page 4-68, General Wildlife Species, Page 4-73, Impacts Summary, Page 4-81, Sagebrush Obligate Songbirds, and Page 4-89, Sensitive Species: The pages of the DEIS listed above briefly discuss sagebrush obligate songbird species and state how impacts from this project would significantly affect nesting and foraging habitats exceeding the significance criteria as established in the Draft Resource Management Plan for the Rawlins Field Office. *The Service is concerned that the DEIS does not discuss the Bureau's obligation to protect*

384-5-1

384-5

384-5-2
384-5-1

384-5

migratory birds under the MBTA. Although the DEIS states that the effects exceed the established criteria threshold, it does not state what measures will be implemented to directly protect migratory birds, especially Brewer's sparrow, sage sparrow, sage thrasher and Baird's sparrow, all known to occur within the project area. To avoid further decline of sagebrush obligate songbirds we recommend that the Bureau identify habitats within the project area important to migratory birds and clearly identify measures that will be implemented to reduce the effects so that they fall below the Bureau's significant effects criteria.

384-6-1

384-6

4. Page 4-77, Proposed Action: The DEIS states that blowout penstemon and Ute ladies'-tresses would not be impacted by the project. However, the biological assessment (Appendix G) states that the project "may affect, but is not likely to adversely affect" both species. The Service recommends that the final EIS clarify whether these species may be affected by the project. In the event that listed species may be affected, the Bureau should initiate section 7 consultation under the Act and request Service concurrence their determinations.

384-7

5. ~~Page 5-16, Greater Sage-grouse and Columbian Sharp-tailed Grouse:~~ The DEIS's cumulative effects analysis for the greater sage-grouse states that direct and indirect impacts from habitat fragmentation, dust, noise and long term loss of sagebrush habitat would be cumulatively significant leading to long-term decline in the population of sage-grouse. Please see comment #2 above. The Service reminds the Bureau of their commitment to conserve the greater sage-grouse and its habitat.

We encourage the Bureau to ensure the conservation of endangered, threatened, and candidate species, migratory birds and sensitive species. If you have further questions regarding our comments or your responsibilities under the Act, please contact Kathleen Erwin of my staff at the letterhead address or phone (307)772-2374, extension 28.

References

Connelly J.W., M.A. Schroeder, A.R. Sands, and C.E. Braun. 2000. Guidelines to manage sage grouse populations and their habitats. Wildlife Society Bulletin 28(4): 967 - 985.

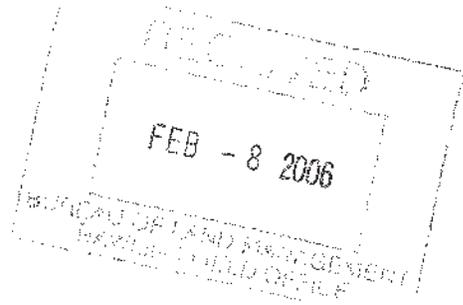
Holloran M.J. 2005. Greater sage-grouse (*Centrocercus urophasianus*) population response to natural gas field development in western Wyoming. Ph.D. Dissertation, University of Wyoming, Laramie, WY. 115 pp., plus appendices.

Lyon A.G., S.H. Anderson. 2003. Potential gas development impacts on sage grouse nest initiation and movement. Wildlife Society Bulletin 31(2): 486-491.

cc: BLM, State Office, State Director, Cheyenne (B. Bennett)
FWS, Regional Office R6, Energy Coordinator, Lakewood, Colorado (B. Dach)
WGFD, Statewide Habitat Protection Coordinator, Cheyenne (V. Stelter)
WGFD, Non-Game Coordinator, Lander (B. Oakleaf)

Baggs, Wyoming 82321
February 6, 2006

Bureau of Land Management
Rawlins Field Office
P.O. Box 2407
Rawlins, Wyoming 82301



Comment for the DEIS -Atlantic Rim Natural Gas Project:

Since Weber Ranch has private acres as well as its BLM grazing permit (Doty Mountain allotment) in the Atlantic Rim Natural Gas Project area, we are appreciative for the opportunity to comment on the Draft Environmental Impact Statement for the Atlantic Rim Natural Gas Project, Carbon County, Wyoming.

The mission of the BLM is to sustain the health, diversity, and production of the public lands for the use and enjoyment of present and future generations. With this statement in mind, we think the United States should develop our own energy instead of depending on petroleum from countries that have unstable governments who want to annihilate us.

We think that Anadarko, Double Eagle, and the other gas extracting companies involved in the project are very knowledgeable and competent in their field and we trust their expertise. We realize that it must not be feasible for Anadarko to drill one well per 160 acres (which would result in less disturbance for our grazing operation and which we initially preferred). Anadarko would not be spending twice as much money drilling twice as many wells, etc., if the 1 well per 80 acres spacing wasn't necessary to recover the coalbed methane gas.

We think the reclamation of the disturbed land is very important. There has been a lot done toward that end in the last year with the wells drilled on our land. We are confident the land will be reclaimed. Control of invasive weeds is a concern of ours.

We could adjust our livestock grazing operation to the gas development if it is spread out over the whole project area easier than if everything on the Doty Mountain Allotment is developed at once.

Sincerely,

Ray Weber
Kathleen Weber
Weber Ranch Co.

388-2 | 388-1

393

January 24, 2006

Rawlins Field Office
Bureau of Land Management
1300 North Third
PO Box 2407
Rawlins, WY 82301

Dear Rawlins Field Office,

For decades, the United States of America has relied on natural resource extractors to gather and supply the people's tremendous demands for heat, power, electricity, transportation, and a wealth of other needs. This has been met by companies like Anadarko, and continues to be met as the demand grows. Anadarko is by far the finest company in this nation of ours when it comes to careful, environmentally friendly resource extraction. The work they are conducting in Wyoming right now is a testament to this. For example, on the Atlantic Rim proposal, Anadarko offered to fund the mule deer migration study in its entirety.

What I am trying to say here is that natural resources like natural gas and oil are tremendously vital to the survival of our country. Drilling in the Atlantic Rim field is an incredible opportunity to meet the demands of our nation's growth and corresponding energy needs. In addition, Anadarko most qualified, safest and environmentally conscious company anyone could ask for to do so. Clearly it is a win-win situation that deserves fair treatment of Anadarko, and the methods of development it needs to use in order to successfully develop the field.

Unfortunately, fairness is lacking in several areas in this EIS. These areas include seasonal restrictions, surface disturbance guidelines and numerous water well issues. Most importantly wrong with this EIS is the seasonal restriction portion. By creating only a 135 day window for activity in an area, BLM will essentially be creating a transient workforce through the implementation of this guideline. This type of employment pattern will be detrimental to what would have otherwise been an economic stimuli for Wyoming with the employment opportunities the Atlantic Rim will create. Secondly, these restrictions will severely reduce the production output needed to be profitable for Anadarko. Given Anadarko's contributions through mitigation to this project and many other projects in this state, I would call this very, very unfair.

It is of the utmost importance that the BLM reverse and loosen the seasonal restriction and surface disturbance portions of the Atlantic Rim EIS. Think of the implications to our state and national economies and well-being if you do not. Thank you for your time.

Sincerely,

Douglas Arcand



393-1-1

393-1

396

January 25, 2006

To Whom It May Concern:

I am an employee in the oil and gas industry.

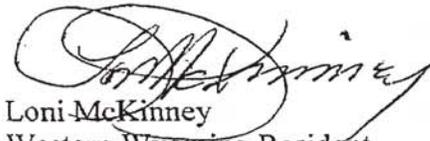
I am requesting the BLM reconsider the spacing requirements with the following issues being considered in the analysis:

396-1-4 396-1-3 396-1-2 396-1-1

- Anadarko's findings during the 4 years of research in the Atlantic Rim area.
- Gas recovery between 80 and 160 acre spacing, specifically how much of the 1.5 trillion cubic feet of gas will not be recovered at 160 spacing.
- A review of the economic cost to local communities (Sweetwater and Carbon Counties), Wyoming, the Federal Government, and the American consumer by not recovering the gas at 160 acre spacing.
- The BLM's preferred alternative's consistency with the new Energy Bill and the President's Energy Policy.

I appreciate the opportunity to comment. I look forward to the final Record of Decision.

Sincerely,



Loni McKinney
Western Wyoming Resident

397

January 25, 2006

To Whom It May Concern:

I would like to ask the Rawlins BLM staff to deny the preferred alternative in the draft EIS. I believe the BLM's call for 160 acre spacing will not allow Anadarko the opportunity to develop the Atlantic Rim Project properly and will leave a valuable resource in the ground.

397-1

This project is important to our local economy. Wyoming needs the jobs and the tax base that comes with it. Anadarko employees 200 people in Wyoming and they contact with other energy service providers who employee 100s of other Wyoming residents. I am concerned the 160 acre spacing requirement will halt the project and decrease economic activity in the area. The 80 acre spacing will increase employment and ancillary activities like lodging, meals and material procurement. All these activities add to the local payroll, local taxes and federal royalty payments. Has the BLM adequately reviewed these issues in the DEIS? Have you considered all the socioeconomic impacts?

397-2

The preferred alternative as proposed might result in 1 trillion cubic feet of gas not being developed or recovered. I feel this is clearly the wrong direction and opposite of the Presidents energy plan. I encourage the BLM to review the economic impacts of 160 acre spacing compared with the 80 acre spacing. I look forward to the outcome of the BLM's review.

Sincerely,

Harley McKinney
503 5th St. R.S. WY

Harley McKinney
Western Wyoming Resident

25 January 2006

Rawlins Field Office
1300 North Third
PO Box 2407
Rawlins, WY 82301

Dear Rawlins BLM:

Please don't tell me that you are **caving** to the interests of the environmental community. Proposing to adopt your "preferred" Alternatives B and C would be such a move. Please take a moment to consider the other side.

Anadarko is a company made up of consummate professionals whose work benefits the **entire** United States. Anadarko is also extremely sensitive to the environment, which is reflected **in** their project analyses. It is also reflected through gestures like funding the mule deer migration study. Nonetheless, my worry is that both Anadarko test results and **a significant amount of** data collected by BLM technical experts from the Resource Management Group in Casper have been ignored in the preferred alternatives of this DEIS.

Alternatives B and C will be an unfeasible financial and logistical burden on Anadarko. This is flat out wrong given the fact that Anadarko will bring with its drilling efforts 578 new local jobs and a tremendous amount in tax revenue through property taxes. So let's ask ourselves again, are Alternatives B and C fair? Absolutely not is our answer. Please support Anadarko's Preferred Alternative. Doing so is a thumbs up to Wyoming's economic well being and America's energy success.

Please let me extend my kind thanks to you for taking the time to read this.

Kind Regards,

Jason Dolce
Wyoming Citizen

399-1-2

399-1

407

January 25,2006

Rawlins Field Office
Attention Public Comments
P.O. Box 2407
Rawlins, WY 82301

To Whom It May Concern:

I would like to thank you for the opportunity to comment on the draft EIS regarding oil and gas drilling in the Atlantic Rim area of the Rawlins BLM Field Office.

I am opposed to the adoption of the Atlantic Rim DEIS preferred alternative because it restricts oil and gas drilling at a time when our nation needs more development. My comments are based specifically on the 160 acre spacing requirement when Anadarko's extensive field research shows 80 acre spacing is the appropriate spacing to fully develop the natural gas resource.

I would also like to comment on the socioeconomic side of the EIS. The BLM's preferred alternative will also have a negative impact on our local economy including job loses and reductions in tax income to schools and local government. Has the BLM researched the economic cost of 160 acres spacing compared to 80 acre spacing? What are the costs of the lost resource in royalty payments, severance tax and employment to our local areas if the field cant be produced?

Please support our local economy and withdraw the Atlantic Rim DEIS preferred alternative and take a closer look at Anadarko's preferred alternative.

