

July 25, 2006

Dear Mr. Linn and Mr. Meyers,

Here are my comments regarding the Sublette County policy document being drafted that regards negotiations with federal agencies and etc:

Due to the extremely rural nature and small population of Sublette County, any type of industrial development near the county limits should be expected to have a relatively large socioeconomic impact on the area.

Sublette County should require that agencies managing development associated with any type of energy extraction provide a locally-employed person charged with monitoring any *ongoing* socioeconomic impacts associated with the development, *in addition to* the socioeconomic impact statements that are often part of environmental impact statements prepared prior to development.

Sublette County should request this person work in tandem with county government officials to accurately provide socioeconomic impact analysis *and* provide socioeconomic impact mitigation recommendations to both the agencies overseeing the development as well as county government officials.

I suggest that any development that will require the employment of more than 250 workers for a period of more than 90 days should facilitate the need for a locally-employed person to provide ongoing analysis and mitigation recommendations.

The agencies overseeing the development should make every reasonable attempt to implement such socioeconomic impact mitigation recommendations while working in tandem with county and local government officials. Due to the previously poor track record of socioeconomic analysis by federal agencies (see the "Socioeconomic Profile" on the Pinedale BLM's RMP revision website at <http://www.blm.gov/rmp/wy/pinedale/documents.html> for a great example of how poor the analysis has been thus far) and a reliance on out-of-state contractors to draft the analysis, I believe that a locally-employed person is the key to useful analysis and successful mitigation.

In Addition:