Sincerely,



Corky Faler
Western Wyoming

407-1-2
407-1-3

407-1

WYOMING GAME AND FISH DEPARTMENT

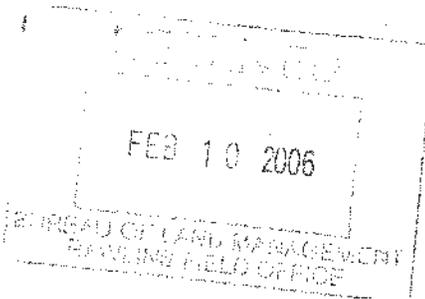


"Conserving Wildlife - Serving People"

February 8, 2006

WER 9678.00
Bureau of Land Management
Rawlins Field Office
Draft Environmental Impact Statement
Atlantic Rim Natural Gas Development Project
Carbon County

David Simons
Bureau of Land Management
Rawlins Field Office
P.O. Box 2407
Rawlins, WY 82301



Dear Mr. Simons:

The staff of the Wyoming Game and Fish Department and the Federal Register regarding the Notice of Draft Environmental Impact Statement for the Atlantic Rim Natural Gas Development Project. We offer the following comments.

Terrestrial Considerations:

General Comments:

We previously submitted comments in a letter dated October 28, 2005, during the preliminary draft stage of this project and those concerns remain valid.

The Project area lies within the Baggs pronghorn and mule deer herds, and the Sierra Madre elk herd.

There are 88 sage-grouse leks in and adjacent to the project area, and Columbian sharp-tailed grouse use areas along the east and southeast boundary.

This project will impact wildlife in several ways:

- Direct loss of habitat from construction and production activities,
- Increased human disturbance from development activities and increased access,
- Increased public access within the project area, and
- Cumulative impacts with other projects in the region.

413-1

413-1-1

We would like to see the project developed in such a way as to reduce impacts to the greatest extent possible. We believe this means mitigating loss of habitat as it occurs, and in cases where development has already occurred, there is backlog of mitigation to be done. We welcome opportunities to work with the operators on improving habitats within the project area and suggest you contact our local wildlife biologists, Tim Woolley (307 383-6082) in Savery, or Greg Hiatt (307 324-7927) in Sinclair, for additional information.

413-1-2

The document states that areas with silver sage and bitterbrush would have limited disturbance. We agree with this stated result since the Sand Hills have silver sage and bitterbrush, and is an important crucial winter and transition range for mule deer and elk. It is very important to protect this resource. However, we could not find where and how much was going to be protected.

413-1

We support the fewest numbers of wells as possible, and we would recommend that mitigation for wells drilled and consequent acres disturbed be addressed in the project. If the decision is made to permit more than four wells per section, the mitigation will need to be increased as well, and we would like to work with the companies to develop an effective mitigation plan for wildlife. Such items as reduced standards for roads, closing roads after they are built, and remote well monitoring would be beneficial in reducing disturbance to big game and sage grouse. We believe that an active and effective approach to mitigation will reduce the overall impacts to wildlife. We will utilize our *Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats (December 6, 2004)* document for potential strategies for mitigation and avoidance of wildlife impacts, and we encourage the BLM to refer to it also.

413-1-3

413-1-4

413-1-5

The Wildlife Monitoring Plan, as designed, will not be effective at detecting changes to the various wildlife populations. Because mitigation is predicated on the monitoring plan, it is essential monitoring be done effectively. We recommend the BLM review and summarize their current wildlife monitoring data that have been collected to date in adjacent gas fields. This will demonstrate the impact to wildlife in these fields and what we may expect as a result of the current development proposal. At present, we do not know whether other wildlife monitoring and protection plans (e.g., Continental Divide/Wamsutter II) have been effective in determining and mitigating effects in the last five years.

Specific Comments:

413-2

Page 3-49 There are many descriptions of existing erosion and reclamation problems occurring on most PODs, as presented by the BLM. We recommend repairing these problems before additional sites are developed.

413-3

Page 3-70 In the big game table, mule deer Hunt Area 85 is listed. We removed Hunt Area 85 several years ago and incorporated it into Hunt Area 84.

413-4 | Page 3-73 It should be clarified that sage-grouse seasons were set at a later date to reduce the harvest of older, successful reproducing hens that were found with broods near water. The later season decreased the harvest of hens, since the birds were scattered in all habitats.

413-5 | Page 3-73 Under the section about sage-grouse severe winter relief, it would be helpful to include the report on sage-grouse severe winter relief by Hayden-Wing Associates. Is this report completed?

413-6 | Page 3-82 Under sensitive species, it is stated that no swift foxes were found near the project area. However, a swift fox was observed by a consultant southeast of Wamsutter during a ferret clearance survey about six to seven years ago. This was reported to us by the BLM. This makes it at least likely that swift fox may be present in the area.

413-7-1 | Page 4-47 We recommend the BLM develop an area-wide vegetation treatment plan if vegetation treatments are proposed. An estimated 16,000 acres of vegetation will be removed through construction activities. Vegetation management on the project area should be focused on weed control and reclamation, versus removal of shrubs, and on providing landscape-level vegetation needs for all native wildlife. If shrub control is used, we encourage mechanical treatments as the main treatment option for shrub control.

413-8-2 | 413-8-1 | 413-8 | Page 4-59 Under the "Impact Significance Criteria" section, some statements are made that if habitat function is lost, then substantial impacts will occur. Habitat function should be defined in the document. Also, mortality to T&E species is a criterion, but implementation of monitoring the mortality of T&E species needs to be addressed.

413-9 | Page 4-63 This statement suggests that winter ranges are being moderately used by big game. It needs to be explained how the level of use was determined.

413-10 | Page 4-64 While free movements are difficult, we disagree that pronghorn are trapped within the herd unit during hard winters. There is a section of lay down fence panel along Highway 789 at Peach Orchard Flat that can be used in severe winters.

413-11 | Page 4-63 We disagree that pronghorn and deer will habituate to predictable traffic. The project area has received a large amount of hunting pressure during pronghorn seasons in recent years, and because of this, pronghorn avoid any vehicle, and seem to remain wary most of the year. In addition, recent studies of mule deer suggest that avoidance is a more common response than habituation. If there are data that suggest these animals will acclimate, please reference these studies.

413-12 | Page 4-65 There may be higher rates of predation on sage-grouse due to increases in perches for eagles (e.g., buildings, panels at well sites).

413-13 | Page 4-66 Serviceberry stand areas are important winter habitats for sharp-tails and should be protected within the project area.

413-14

Page 4-67 Sage-grouse wintering areas should be mapped before too much development occurs.

413-15

Page 4-69 Not all animals may move onto adjacent habitats when development is clustered, but this development scenario is a good concept and would reduce the impacts of an "all at once" approach. We support some type of clustered development as opposed to having concurrent activities that are scattered throughout the impact area.

413-16-1

413-16-2

413-16

Page 5-11 In the cumulative impacts section, there are no data (i.e., amount of disturbance, miles of roads) to list the cumulative amount of disturbance, or maps illustrating the impacts. We recommend that the reader should determine the severity by looking at the data. The current approach does not adequately describe what is occurring on the ground. For example, there are no acreages listed for the prescribed burns in the area, although it is important since this adds to the amount of shrub habitat that may already be out of production. It also states that most of the shrubs are over-mature and need to be removed, however, there are no supporting data on amount of age classes and where they occur. This is very important information for not only explaining impacts, but for planning vegetation enhancements for mitigation.

413-17

Page 5-13 In the Range Resources section, the cumulative impact is said to result in a "small net loss to annual forage." Unless reclamation is correctly done, it could be a larger impact, especially if drought occurs in this 8-10 inch precipitation zone. What if the disturbed areas result in undesirable weeds like halogeton? With areas taken out of production, livestock will be crowded onto the remaining acres, resulting in increased grazing pressure.

413-18

Appendix B Reclamation of well sites suggests using vegetation species useful for wildlife and livestock. Protection of reclaimed areas until forage re-establishment should be addressed.

413-19

Appendix B It may be beneficial to state how vegetation and soil inventories will be done.

413-20

Appendix D Spotted and thirteen-lined ground squirrels have the same scientific names in this table. The spotted ground squirrel should be *S. pilosoma*, (from Chapman and Feldhamer, 1982), and is usually found in shortgrass prairie habitats in southeast Wyoming.

413-21

Appendix E We recommend monitoring sage-grouse and sharp-tail leks annually, using population estimation protocol for comparisons of disturbed versus undisturbed sites, (i.e., Wyoming Game and Fish sage-grouse count lek protocol to determine effects). We recommend data be collected on our sage-grouse lek forms to be included in our statewide database.

413-22

Appendix E What is going to be done with the raptor productivity data? It would be beneficial to compare developed areas to undeveloped areas to learn more about productivity on, and away, from project areas.

413-23

Appendix E We will periodically update big game winter ranges, which can change over time, especially after the habitat has been altered.

413-24

Appendix E, 2.3.1.4 It should be explained what plover habitat is practical to protect.

413-25

Appendix H If there is already a POD in a migration corridor, is there an adaptive management process to alter development to deal with it?

413-26

Appendix L In the sage-grouse section within alternative C, this section is confusing. Wildlife protection measures seem to only protect sage-grouse wintering areas. Is this in addition to 1/4-mile NSO' s for leks? The other protections are unclear.

413-27

Appendix M, Page M-34, Maps The SMA map key does not match the map fill (i.e., difficult to discern the different areas). Also on page M-38, please clarify the data source used for successful hunts.

Aquatic Considerations:

Issues of concern are impacts to water quality, impacts to surface hydrology, and impacts to soils especially in riparian areas. Increased disturbances from roads, pipelines and pad development can affect the water quality and also impact the hydrology of these drainages.

Our comments dated October 28, 2005 establish the importance of the aquatic resources within the Muddy Creek drainage and our desire to see maximum protections put in place to protect these resources.

We are opposed to Alternatives A and B. Furthermore, we are concerned that if the proposal is implemented as written, the vast areas of disturbance will negatively impact the aquatic resources in the area. Roads, pads, pipelines and other infrastructure will change natural overland flow processes, rates, and quantities. The resulting changes to hydrologic processes within the drainage will negatively alter natural instream processes, thereby altering the habitat necessary to support all life stages of the native aquatic communities within the Muddy Creek drainage.

We support alternative C, if in addition to implementing the stipulations and BMPs discussed in the document and in Appendix H, J, and L, adequate protective measures are implemented to further protect the aquatic resources in the project area.

At the present time, the precise reach of Muddy Creek located within the boundaries of the project area supports the only viable assemblage of bluehead suckers, roundtail chubs, and flannelmouth suckers known to still exist in Wyoming. Not only does this reach of stream provide the preferred habitat components selected by these native fishes to complete their life cycle, but also the mobility of this fish assemblage is restricted from movement either up or down stream of this reach due to combinations of physical and water temperature barriers. Therefore, any cumulative energy development activity that negatively affects the integrity of the watershed and overall stream system health may jeopardize the future existence of these native

413-28-1

413-28-2

413-28

413-28-3
413-28-4

fishes. For this reason, we recommend that specific stipulations be implemented to protect these species inside the project area between the Continental Divide north of Muddy Creek proper and the Muddy Creek/Dry Cow Creek hydrographic divide located south of Muddy Creek. At a minimum, no drilling or other field development activities should be allowed to occur within 1/4 mile of any active stream channel in the upper Muddy Creek watershed.

Outside the area defined above, no drilling activity or disturbance should be permitted within 500 feet of a riparian area, wetland or stream channel. We recommend applying a standard NSO stipulation to all riparian zones and a 500-foot corridor extending from the outermost limit of the riparian habitat (WGFD 2004).

We support the proposal put forth by the operator for no surface disposal of produced waters. If surface discharge is considered in the future, we have the following concerns:

- Increased salt loading within the Colorado River basin.
- The reach of Muddy Creek in the project area provides the preferred habitat components selected by these native fishes to complete their life cycle. Altering the chemistry, suspended solids, water temperature, and/or natural hydrograph of the watershed through the discharge of CBNG production water to drainages within the Muddy Creek drainage could result in the elimination of the native fish assemblage, even if the water meets the revised TDS loading set by the Colorado River Basin Salinity Control Forum in 2002.

413-28
413-28-5
413-28-6

We recommend minimizing road development and in particular new road crossings of Muddy Creek proper. In particular, we suggest a transportation plan be developed for this project, and that Department personnel are consulted to minimize impacts to fish and wildlife resources. If a new road must cross Muddy Creek anywhere in the drainage, a bridge or bottomless culvert of sufficient size to fully span the active channel, including the primary floodplain, should be used. New crossings should not impact the ability of fish to move upstream/downstream, nor change the stream hydraulics up to a normal high flow event. Under no circumstances should round, corrugated culverts be placed in stream channels.

413-28-7

If reserve pits are used, we recommend designing drill pad sites to drain excess storm water and other fluids into a properly sized reserve pit. The pit should have adequate capacity to intercept and hold excess precipitation. We recommend lining all reserve pits, irrespective of soil types, with a suitable, impermeable barrier to eliminate possible contamination of soil and groundwater (WGFD 2004).

413-28-8

Staging, refueling, and storage areas should not be located in riparian zones or on flood plains. Keep all chemicals, solvents and fuels at least 500 feet away from streams and riparian areas (WGFD 2004).

413-28-9

Stripping riparian canopy or stream bank vegetation should be avoided whenever possible. It is preferable to crush or shear streamside woody vegetation rather than completely

413-28-9

remove it. Any locations from which vegetation is stripped during installation of stream crossing should be revegetated immediately after the crossing is completed (WGFD 2004).

413-28

We are concerned with how the formations identified for re-injection relate to the formations that produce the springs that create the stream in the Muddy Creek drainage.

Comments and recommendations specific to the Atlantic Rim DEIS follow:

413-29

Page 4-44, third bullet, "Drainage Crossings: – These would be designed for at the minimum for a 25 year storm event " Designing for 25-year events is not adequate and will result in blown out culverts and increased sediment in the receiving watersheds. We recommend, at a minimum, designing drainage crossings to pass 100 year events as recommended in Appendix J of this DEIS on Page J-11, 5th paragraph: "In general, crossings designed to pass 100 year design storms would in most cases allow for unrestricted passage of flow and sediment from smaller storms." We further recommend that road crossings of the tributaries in the Muddy Creek drainage be designed to allow fish passage at all flows. Types of crossing structures that minimize aquatic impacts, in descending order of effectiveness, are a) bridge spans with abutments on banks; b) bridge spans with center support; c) open bottomed box culverts; and d) round culverts with the bottom placed no less than one foot below the existing stream grade. Perched culverts block fish passage and are unacceptable in any stream that supports a fishery (WGFD 2004).

413-30

Page 4-47, 2nd paragraph: It is good that the BLM and operator recognize the scarcity of wetland and riparian sites within the project area. The RMP indicated minimum buffers are a good start toward protecting these valuable resources. Given the scarcity of these resources the operator should commit to no well locations or ancillary facilities in wetland habitats. Pipelines and roads should only cross-wetland habitats when unavoidable, and at a perpendicular.

413-31

Appendix B, page B-10, 1st Paragraph: "All drainage channel crossing structures should be designed to carry the 25 to 50 year discharge event as directed by the BLM." As pointed out earlier; we recommend, at a minimum, designing drainage crossings to pass 100 year events as recommended in Appendix J of this DEIS on Page J-11, 5th paragraph: "In general, crossings designed to pass 100 year design storms would in most cases allow for unrestricted passage of flow and sediment from smaller storms." We further recommend that road crossings of the tributaries in the Muddy Creek drainage be designed to allow fish passage at all flows. Types of crossing structures that minimize aquatic impacts, in descending order of effectiveness, are a) bridge spans with abutments on banks; b) bridge spans with center support; c) open bottomed box culverts; and d) round culverts with the bottom placed no less than one foot below the existing stream grade. Perched culverts block fish passage and are unacceptable in any stream that supports a fishery (WGFD 2004).

413-32

Appendix B, page B-18, 4th paragraph: "A designated official or responsible party should annually inspect and review the condition of all " Inspection intervals should be

413-32

more frequents, especially early in the field development to issue compliance with all the BMPs, mitigation measures, and stipulations identified in this document. A large amount of resource damage could occur during the 1-year intervals between proposed inspections.

413-33

Appendix B, page B-6, 4th and 5th paragraphs: Both paragraphs discuss establishing staging areas at least 50 feet from drainages or wetlands and hazardous material and refueling areas at least 100 feet from similar areas. We recommend combining the staging areas and hazardous material/ refueling areas into one location a specified distance from sensitive areas. Combining the two areas should result in a reduction in surface disturbance adjacent to sensitive habitats. Furthermore, we recommend adopting the herbicide loading site recommendation from Appendix J, page J-3, third bullet: "Herbicide loading sites would be located at least 500 feet from live water, floodplains, riparian areas, and all special status plant locations". We recommend establishing the staging, hazardous material, and refueling area a minimum of 500 feet from all drainage channel bottoms and wetland habitats.

413-34

Appendix H, page H-7, Water used for construction, maintenance, and drilling activities, #3: We recommend hydrostatic water be re-injected following use.

413-35

Appendix J, page J-7, 4th paragraph: "Pits should be lined if there is not sufficient clay in the building material to prevent infiltration of fluids into shallow groundwater." We recommend all pits be lined as an extra precaution against infiltration of fluids into shallow groundwater. Once a mistake is made and the groundwater is contaminated it is impossible to clean up.

413-36

Appendix J, page J-11, 3rd paragraph: "All crossings should consider the failure of the crossing during flows beyond the design capacity." Although we agree with the strategy of building in a relief valve to limit the damage caused if a drainage crossing is compromised, we contend it is a better strategy to avoid this problem by building the crossing with adequate dimensions to pass all expected flows, including the debris and sediments transported with the flows. As commented previously, we do not believe designing the crossings for a 25 or a 50-year event is adequate. At a minimum we recommend building all crossings for a minimum of 100 year events. This recommendation applies to ephemeral, intermittent and perennial drainages. The design should take into account the active channel and the flood plain. The design should pass both the water in the active channel and drain the water on the flood plain.

413-37

Appendix K, page K-22, 3rd bullet: This requirement is not adequate. We recommend the following language, "Limit construction of drainage crossings to no-flow periods or low-flow periods. Exceptions to this would be granted by the BLM based on an environmental analysis and site-specific mitigation plans."

413-38

Appendix K, page K-22, 7th bullet: We recommend the addition of the following recommendations to provide additional environmental protections for the aquatic resources:

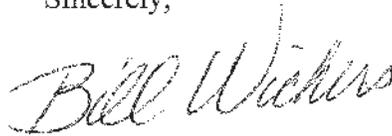
413-38-3 413-38-2 413-38-1

413-38

- All pipeline crossings of a watercourse should be protected against surface disturbances and damage to the pipeline (WGFD 2004).
- Any pipeline crossing of a perennial stream should be done by boring underneath the stream rather than trenching, especially main Muddy Creek and its primary tributaries (WGFD 2004).
- Pipeline crossings can be installed through ephemeral streams by trenching. Use appropriate size riprap to stabilize stream banks. Place riprap from the channel bottom to the top of the normal high water line on the bank at all stream crossings. We recommend double-ditching techniques to separate the top one-foot of stream bottom substrate from deeper soil layers. Reconstruct the original layers by replacing deeper substrate first (WGFD 2004).

Thank you for the opportunity to comment.

Sincerely,



BILL WICHERS
DEPUTY DIRECTOR

BW:VS:gbe
cc: USFWS

Literature Cited

Wyoming Game and Fish Department. 2004. Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitats. Wyoming Game and Fish Department, Cheyenne.

January 25, 2006

Dear Bureau of Land Management:

please add my opposition to the preferred alternative. I highly encourage the BLM to develop an alternative closer to Anadarko's proposed action.

I can't believe the Rawlins BLM is considering an Atlantic Rim DEIS alternative which would hurt the development of natural gas at a time when gas prices are spiking to record levels!

416-1-2
416-1-3
416-1-1
416-1

How is the 160 acre spacing justified? Has the BLM considered the Findings of Anadarko's Field research and the need for 80 acre spacing? Has the Rawlins BLM office considered the economic impacts of not recovering more natural gas from the project area?

The President and Congress have called For more energy development, not less. please Follow the domestic energy plan and the recently signed Energy Bill. I request you withdraw the Atlantic Rim DEIS requirement of 160 acre spacing and work within the existing known science in the area and approve a Record of Decision with 80 acre spacing.

Sincerely,



Mike Vandenberg

Western Wyoming Citizen

January 25,2006

Rawlins Field Office
Attention Public Comments
P.O. Box 2407
Rawlins, WY 82301

To Whom It May Concern:

I greatly appreciate the opportunity to participate in the NEPA process for the Atlantic Rim project as proposed by Anadarko. It is my understanding the BLM is focused in how the full development project proceeds, not if the project will proceed. In general, I do support the development of our own natural resources as the appropriate means to achieve a stronger national security.

I encourage the BLM to consider just a few observations:

420-1-4
420-1-3
420-1-2
420-1-1
420-1

1. Anadarko contributes substantially to our local economies in Carbon and Sweetwater Counties. I do not believe the EIS has focused enough on the positive socioeconomic benefits of the project.
2. Anadarko is a leader in developing environmentally friendly practices in regards to energy development. They have the proven track record to go forward with this project.
3. The BLM is severely limiting the potential extraction of gas by limiting spacing to 160 acres. Anadarko's research proves 80 acre spacing is needed to fully develop the resource. I am hopeful the BLM will amend the EIS to reflect this reality.
4. Will timing restrictions on drilling (only 155 day drilling window in some areas) needlessly create a transient worker base? Will these restrictions dissuade locals from applying for these jobs?

We need more exploration not less. The Atlantic Rim DEIS, as proposed, greatly limits production. My request is for the BLM to amend the DEIS to reflect the need for 80 acre spacing, specifically the proposed action by Anadarko.

Sincerely,



Alan Hayes
Wyoming Citizen

January 25, 2006

RAWLINS BLM FIELD OFFICE
1300 North Third
PO Box 2407
Rawlins, WY 82301

Dear Rawlins BLM Field Office,

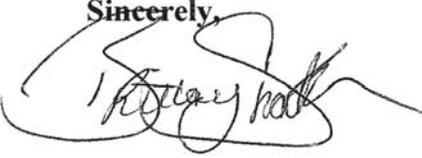
I appreciate your time and hard work on the Atlantic Rim EIS. I recently heard from a friend that you are considering requiring Anadarko to space its natural gas wells by 160 acres instead of the more standard and more successful 80 acre spacing pattern. Past testing by the BLM and Anadarko has proven a need for closer well spacing to succeed in extracting enough natural gas. This "closer" well spacing is still sufficiently spaced to meet all multiple use requirements and leaves a very minor footprint on the areas environment. I think it's entirely reasonable to ask that you allow these wells to be spaced in closer proximity to one another – the more desired 80 acres. Your own BLM team in Casper through its recent report understood this need – I hope you do as well.

424-1-1
424-1

Please treat Anadarko with the fairness it **deserves** and allow the company to space its wells on an 80 acre pattern.

Thank you for your time and consideration of my thoughts in this process.

Sincerely,



Brittany Shaklee

Concerned Wyoming Resident

January 25, 2006

To Whom It May Concern:

I object to the adoption of the preferred alternative in the proposed Atlantic Rim DEIS. More government regulation is neither what the nation nor the President has been demanding. What is needed is more natural gas development.

I support President Bush's energy plan and feel the Atlantic Rim DEIS is moving the Rawlins BLM backwards. I request the preferred alternative and Atlantic Rim DEIS be modified and a new alternative supporting the continued development of natural gas be adopted. A specific area of importance is the BLM's request for 160 acre spacing. Anadarko's field research concludes 80 acre spacing is required for full field development.

My fear is the BLM is ignoring the science and is needlessly leaving over 1 trillion cubic feet of natural gas undeveloped. This is the wrong direction at the wrong time for America's domestic energy needs.

Thank you in advance for considering my comments. I look forward to seeing this worthy project moving forward quickly.

Sincerely,

Angela Pacheco (RS wyo native)

Angela Pacheco

Long-time Wyoming Resident

ANGELA PACHECO (307) 389-9551
322 N St.
Rock Springs, WY 82901

428-1-2

428-1-1

428-1

FEBRUARY 8, 2006

RAWLINS BUREAU OF LAND MANAGEMENT
1300 NORTH THIRD
PO BOX 2407
R.AWLINS, WY 82301

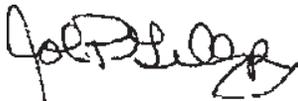
DEAR BLM,

I WOULD LIKE TO TAKE ADVANTAGE OF THE PUBLIC COMMENT PERIOD YOU HAVE PROVIDED TO SUPPORT ANADARKO'S PROPOSED ALTERNATIVE IN ITS EFFORT TO EXTRACT NATURAL GAS FROM THE ATLANTIC RIM AREA.

456-1 | IN PARTICULAR, I HAVE ONE QUESTION I WOULD LIKE TO ASK YOUR FIELD STAFF, DID YOU KNOW THAT OIL AND GAS DEVELOPMENT IN WYOMING CREATES ENOUGH STATEWIDE TAX REVENUE TO PAY EACH CITIZEN A DIRECT PAYMENT OF \$1,500?

I DONT KNOW ABOUT YOU, BUT I THINK THIS IS SOME FAN'TASTIC DATA THAT ALL OF US CITIZENS OF WYOMING SHOULD TAKE ADVANTAGE OF THE BEST PART IS THAT ANADARKO WILL GIVE US THIS BENEFIT WHILE ALSO DEVELOPING THE AREA WITH A PHASED DEVELOPMENT APPROACH IN ADDITION TO PAYING FOR A MULE DEER MIGRATION STUDY. THE FACT THAT ANADARKO IS SUCH A GREAT ECONOMIC BENEFIT TO OUR STATE WHILE ALSO CARRYING ABOUT IHE ENVIRONMENT IN OUR BACK YARD IS A TESTAMENT TO THIS COMPANYS INTEGRITY. PLEASE REMOVE THE LARGE AMOUNT OF UNNECESSARY RESTRICTIONS AND ADOPT ANADARKO'S COMPLETELY REASONABLE PROPOSED AI TERNATIVE THANKS!

THANKS SO MUCH,



▶ JOHN GILLASPY
CONCERNED WYOMING RESIDENT

FEBRUARY 8, 2006

RAWLINS BUREAU OF LAND MANAGEMENT
1300 NORTH THIRD
PO BOX 2407
R.AWLINS, WY 82301

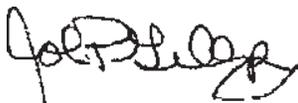
DEAR BLM,

I WOULD LIKE TO TAKE ADVANTAGE OF THE PUBLIC COMMENT PERIOD YOU HAVE PROVIDED TO SUPPORT ANADARKO'S PROPOSED ALTERNATIVE IN ITS EFFORT TO EXTRACT NATURAL GAS FROM THE ATLANTIC RIM AREA.

456-1 | IN PARTICULAR, I HAVE ONE QUESTION I WOULD LIKE TO ASK YOUR FIELD STAFF, DID YOU KNOW THAT OIL AND GAS DEVELOPMENT IN WYOMING CREATES ENOUGH STATEWIDE TAX REVENUE TO PAY EACH CITIZEN A DIRECT PAYMENT OF \$1,500?

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THANKS SO MUCH,



▶ JOHN GILLASPY
CONCERNED WYOMING RESIDENT

460

February 8, 2006

Rawlins Field Office
1300 North Third
PO Box 2407
Rawlins, WY 82301

Dear Bureau of Land Management,

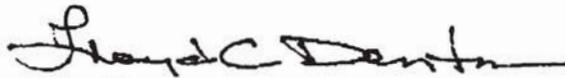
Hot breakfast off the grill, warm showers, electricity, BBQ grills, are just a few of the items that environmentalists enjoy while fighting natural gas development. Natural gas is an abundant clean burning hydrocarbon that is the foundation of our modern and comfortable lives.

What I am trying to say here is that natural resources like natural gas and oil are tremendously vital to the survival of our country. Drilling in the Atlantic Rim field is an incredible opportunity to meet the demands of our nation's growth and corresponding energy needs. In addition, Anadarko most qualified, safest and environmentally conscious company anyone could ask for to do so. Clearly it is a win-win situation that deserves fair treatment of Anadarko, and the methods of development it needs to use in order to successfully develop the field.

Unfortunately, fairness is lacking in several areas in this EIS. These areas include seasonal restrictions, surface disturbance guidelines and numerous water well issues. Most importantly wrong with this EIS is the seasonal restriction portion. By creating only a 135 day window for activity in an area, BLM will essentially be creating a transient workforce through the implementation of this guideline. This type of employment pattern will be detrimental to what would have otherwise been an economic stimuli for Wyoming with the employment opportunities the Atlantic Rim will create. Secondly, these restrictions will severely reduce the production output needed to be profitable for Anadarko. Given Anadarko's contributions through mitigation to this project and many other projects in this state, I would call this very, very unfair.

It is of the utmost importance that the BLM reverse and loosen the seasonal restriction and surface disturbance portions of the Atlantic Rim EIS. Think of the implications to our state and national economies and well-being if you do not. Thank you for your time

Thanks for taking my comment,



Lloyd Denton
1506 Low Court
Gillette Wyoming
82716

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460-1



Department of Environmental Quality



966

To protect, conserve and enhance the environment for the of Wyoming's of current and future generations.

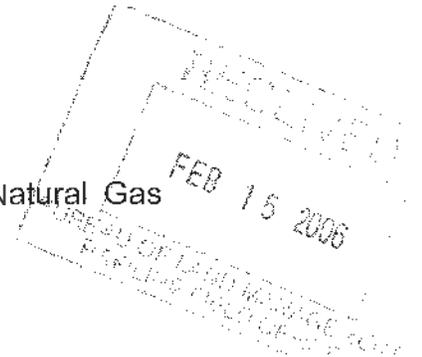
Dave Freudenthal, Governor

John Corra, Director

February 10, 2006

David Simons, Project Lead
Bureau of Land Management
Rawlins Field Office
P.O. Box 2407
Rawlins, WY 82301-2407

re: Response to the Draft EIS for the proposed Atlantic Rim Natural Gas Development Project



Dear Mr. Simons:

These comments regarding the Draft EIS for the proposed Atlantic Rim Natural Gas Development Project are specific to this agency's statutory mission within State government which is protection of public health and the environment.

466-1-1

466-1

Along with the following specific comments regarding the Draft EIS; please consider our comments from January 9, 2006 concerning handling of produced water in the Colorado River Basin submitted with regard to the Rawlins Resource Management Plan. All methods for handling produced water (including surface discharge) should be considered for each individual circumstance. Eliminating the ability to surface discharge limits the options for properly handling produced water.

466-2

1. Page 4-29, Section 4.4.3.1.2 discusses groundwater impacts common to all alternatives. The produced water is planned to be reinjected. Please ensure that the ponds used for holding the water prior to being reinjected, are lined to prevent seepage into the shallow aquifers. If these ponds are not lined, a groundwater monitoring program will be required to ensure the shallow aquifer is not impacted.

466-3

2. In the same section, Page 4-28, a statement is made that "Another impact of the proposed project on groundwater resources, albeit minimal and relatively insignificant, would be an increase in the hydraulic pressure head in aquifers receiving the injected coal bed water." Please explain how it was determined that the impact of injecting between 250,000 to 400,000 of produced water for approximately 30 years will be "minimal and relatively insignificant".

Herschler Building 122 West 25th Street Cheyenne, Wyoming 82002 <http://deg.state.wv.us>

ADMIN/OUTREACH (307) 777-7758 FAX 0	ABANDONED MINES (307) 777-6145 FAX 777-6462	AIR QUALITY (307) 777-7391 FAX 6	INDUSTRIAL SITING (307) 777-7368 FAX 777-6937	LAND QUALITY (307) 777-7756 FAX 777-5864	SOLID HAZ. WASTE (307) 777-7752 FAX 777-5973	WATER QUALITY (307) 777-7781 FAX 777-5973
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466-4

3. In Section 4.4.3.1.2.1, Page 4-29, water injection is discussed. The section does not provide an estimate of the number of injection wells that may be needed. This would be beneficial for permitting planning purposes.

466-5

4. On Page 4-40, Section 4.4.3.2.2, and also in the Cumulative Impacts Section 5.3.4, Page 5-10, no discussion of potential impacts from injecting produced water is provided. This should be included.

466-6

5. On Page 4-41, Section 4.4.3.2.2 the statement is made that "In some cases the reserve pit would be lined." What are the criteria for determining if a reserve pit should be lined? Why not require lining of all reserve pits?

We appreciate the opportunity to comment in this process and look forward to working with you in the future. If you have any questions, please feel free to contact Jeremy Lyon at 307-777-7588.

Sincerely,



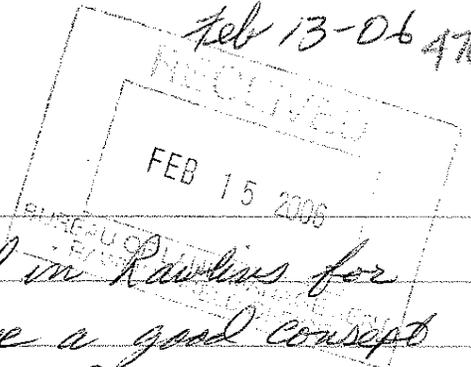
John V. Corra
Director
Department of Environmental Quality

JVC/JFW/JML/jc/6-0132

cc: Governor's Planning Office, Herschler Bldg, 1st Floor, East Wing

dAspcwprd\spc06\atlanticrim_cbm.wpd

Feb 13-06 470



BLM - "ANADARCO"

I have lived in Rawlins for 60 years and have a good concept of animal winter Range. -

These animals need the range to survive especially if we have a bad winter which we haven't had for 10 or 12 years. -

I don't care if you drill the wells, but how much grass are you destroying "winter feed" by putting in all those gravel roads? -

The only solution is increasing and planting more grass with the land you have left.

Anadarco is planning on spending \$1 billion on the project. they will reap \$8 billion Anadarco could spend a little of that money, buy crested wheat, rye grass which doesn't need planted, just spread on the surface of the land. These would be adequate grass for the animals

everyone would be happy. -

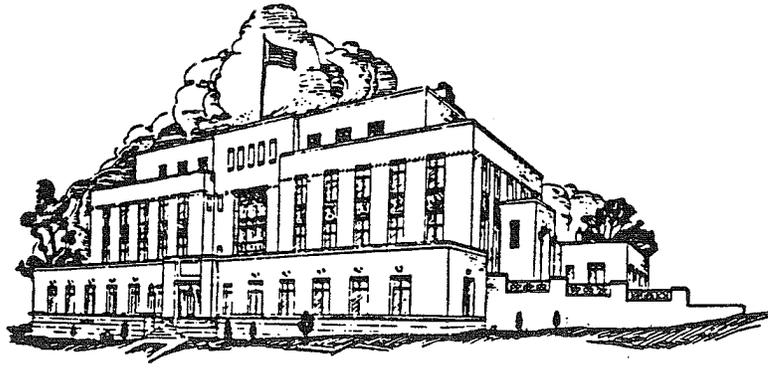
With this project by doing what I suggested, you could improve the land, build a lot of water sheds - plant grass. - Not destroy everything

Drilling, Roads, People, won't bother the animals, they will adapt.

IF They HAVE ENOUGH TO EAT,
DRINK. -

THANK FOR YOUR TIME

KEN FUNK



Art Zeiger, Chairman
Lee Meacham
Linda Fleming

P.O. BOX 6
RAWLINS, WY. 82301
1-307-328-2671

Commissioners of Carbon County
Rawlins, Wyoming 82301

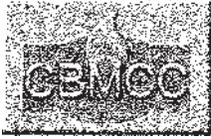
Dear Dave

The enclosed Commentary was prepared for the County Commissioners by B. J. Kristensen of the Coal Bed Methane Coalition. It does a good job of bringing out how I feel.

Kindest personal regards
Art Zeiger

MISSY
-This is for
ATLANTIC RIM
DAVE

RECEIVED
FEB 15 2006
BUREAU OF LAND MANAGEMENT
DAVE'S FIELD OFFICE



Membership: Sheridan, Johnson, Carbon, and Sweetwater Counties
 Lake DeSmet and Campbell County Conservation Districts
Advisory Member: State of Wyoming

CoalBed Methane Coordination Coalition JPB
 760 W. Fetterman
 Buffalo, WY 82834
 Cell: (307) 751-4657

471-1-1

2.2.1 The Proposed Action – The proposed well spacing of 80 acres is appropriate and correct for **CBNG** development. Coal seams are generally lower pressure environments than conventional gas reservoirs and tighter spacing of wells is mandated by this low pressure regime. The well spacing is necessary to prevent waste of the gas resource and insure that the maximum volume of gas is recovered. The Wyoming Oil and Gas Conservation Commission has determined that 80 acre spacing in CBNG development is the optimal spacing, based on reservoir studies of coals throughout the state. A larger spacing may be feasible, but it is not known at this time that wider spacing would effectively extract the maximum recoverable gas resource. Should a larger spacing be mandated, it may be possible that some recoverable **gas** is left in the coal bed and later efforts at removal would be difficult and expensive.

471-1-2

471-1

Appropriate stewardship of the gas, a public resource, dictates that the maximum recovery effort is made to extract all available gas during the life of the development. This insures that environmental disturbance is confined to a one-time effort, rather than being incurred several times as successive efforts are made to remove all of the methane. Adjoining privately held lands may also be developed simultaneously to the development of the federal lands and, since 80 acre spacing is the standard in Wyoming, those developments will probably utilize that convention. This sets up a realistic scenario where development of adjoining properties has a large potential to drain federal gas due to spacing differential. Since federal coal bed gas is a public resource, developed in the interest of the public good, loss of gas through drainage is unacceptable. This argument has been validly used, and has been the main point, in buttressing the arguments for 80 acre spacing of CBNG wells in several other EIS documents in Wyoming authored by the BLM within the past five years.

471-1-3

471-2

2.2.3 Alternative B – Are any provisions made for interruption or changes of the development plan due to emerging information? In other words, do the operators have to follow the outlined sequence exactly as stated in the DEIS, even if conditions warrant a change to the development staging due to discoveries of previously overlooked or unknown circumstances, such as critical habitat or a threatened species? The first, second, and third phases of development are very location specific and would be difficult to follow exactly should future considerations make that sequence undesirable. It is suggested that alternative sequences of scheduling be discussed and allowances be made for possible changes in developmental phases due to unforeseen circumstances.

471-3

2.5.2 Directional Drilling – Further discussion of directional drilling is warranted. The public often uses the concept of directional drilling as a panacea for many environmental concerns. The technical aspects of directional drilling are usually poorly understood, if at all, and a brief

471-3 | narrative describing the unsuitability of this area for that development a process may help readers comprehend the rationale behind the recommendation.

471-4 | **2.5.4 Powerlines and Electricification** – This section is unclear. What mechanism is proposed for electrical generation to run the pumping systems, compressors and other ancillary facilities? Will all lines be buried or will some other methodology, such as solar power or combustion of methane be used to generate power?

471-5 | **Chapter 2 Table; Proposed Action and Alternatives** – The table is an effective method for presenting the actions and alternatives. This type of comparison matrix allows the reader to quickly and succinctly evaluate activities and comprehend the nature of the proposal in a fairly straightforward manner.

471-6 | **CHAPTER 3: AFFECTED ENVIRONMENT** – The descriptions, tabulations, and other supporting documentation within this chapter are quite satisfactory. Great detail has been imported into the document and the definition of the existing environment is well done. Of particular interest are the descriptions of the existing PODs and the conditions that exist there. Were there any reasons established for the condition of the sites as portrayed in the narrative?

471-7 | **Table 3-21.** Special mention of this table is warranted due to the comprehensive nature of the information contained therein. The values for transmissivity and permeability are quite helpful in understanding the character of the groundwater regime and inclusion of these values in this document is appreciated. Also, Table 3-25 is quite helpful with the delineation of groundwater quality compared to suitability standards. Generally, all of the tables and graphs are useful and informative and their inclusion within the narrative is commendable, since they enumerate the variety of resources within the study area and define the environment to a great degree.

CHAPTER 4: ANALYSIS OF ENVIRONMENTAL CONSEQUENCES -

471-8 | **4.1.3.1.3 Paleontology** – The juxtaposition of the first and second paragraphs is quite effective. Paragraph one covers the negative, potentially harmful impacts to the paleontological resources, while paragraph two emphasizes the possibility of new, unexpected resource discovery due to excavation. This duality of results is typical in many types of development where hitherto undiscovered paleontological treasures are exposed by excavating activities, such as highway construction or subdivision creation.

There are many opportunities within the framework of the DEIS to utilize this "good news, bad news" scenario and the entire narrative should be examined to determine where else within the text this may be done. This was also done effectively in the discussion of the soils impacts and certainly assists the reader in determining the suitability of the development plans.

471-9 | **Table 4-1.** – The acronyms RFD and RFFA do not appear to be cited earlier in the text. They may have been defined in another chapter or earlier paragraph, but a footnote on all tables defining the acronym's meaning would be appropriate. The reader must sometimes backtrack or search for an indefinite period of time to relocate the meaning of these components. This is unhandy and makes assessment of the impacts difficult.

471-10 | **Table 4-6.** – Would it be possible to express the well discharge volumes in terms of barrels per month in addition to gallons per minute? Subsequent production records after production commences will use this format with the WOGCC and a good comparison may then be made

471-10

between predicted discharge and actual rates. The data can also be readily used to extrapolate future development in the same geographic area.

471-11-1

4.7.3.1 Direct and Indirect Impacts - Common to All Alternatives – The impacts to large mammal species during development has been found to be counterintuitive to theory when studied in existing, producing gas fields. One would assume an immediate decrease in animal numbers followed by a slow increase over time, just as is posited in the narrative. The actuality is slightly different and long term planning must take this into account. The observations within areas that can be considered mature fields have been that the initial reaction to development by mammals is a decrease in numbers within the area being developed. This is followed by an upswing in the populations due to improved vegetative cover on reclaimed soils; easier travel ways afforded by new roads, and increased water supplies, particularly in areas of surface discharge. In fact, some areas that have encouraged surface impoundment and retention of discharge water have seen game species numbers increase well beyond the natural carrying capacity of the affected lands. Impacts have not been as severe as predicted and mitigation measures have been much less draconian than first suggested. Because of this, some the suggested mitigation measures for the proposed alternatives may be extremes that could prove to be, to some extent, unnecessary in the long term scheme.

471-11-2

471-11

The ancillary developments to gas fields, such as pipelines and underground electrical burial, have proven to be fertile ground for the increase in prairie dog populations as well. Part **4.8.3.2** concerns itself with potential diminishment of habitat for prairie dogs and at first that may be true. The creation of long linear features, however, having a fairly unconsolidated soil texture due to excavation for pipeline or conduit favors the reintroduction of burrowing species. This is found to be true in the CBM fields of the Powder River Basin and reestablishment of predevelopment populations invariably takes place within an astonishingly short period of time that can be measured in weeks.

471-11-3
471-11-4
471-11-5

The data on such effects of development have generally been produced within the energy industry itself, particularly the coal mining sector, and these analyses may be difficult to locate or corroborate. Much of it may be anecdotal and hard to substantiate with any degree of accuracy, though the veracity of these accounts is fairly high. There have been reports of deer and elk, for example, resting beneath dragline housings during periods of equipment inactivity. They apparently have sought these locations for shade and appear completely unafraid of the idle machinery. The long term affects of development on mammal populations is still unknown and ongoing research into this area is warranted. Certain coal mines within Wyoming have had to institute a hunting policy and allow public access to thin swollen deer populations. This is a definite, positive impact on hunting availability and should be addressed as a potential opportunity in section **4.9.3.1**.

471-12

General Methodology - Pages 4-83 and **4-84** are presented in portrait format, as are other pages within the narrative that contain visual information. Would it be possible to set those pages at a landscape orientation to facilitate viewing of the information?

471-13

4.12.3.1.1 Economic Effects – This section is very well crafted and defines the economic impacts to the socioeconomic structure of Carbon County to a remarkable degree. The enumeration of each component of development and the tabulation of costs and benefits assists the reader in their evaluation of these impacts. Are there plans to monitor these potential effects over the next 20 to 30 years? It would be interesting and instructional to ascertain the accuracy of the economic projection to assist in the creation future impact analyses of other developments. This also holds true for part **4.12.3.1.3, Employment and Population Effects**.

471-13

Studies of socioeconomic impacts are now several decades old and this would be an excellent opportunity to determine the accuracy of the models established in the 1970's and 1980's.

471-14

4.12.3.1.7 Local Attitudes, Opinions and Lifestyles — This section is interesting for its unique approach to the cultural values and physiological underpinnings that are often overlooked in impact studies, such as EIS. Frequently, it is this intangible, poorly defined, inner appreciation of an existing lifestyle that produces some of the largest societal impacts within people's spheres of influence; their personal space, for lack of a better term. A dramatic sense of loss can result from changes to the landscape and, more importantly, changes to the local social structure. The coverage of this commonly misunderstood aspect of social impacts is well presented and further amplification of these issues, if possible, is encouraged.

471-15-1

4.15.3.1 Proposed Action — The effects of noise during development is a twofold problem. The first effect is obvious and measurable as sound volume or decibel level. This is fairly easy to document and mitigate, depending upon factors of terrain, wind direction, and other components of the landscape. The second component of sound is frequency and it is significantly more problematic than is decibel level. Many of the large reciprocating compressors have moving parts that emit sound frequencies in the subsonic range; from 10 to 20 Hz. These are also the frequencies at which the human body can achieve a resonant frequency harmonic. The vibrations of the skeletal system when exposed to these low frequencies may produce weakness, fatigue, nausea, confusion, and a host of other ills, depending upon the persons age and weight.

471-15

The US Army medical Corps has documented circumstances similar to this in crew members of Huey helicopter units used during the Vietnam War. The large rotor engines also emitted frequencies in the subsonic range (from 5 to 20 Hz) and a host of medical problems were documented and linked to those sound frequencies at that time. Additional information on this phenomenon can be found by researching the archives of the US Army Medical Corps, available online.

471-15-2

Much of the industrial health and safety literature covers the loudness of sound and defines levels of acceptable and unacceptable sound. The frequency of the sound must also be defined and mitigated in order to protect the health and safety of workers and residents. Many of the new designs for cooling fans used in compressors have moved to a multiple fan, smaller diameter system that raises the frequencies above the threshold limits of human discomfort. In fact, upon installation in the field, it has been found that the noise levels are also lower than in conventional compressor systems and the 55 decibel threshold is closer to the facility, thus creating a smaller footprint for sound containment.

Chapters 5 and 6 and Appendices — The remainder of the document is generally adequate to outstanding in places, particularly Appendix K, in which the participants have committed to minimal impacts or mitigating unavoidable impacts. No further analysis of concerns or additional positive feedback is warranted at this time



Bj Kristiansen, PG
CBMCC - Coordinator

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February 15, 2006

HAND DELIVERED

Mr. David Simmons, Project Leader
Bureau of Land Management
Rawlins Field Office
P.O. Box 2407
Rawlins, WY 82301

Re: Atlantic Rim



Dear Mr. Simmons:

I am submitting these comments as attorney for a number of clients who are landowners and who conduct agricultural operations within the Atlantic Rim Area, as well as on behalf of myself as a lifetime resident of Carbon County.

Prior to the sale of their holdings, my parents were in the sheep business and part of their operations were conducted within the Atlantic Rim area. As a consequence, I am personally familiar with all aspects of the Atlantic Rim area. In addition, the ranchers I represent own deeded lands and hold federal grazing rights within the Atlantic Rim area. Thus, it is from this perspective I make these comments.

It has been my personal experience, in dealing with Anadarko on behalf of my ranching clients, that Anadarko is a "responsible operator." This responsible operatorship has been demonstrated in a number of ways. Anadarko has been fair in their dealings with the surface owning rancher, having shared with them, well in advance, their planned operations and the possible effect these operations may have on other surface uses. In more than one instance, Anadarko has modified its original plans so as to accommodate and assure the continued agricultural use of the lands involved.

I would assume that as a responsible operator, Anadarko would work in the same fashion with the BLM to mitigate the environmental concerns relative to the proposed project and yet allow Anadarko to fully recover the resource it seeks.

From the perspective of an outsider looking in, there appear to be two issues which are at the forefront of the controversy. The first appears to be whether the spacing for wells should be based on

an 80-acre spacing or a 160-acre spacing. Given the fact that Anadarko's proposed action will only disturb 6% of the land for the short term and no more than 3% of the land for the long term, it is difficult to understand why the 80-acre spacing would not be adopted. This is particularly true since it appears that the 80-acre spacing is necessary so that a full recovery of the resource is realized. The following was reported in the Rawlins Daily Times:

BLM's Reservoir Development Group in Casper strongly and repeatedly recommended in a report that Anadarko be allowed to drill eight wells per one-square-mile section of land, or "80-acre spacing," because methane resources in Atlantic Rim probably can't be developed fully with 160-acre spacing, or four wells per mile.

472-1 | As a consequence, it would seem important, at least to this writer, that it would be in the BLM's best interest to adopt the 80-acre spacing so as to assure a full recovery, both for economic reasons and considering the nation's current energy shortage.

472-2 | The second issue appears to be centered around the BLM's proposal to adopt a three-phased development approach. This alternative appears to propose the same number of wells as in the proposed action, but would have the project occur in three phases. The first phase would be developed on a 6 to 7-year period. Consideration of this alternative is apparently based on the premise that Anadarko's development is not phased. However, Anadarko's planned development would, of necessity, also constitute a phased development approach. Under Anadarko's approach, wells would be drilled over a 10 to 20-year period in a sequence that relies on actual geographic conditions and previous operational experience.

472-3 | There is absolutely no way, either practically, financially, operationally, or from an engineering perspective, that Anadarko could drill all of the wells at one time. As a consequence, it would appear that the basis for the three-phased approach is simply misplaced and based upon faulty assumptions.

BLM anticipates that 925 wells (over one-half of the proposed CBMG wells) would occur in the first phase. This conclusion is apparently based on the BLM's assumption that the 925 wells could be drilled within a 6 to 7-year period. What this means is that over one-half of the proposed wells would be drilled in this phase. As a consequence, by concentrating development of over one-half of all wells in the first 6 to 7 years into one-third of the area, there would be a dramatic increase in the activities occurring within the first phased area.

472-4 | As a representative of a landowner owning lands within the first phased area, the significance of these potential centralized impacts is of grave concern. Not only will the centralization of these impacts within a limited area and within the limited time frame significantly affect my client's agricultural operations in a very detrimental and negative way, it will also have a very detrimental and negative impact on the lands within the first phased area, including the soil and water resources as well as wildlife. Anadarko's proposal would, on the other hand, avoid these centralized impacts by spreading the operations across the entire area and over an extended period of time.

472-5 | This proposed concentrated development plan is also patently unfair to those ranching clients who hold mineral rights in what would be phases two and three of the development. For example, the

472-5 holder of mineral rights in the third phase of development would have to wait up to 14 years before realizing any return. In addition, those mineral right holders also could potentially see what would otherwise be an asset in which they have an interest drained by virtue of operations on adjacent but earlier developed lands. This and the denial of access to those owners or leaseholders holding the mineral estate could, and probably will, foster litigation.

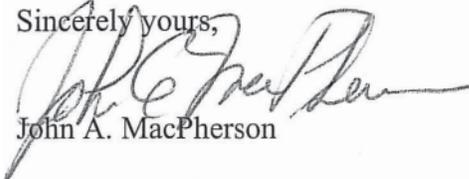
It would appear that the wider spacing and three phase development approach may be an attempt by some within the BLM to appease the Wyoming Game & Fish. My ranching clients are as interested as the Game & Fish in assuring the future viability of Atlantic Rim for grazing, whether it be for domestic or wildlife uses. It must be remembered in viewing the comments of the Wyoming Game & Fish that they are by definition a single-mission agency whereas the BLM by definition is required to take into consideration the multiple use mandate under which it operates.

472-6 We understand that the water realized from the operations will be reinjected. While the rancher supports this concept so as to avoid some of the issues existing in the Power River Basin, it would seem logical, given the arid area involved, to allow some of the water being produced to be used for stock watering and wildlife purposes or by Anadarko as a part of its development activities foisuch things as dust abatement.

From the perspective of the local community, the Anadarko plan makes a lot more sense. It would promote a permanent work force and avoid the boom and bust cycle coupled with a transient work force which will occur under the other alternatives. Elected officials from both Carbon County and the City of Rawlins have endorsed Anadarko's project. The economic viability of our community is depending on it. I don't believe any responsible citizen would advocate total and unrestricted development. However, that is not the alternative being advanced by Anadarko; theirs is a measured approach.

472-7-2 472-7-1 472-7 request that the BLM adopt a plan under which drilling would be conducted on an 80-acre spacing basis to assure maximum recovery of the resource. Finally, we would request that the three phased approach be rejected and what is in reality a less concentrated approach but still a phased approach being advanced by Anadarko be adopted.

We appreciate being given the opportunity to comment and hope that the comments set forth herein will be given the weight to which they are entitled in light of the vested interest that the owners of properties within the Atlantic Rim actually have.

Sincerely yours,

John A. MacPherson

JAM:js

February 15, 2006

David Simons, Project Lead
BLM - Rawlins Field Office
P.O. Box 2407
Rawlins, WY 82301

Re: Atlantic Rim Draft EIS

Dear Mr. Simons,

As a native Campbell County Wyoming citizen currently living and working in Natrona County, I appreciate the opportunity to comment on the BLM draft Atlantic Rim environmental impact statement currently under review.

I find my personal overall sentiments regarding the environmental impact statement are reflected in a recent poll of Wyoming citizens commissioned by the Casper Star Tribune newspaper. That poll found that 17% of those polled cited the state economy, jobs and economic development to be the single most important state issue facing Wyoming today, 15% cited education and school funding, 8% cited mineral development and mining, 2% cited protecting the environment, growth and sprawl, and 1% cited access to public lands for recreation.

I believe Wyoming has one of the best, if not the best, Oil and Gas Commissions and State Lands & Investments public agencies in the country. These state agencies promote and regulate responsible development of the energy industry in Wyoming. I do not believe these state agencies are allowed enough input into federal studies related to development of federal minerals in the state of Wyoming, such as the Atlantic Rim Environmental Impact statement.

In my 62 years, I have spent time as a laborer, a public school teacher, a small business owner, an independent petroleum landman and a staff landman for two or three oil and gas companies and operators. In those capacities I have observed governmental regulation of the Wyoming energy sector ranging from the ridiculous to the sublime. My experience in these capacities also lead me to the following comments regarding the Atlantic Rim EIS draft:

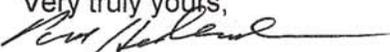
476-1

Phased development should be eliminated as not conducive to responsible development and an overextension of the authority vested in the BLM with regard to its assumed oversight and regulation of private and state owned surface and mineral rights. This alternative appears to set the stage for any number of legal issues involving BLM oil & gas leases, access to private lands and minerals, and contractual obligations to develop leased minerals.

476-2

I believe the alternative requiring 160 acre well spacing should be eliminated. The BLM should give more weight to the opinions of its own very experienced and talented Reservoir Management Group. I believe this group favors 80 acre spacing as do the independent operators in the area.

I do not believe companies who are willing to spend billions of dollars on development of the areas mineral resources and who will be neighbors in the vicinity for years into the future will engage in a "slash and burn" type of development program. These operators have proposed an alternative which should be seriously considered and adopted as the most desirable.

Very truly yours,

Ron Hedlund
2439 Coffman Ave.
Casper, WY 82604



BLM COMMENTS ON ATLANTIC RIM

To start with I have a problem with the sorting off of 16,000 acres of public land for the use and profit of private parties. This action takes away the concept of multiple uses. The draft proposal is written mainly with the oil and gas company in mind. The concept that prior rights and leases have priority seem to have been neglected. Grazing and recreation have taken place on these lands for years before the mineral rights were leased. It appears that the BLM is proposing an oil field with possible uses if it doesn't interfere with the oil and gas company. I was wondering what law the BLM was using to justify the stealing of public lands?

482-1 The talk of reclaiming these places is just talk by the oil and gas company. I would like to have a list of all locations in the proposed Atlantic Rim and have someone show me any of these locations that have been reclaimed. What is the criteria to call a location reclaimed and who gives the grade on this? Another question is who will police the pods and pipelines and what consequence does the oil and gas company get for not doing a job right? I have not seen a pipeline or location that is up to the standards that they are supposed to be. Why doesn't the BLM enforce the same policy as with the grazing rights? If a location or pipeline doesn't meet the requirements then turn off the well or pipeline. The reaction time of the companies would dramatically increase.

482-2 A major concern in the NEPA document is the referral to the Muddy Creek drainage. Over the last 4 years the operators that are out there have worked on the conservation of the stream. Willows and grasses are now growing on the banks and the channel has narrowed. In the document it is implied that the livestock has destroyed the stream and would be blamed for any other damage to the riparian area. I believe that this is very unjust and the blame for increased sediment and damages should be placed on the oil and gas companies. The more roads and locations that are built are more disturbed soils that run into the drainages. Several drainages run into the Muddy Creek system and make their way into the Little Snake River. Why would livestock operators that have spent time and money to improve the system be blamed for the destruction caused by a different operator?

482-3 In the NEPA document I see that not a lot of consideration for soil management was addressed. How will fragile ecosystems such as the Sandhills be protected? This soil will not take abuse that the oil and gas companies have a habit of doing. How the fragile soils be reclaimed and who will police it? As I have mentioned before I have not seen a very good result in reclamation or any consequence for not doing a good job. Will this change or just become BLM policy?

482-4 The BLM has written there is potential for damage to BLM and private fences, cattle guards, and gates. I fail to see who will pay the operators on the grazing permits for the damages or will we have to pay so the oil company can continue to rape the public lands with no consequences?

482-5 Who owns the water rights on federal lands and what is the punishment for damaging the flow and uses that are in place now? The BLM has written that the oil and gas productions will disrupt the flow of streams and wells. Who will have to pay to fix the problem and if it affects the production of an industry that is already in place will the offending party pay the difference in production costs and loss of income? I see no place

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FEB 16 2006

in the document where the oil company is responsible for any of their actions. They need to be held accountable for their actions.

482-6 | How can the BLM justify the disruption of industries already in place and recommend the reduction of 20,000AUMs with no potential reimbursement to the permittee? When will the oil and gas companies have to pay for their actions and not have the government hand them everything.

In closing I would like to say that I disagree with the management plan and that it doesn't address all of the issues and consequences. I would like answers to the questions that I addressed in this letter.

Shawn Foster

Shawn Foster

PO Box 96
Savery WY
82332



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A Subsidiary of
St. Mary Land & Exploration Co.

February 14, 2006

Mr. David Simonds, Project Lead
Bureau of Land Management
Rawlins Field Office
PO Box 2407
Rawlins, WY 82301

I am employed by Nance Petroleum Corporation, a wholly owned subsidiary of St. Mary Land Corporation and a working and mineral interest owner in the Atlantic Rim area of Carbon County Wyoming. As an owner of federal, state and fee leases within the Atlantic Rim area, Nance Petroleum Corporation is concerned about the ability to economically develop our oil and gas minerals under some of the proposed guidelines in the Draft EIS. I would like to offer the following comments regarding the Draft EIS for the Atlantic Rim Natural Gas Field Area prepared by the BLM:

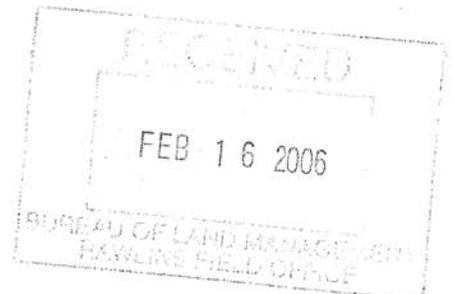
- 483-1 • Any preferred Alternative for coal bed natural gas development in the Atlantic Rim region must consider, at a minimum, development on a basis of 80 acre spacing. Current development results strongly indicate that drilling on a 160 acre basis does not adequately dewater the coal seams and is consequently uneconomic. Alternative C's requirement for 160 acre drilling would essentially shut down coal bed natural gas development.
- 483-2 • Coal bed natural gas development should be allowed to expand in phases without constraints on specific areas as outlined in Alternative B. Coal bed natural gas development by its nature is "phased" development. After a pilot project is determined to be economically viable, drilling continues in concentric bands around the original area, unless geologic factors or surface constraints dictate otherwise. Alternative B, which divides Atlantic Rim into three distinct development areas and calls for the development of these areas at different times, precludes the probability of fair, orderly and potentially economical development scenario. Mineral interest owners in the proposed 2nd or 3rd development phases will be penalized by the delay of development and will potentially suffer from drainage if their lands lie adjacent to current areas of production.

483-3 Nance is in favor of a phased development proposal that would take into consideration the amount of acreage developed annually (vs well count) and not limit drilling to predetermined geographic areas.

Thank you for consideration of the aforementioned items. I am hopeful that the BLM will revise the Atlantic Rim EIS in a manner that will allow for equitable and economic development of mineral interests.

Sincerely yours,

Robin P. Diedrich
Vice President - Southern Rockies Region



490

February 9, 2006

BLM, RAWLINS
1300 North Third
P.O. Box 2407
Rawlins, WY 82301



Dear David:

Your agency has done a great job with the Atlantic Rim EIS with just a few exceptions. Most of the mitigations you have stipulated make sense in protecting the environment; however, I am not pleased that a few of the mitigations make the project infeasible -or at the very least impractical.

The Chamber of Commerce, The County Commissioners, the Rawlins Mayor, the Rawlins Daily Times and many others support this project and the spacing that lease holders in the Atlantic Rim have proposed.

Your agency should take another look at Anadarko's Proposed Alternative and further justify the spacing issues. I think the Casper office's recommendations are closer to what the project needs to move forward.

490-1 | One more question: why would the BLM oppose using produced water to help settle dust on county roads? If the water can be consumed by livestock, why couldn't it be used on gravel roads?

Sincerely,

John Zampedri
244 Tyler St.
Rock Springs, WY 82901

February 9, 2006

Rawlins Bureau of Land Management
Field Office
PO Box 2401
1300 North Third
Rawlins, WY 82301



Dear BLM EIS Staff:

Please add my opposition to the preferred alternative. I highly encourage the BLM to develop an alternative closer to Anadarko's proposed action.

I can't believe the Rawlins BLM is considering an Atlantic Rim DEIS alternative, which would hurt the development of natural gas at a time when gas prices are spiking to record levels!

508-1

How is the 160 acre spacing justified? Has the BLM considered the findings of Anadarko's field research and the need for 80 acre spacing? Has the Rawlins BLM office considered the economic impacts of not recovering more natural gas from the project area?

The President and Congress have called for more energy development, not less. Please follow the domestic energy plan and the recently signed Energy Bill. I request you withdraw the Atlantic Rim DEIS requirement of 160 acre spacing and work within the existing known science in the area and approve a Record of Decision with 80 acre spacing.

Sincerely,

Handwritten signature of Hollie Butler

Hollie Butler
1216 Sigma Dr
Rawlins, WY
82301

February 9, 2006

FEB 16 2006

Dear Bureau of Land Management:

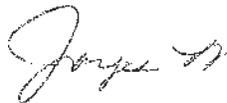
Thank you for allowing me to comment on this very important EIS. I am deeply concerned that the BLM is showing no regard for our national energy needs in its Environmental Impact Statement for the Atlantic Rim Planning Area. I have several reasons for my concern, and, unfortunately, I know that my few concerns are not the only ones. That is why I would like to ask that you adopt Anadarko's Proposed Alternative.

My first *concern* is that seasonal restrictions will only provide at best a 135 day window for production activities to take place. These activities include wildlife studies, cultural studies, reclamation, weed control, pit closures, road construction, well site construction, pipeline construction workover rigs, completion rigs, drilling rigs, centralized facilities construction and a number of other mandatory activities to successful extraction.

My second concern is that under the current draft EIS, ELM is not allowing produced water of livestock quality to be used on roadways into the area for dust abatement. This is, quite frankly, absolutely absurd. Your office should allow more than 4 wells per section in this EIS. You have taken a WGFD Oil and Gas mitigation guideline and amplified it to an unreasonable level. WGFD does not say that surface disturbances should be limited to 4 wells per section or less. Instead, it only said that if it exceeds this number, then recommended mitigation measures should be considered.

I will close with this. Oil and gas production is a cornerstone industry of our nation. Without it, our people would be helpless to mother nature - no heat, no power, no cars... nothing. I am sure every one of you who works for the Bureau of Land Management realizes this when you walk out of your warm house on a winter morning, step into your car or SUV and drive to work. Because of the obvious importance of resources like oil and gas, I would only ask that you offer fine companies like Anadarko more flexibility and reasonable terms when you finish this EIS.

Sincerely,

 6466,

Joyce Allen
PO Box 701
Saratoga, WY
8233i

521-2 521-1

February 9, 2006

Rawlins Field Office
1300 North Third
P.O. Box 2407
Rawlins, WY 82301

Dear Bureau of Land Management:

I am worried about the language in the Atlantic Rim Draft Environmental Impact Statement and how it may affect our state in negative ways if we are not careful.

I believe your preferred alternative states a preference for 160 acre spacing while Anadarko's experience in the area proves the need for 80 acre spacing. My concern is the loss of valuable supplies of natural gas to meet America's energy needs if 160 acre spacing is enforced. Natural gas prices are at all time highs to begin with, and the American public is feeling the impacts on their home heating bills.

545-1 | The BLM is also not focusing on the socioeconomic benefits derived locally from the project. This is a huge mistake! I hope you will compare the severance tax, royalty payments and employment differences between a Record of Decision with 80 acres as compared to 160 acres. I also am concerned timing restrictions/drilling windows in some areas are less than 160 days in some areas. This makes the industry more transient and discourages local residents from applying for these valuable jobs

I hope the BLM will develop a new preferred alternative that better reflects my comments. We need more natural gas development right now, and the Atlantic Rim project can go a long way towards filling those needs of our County and our local economy. Please revert your decision to the Anadarko Proposed Alternative.

Sincerely,

Jim Winchester
811 West St
Rock Springs WY
82701

February 9, 2006

Rawlins Bureau of Land Management
Field Office
PO Box 2407
300 North Third
, WY 82301

Bear BLM EIS Staff:

Please add my opposition to the preferred alternative
encourage BLM to develop an alternative closer to Anadarko's proposed actin.

I call believe the Rawlins BLM Is cashiering an Atlantic Rim BUS alternative,
which would hurt the development of lateral gas at a time when gas Prices are spiking
to record levels!

How Is the 160 acre spacing justified? Has the BLM considered the findings of
Anadarko's field research and the need for 80 acre spacing? Has the Rawlins BLM office
considered the economic impacts of not recovering more natural gas from the project
area?

The President and Congress have called for mere energy development , not less.
Please follow the domestic energy Plan and the recently signed Energy Bit I request
you withdraw the Atlantic Rim REIS re quirement of 160 acre spacing and wort within the
existing known science in the area and approve a Record of Decision. with 80 acre
spacing.

Sincerely,



811

7/06

547-1-2

547-1-1

547-1-3

547-1

548

9 February 2006

Rawlins Field Office
1300 North Third
PO Box 2407
Rawlins, WY 82301



To Whom It May Concern:

I feel very strongly that the Atlantic Rim Draft Environmental Impact Statement under the preferred alternative expressed by the BLM is severely flawed. More specifically, the requirement of 160 acre spacing would eliminate all the many economic benefits that would have occurred under the development otherwise. The Atlantic Rim DEIS as proposed will reduce natural gas development when we are in grave need for more domestic energy supplies.

Wyoming has the opportunity to improve its economy, raise additional tax revenue and supply our country with the much-needed natural gas. What is BLM's justification to limit the project to 160 acre spacing? What is the impact on gas recovery? Does the evidence provide by Anadarko or other BLM offices justify a condensed spacing requirement? What are the positive impacts locally and nationally to maximize gas production in the area? Reading through the DEIS, I see no answers to these questions, and much of the draft is poorly written with no justifications for action whatsoever.

I will look forward to your final decision on the project and would request the project move forward quickly to achieve our domestic energy goals. Thank you for reverting to Anadarko's Proposed Alternative.

With Respect,

[Handwritten Signature]
12975 Sarah's Ln #4
Houston TX 77015

548-1-4
548-1-2
548-1-3
548-1-1

548-1

February 8, 2006

Rawlins Field Office
Bureau of Land Management
1300 North Third
PO Box 2407
Rawlins, WY 82301

Dear Rawlins Field Staff:

I work in the natural gas extraction business and I know oil and gas development can occur in a responsible way. I am extremely concerned the Atlantic Rim DEIS and preferred alternative will limit the development of natural gas in the Rawlins BLM. Specifically, I object to the BLM's decision to limit field development to 160 acre spacing and would encourage the BLM to consider 80 acre spacing to improve gas recovery. Please return this EIS back to Anadarko's Proposed Alternatives.

Let's be realistic - we need the jobs and our country needs the natural gas, and Anadarko can bring us both without harming the environment of the region as many are falsely claiming.

It is estimated the Atlantic Rim contains 1.5 trillion cubic feet of natural gas. This is a tremendous resource that can provide natural gas to over 60 million homes. I hope the BLM will seriously investigate the loss of natural gas recovery by limiting the Atlantic Rim to 160 acres. What is the cost of 160 acres and what are the benefits of 80 acre spacing? What does the internal and external science justify for resource extraction? Has the BLM fully examined the finding of Anadarko over the 5 years of study in the Atlantic Rim area? Can the field be developed efficiently at 160 acres or will we just produce water?

Its now time for the BLM to deny restrictive regulation and let the industry get on with providing the energy resources our nation demands. I am sure the BLM can find cost effective mitigations and still allow 80 acre spacing for beneficial gas development. Please return to Anadarko's Proposed Alternative.

Thank you for the time you are spending on this Environmental Impact Statement.

Sincerely,

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557-1-3
557-1-1
557-1

Atlantic Rim Comments
Barbara Parsons
319 W. Larsen
Rawlins, Wyoming

While I attended the hearing and gave my comments, I wish to add an addendum of concerns that has come to my attention from the hearing or from input after the meeting.

Anadarko is adamantly insisting they be allowed 80 acre spacing. They say that they need this to maximize production. I would submit that they need to address their geological process more precisely. I don't think they have substantiated this need.

Anadarko says that with their lease comes the legal right to maximize their "property" right. But, I would submit that others also have a property right in the same area

For instance, the wildlife in Wyoming belongs to all the citizens of the state. They essentially own it. It is almost certain there is going to adverse effects to that wildlife from industry maximizing their "property" rights with 80 acre spacing.

The ranchers that pay for grazing will have the forage for which they have paid damaged by any development that occurs.

And most important, the public landowners should have their property protected from the "renters" or lease holders on the land. Just as you are not allowed to permanently damage an apartment you rent, you should not be allowed to permanently damage the resources on public land.

The BLM project manager was absolutely correct in saying "getting the gas out is only one of our responsibilities." I urge the framers of this EIS to keep this paramount when the pressures come from Washington and the State Office to bow to industry demands.

I believe that the project needs to be done incrementally for several reasons.

One reason is that by limiting the geographic disturbance to smaller areas, there aren't as many impacts to the wildlife in the watershed. There is also less impacts to ranchers, to the vegetation on the land and to recreationt uses in the area.

Also, some concerns have come to my attention about how re-injection is being done. While initially using old well sites for deep re-injection may be necessary, once the gas has been taken from an area, water from the next site should be re-injected back into the previously dewatered coal aquifer if at all feasible.

The point being that if water is put back into the coal bed aquifer, studies have shown that it is likely organisms in the coal seam interacting with the water will create more gas for the future.

This is another reason for incremental development that plans for a logical re-injection plan that puts water back where it was.

Anadarko stated in their public comments that incremental development is dangerous to their employees. I would suggest that they need to change their operating procedures if this is so. It is not up to the BLM and the Public land owners to mitigate their unsafe procedures.

There is a large push occurring to pipe the produced waters to reservoirs, rivers, or city treatment plants. These waters need to be re-injected. But, if they are not, they need to be treated before release anywhere.

On the other hand, putting these waters into any drainage or reservoir creates a change in an ecosystem. The EIS needs to consider those potential changes to the system and what will happen if they change an ecosystem and production of the water stops.

While BLM considers projects on a district level, I would submit that Coal Bed Methane has become so extensive that it is time to consider the broad impacts that are happening to ecosystems across the state or across geographic regions.

As groups are now considering the survival of species, like sage grouse, BLM needs to consider other broad state, regional or national wildlife impacts to deer, elk and other species. It is also essential to look broadly at the impacts to the air, land and water quality from all the development that is occurring from this CBM industry.

581-2

581-3

581-4

581-5

588

January 23, 2006

Bureau of Land Management
1300 North Third
PO Box 2407
Rawlins, WY 82301

Dear Rawlins Bureau of Land Management,

588-1 | I only have one question regarding the Atlantic Rim EIS: **Why would the Rawlins BLM ignore recommendations from the Casper BLM that 80 acre spacing (for the most part) will not work in the Atlantic Rim Project?**

Anadarko has been drilling test wells and studying the area for over 5 years. Up till now, they have only gotten water from the wells drilled at 160 acre spacing. This isn't going to change, and unless the BLM fixes this spacing issue, there is a chance the Atlantic Rim project will not happen or will be scaled back and will have a limited impact on the economy.

If Anadarko pulls out of the Atlantic Rim it will cost the state of Wyoming Billions in investment. Anadarko is prepared to make a huge and fairly permanent investment in our lives and community if the project moves forward.

I join my friends and family in supporting Anadarko in their effort to let the BLM that the project is important and so is using the science from the pilot project, not from environmental groups.

Sincerely,



JB Anderson
3231 I Street
Rock Springs, WY

590

January 30, 2006

Rawlins BLM Field Office
1300 North Third
PO Box 2407
Rawlins, WY 82301

RE: Surface Disturbance Guidelines in the Atlantic Rim EIS

Dear Rawlins Field Office

590-1

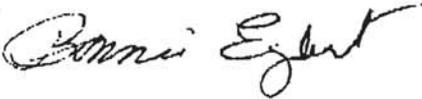
Why is your agency not allowing produced water to be used for dust abatement on county roads? It is not as if this is even something that is cheap for the industry to do. In fact, it is more expensive to do but the industry is willing if the BLM allows them to.

Carbon County is going for a grant to get tax dollars for dust control. Why not just use the water that is produced on site? Water haulers could actually get a beneficial use out of the water. As it stands now, Anadarko is going to be reinserting livestock quality water back into the ground.

Something doesn't make sense here. We live in a desert and we are not going to be able to use treated water for livestock or dust control?

Please reconsider this in the final draft of your EIS and be more specific so the people in Southern Wyoming who could actually use this water have a better explanation as to why your agency will not allow that to happen.

Thanks



Bonnie Egbert
Concerned Citizen
333 Turrett Drive
Rock Springs, WY

593

February 10, 2006

Rawlins Bureau of Land Management
PO Box 2407
Rawlins, WY 82301

Dear Rawlins Land Management Team,

Many people attended the hearing in Rawlins support the BLM and the industry in their attempt to approve the Atlantic RIM Project. I was unable to attend but would also like to show my support for Anadarko's project.

The environmentalists who oppose drilling have relationships with people in the BLM. This is the only explanation I can think of for why the agency is unwilling to consider the possibility that season restrictions may not be the way to go in ALL cases. Sometimes seasonal drilling allows for a more measured and steady approach to drilling as opposed to the rush and hurry that seasonal restrictions cause.

593-1

In the final decision you make, COULD YOU PLEASE DESCRIBE IN DETAIL WHY THE BLM WON'T CONSIDER A YEAR ROUND DRILLING PROGRAM on the Atlantic Rim Project?

Sincerely,

Debbie Rubeck

Debbie Rubeck
Rock Springs
Concerned Citizen and Project Supporter

February 12, 2006

Bureau of Land Management
1300 North Third
PO Box 2407
Rawlins, WY 82301

Dear Land Management Planning Team,

When I heard how many people showed up to the hearing in Rawlins in support of the Atlantic Rim project, I was really impressed. The citizens of Rock Springs, Rawlins, Baggs and Wamsutter know that their future depends on having continued access to resources.

508-1 | I am confused why the Casper BLM supports 80 acres well spacing while the Rawlins BLM doesn't. *Can* you please address this discrepancy in the ROD?

Sincerely,

Kole Egbert
1011 Lincoln
Rock Springs, WY
industry Supporter

603

January 23, 2006

Rawlins Field Office
1300 North Third
PO Box 2407
Rawlins, WY 82301

Dear BLM,

603-1

Your office seems to simply ignore the fact that since Anadarko is going to be injecting all its water, that coal bed methane production in this specific area will have even less environmental impacts than a normal gas well. This means there will be fewer trips to the well and that means less wear and tear on the roads. This should be taken into consideration when applying coal-bed methane mitigations.

This is not in the draft and I would like to know specifically where in the ROD this will be addressed?

Sincerely,



Tiffany Egbert
5 Par Ct
Rock Springs

328-7224

605



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



Atlantic Rim Natural Gas Development Project Draft Environmental Impact Statement
Public Hearing
Rawlins, Wyoming
February 2, 2006

LEAVE ISSUES AND CONCERNS AT REGISTRATION TABLE OR MAIL THEM TO: Bureau of Land Management, David Simons, Project Manager, Rawlins Field Office, P.O. Box 2407, Rawlins, Wyoming 82301-2407.

Please Read Carefully

These forms, including the names and street addresses of respondents will be available for public review at the Rawlins Field Office, 1300 N. Third, Rawlins, 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: Leigh Nation

Address: Rawlins, WY 82301

Zip Code:

Issues and Concerns:

I am in favor of Anadarko proceeding with their schedule & method (80 acre, not 160) of drilling. The benefits economically for Carbon County would be great - the natural gas is greatly needed by the country.

To my understanding - Anadarko submitted their plans in 2001, and have ~~done~~ completed what they said they would do - in good faith. BLM - to my understanding at the public hearing - now wants to change the parameters for Anadarko after all the intervening years 2001-2006. These changes (sequence of the 3 areas to be drilled - reclamation prior to continuing on to the next area - 160 acres, rather than 80 acres)

Signature:

have the great potential of so negatively affecting Anadarko's

plan - yes - and profit - that they might decide to cancel, or significantly reduce their operations.

This possibility would drastically affect the economy here in Carbon County - not to mention a ~~drastic~~ potentially drastic reduction in the number of jobs for BLM + non-BLM people.

605-1 From reports I have heard - the deer + antelope in the Jonah field continue to thrive - perhaps greater game + fish patrols are needed to control the animals taken illegally by the workers - but the wild life are doing ok.

Given the adaptability of elk, deer, antelope + sage grouse - they have the ability to modify their habits + can move to alternative places during the critical winter + birthing months. I appreciate the wildlife and, unless something dire begins to occur - such as a huge die off - calves dying due to drilling - etc - I still think the drilling should proceed.

605-2 Question - at the public hearing, I did not get an answer for the following - the display map for sage grouse covered almost the entire area in blue - no one was able to tell me if these were currently used leks, or are these historically used leks?

605-3 Question - The rigs are still shut down during the sage grouse strutting + hatching season - are they not? - and they are also

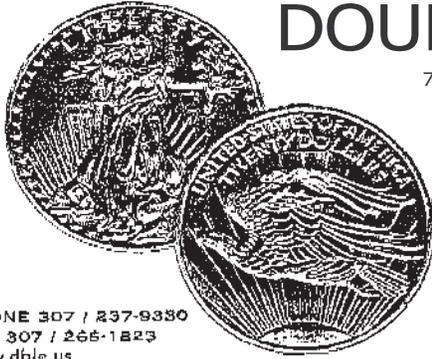
very

605-3
shut down in some critical winter range habitat for elk, deer, & antelope. These shut downs, plus the proposed road drilling within 2 miles of leeks should protect our wild life.

605-4
Question - This has always puzzled me, so I'll ask another question now - why does BLM / game & fish keep putting up Raptor nesting sites around & near the leeks, watering places, etc for sage grouse. I really would appreciate an answer to this also. Thanks for the opportunity to comment.

I can be reached @ nation78@hotmail.com

leigh Nation
2/17/06



DOUBLE EAGLE PETROLEUM COMPANY

777 OVERLAND TRAIL

P. O, 50X 766

CASPER, WYOMING 82602

PHONE 307 / 237-9330
FAX 307 / 266-1823
www.dble.us

February 17, 2006

Mr. David Simmons, Project Lead
Bureau of Land Management
P.O. Box 2407
Rawlins, Wyoming 82301

RE: Draft Environmental Impact Study
Atlantic Rim Natural Gas Development Project Area
Carbon County, Wyoming

Dear Dave:

Thank you for the opportunity to comment on the Draft Environmental Impact Study (DEIS) for the Atlantic Rim Project Area (ARPA). This document will provide for the orderly development of coalbed and conventional natural gas through the next 20 years. The document has taken nearly 5 years to get to this point. I encourage BLM to expedite the remaining portion of the NEPA process wherever possible in order to remain on the time schedule established to complete this document in a timely manner.

Double Eagle Petroleum Company owns and operates the Cow Creek Unit where the initial coalbed natural gas production was initiated in August, 2000. Double Eagle supports the Proposed Action by the proponent to develop the ARPA.

606-1 | The DEIS goes beyond what the National Environmental Policy Act (NEPA) requires in
606-2 | assessing impacts to federal surface and mineral estate. I encourage BLM to assess the impacts
related to the proponent's Proposed Action only. BLM's desire to create an Alternative B and C
creates a unique situation where BLM is actually assessing the impacts of its own proposed
action. Portions of Alternative B and C could be considered as part of the conditions of approval
for proposed future actions on the federal estate but should not be considered as stand-alone
alternatives. However, in the event BLM chooses to evaluate Alternative B and C individually,
Double Eagle offers the following comments.

Planned or phased development as proposed in Alternative "B" is problematic for oil and gas development and the associated infrastructure required. Phased development is better suited for areas where the aerial limits and volumes of a commodity are actually known. Only two Pods in the DEIS have demonstrated economically viable wells. As the development proceeds in the ARPA, operators will impose their own phase-type development based on generally accepted geological and engineering standards and on company imposed economic criteria.

Mr. David Simmons - Bureau of Land Management
Draft Atlantic Rim Environmental Impact Study
February 17, 2006

606-3 | The proposed Alternative C which calls for a spatial development based on overlapping surface conditions could render a great deal of the ARPA available for development with only one wellpad per 160 acres. This alternative is in direct conflict with the 25-page interoffice memorandum prepared for the Rawlins Field Office (RFO) by BLM's Reservoir Management Group (RMG) dated June 15, 2005. The RMG report which was prepared by BLM staff petroleum engineers and geologists states "existing production suggests that 80-acre spacing is the best standard well spacing". The RMG further states that "directional drilling does not appear to be a viable technical or economic alternative because of the severe deviation angle required and would jeopardize many of the proposed well's economics". Double Eagle requests BLM explain why the RMG report has not been incorporated into the proposed Alternatives.

606-4 | The DEIS addressed the management of produced water, mainly through utilizing re-injection into underground reservoirs. I encourage BLM to include additional discussion of surface discharge through National Pollution Discharge Elimination System (NPDES) permits. While BLM's authorization for the management of produced water is somewhat limited by Onshore Order Number 7 of BLM 43 CFR 3160 where Section G states that "Operations from the point of discharge downstream are under the jurisdiction of the EPA or the primacy State", I feel
606-5 | discussion of the benefits of produced water for municipal, agricultural as well as wildlife would be useful. Double Eagle requests ELM include references to Onshore Order Number 7 in the Final EIS and Record of Decision for the ARPA.

606-6 | Protection of wildlife is a vital component of the NEPA process. I encourage ELM to put greater emphasis on currently utilized habitats and less on historic habitats. This management style will direct the greatest amount of BLM staff time toward areas of existing interest. In addition,
606-7 | wildlife monitoring can be a useful tool for BLM and the state game and fish authority. However, these studies should include sections on predator control and captive breeding in addition to the general topics of study. Any cooperative effort should share work and financial responsibilities and be conducted in conjunction with development of the ARPA in order to prevent delays to operators.

The DEIS has taken several more years than was originally forecast on July 10, 2001 when I attended the initial scoping meeting of then PEDCO and other operator's proposed action to develop coalbed natural gas in the Atlantic Rim area, I request that once the Record of Decision for the ARPA is signed, further operations by the RFO be conducted under the policies enacted through the Energy Policy Act of 2005 with particular regard to Section 390 thereof.

Thank you for the opportunity to comment.

Very truly yours,



D. Steven Degenfelder
Vice President, Land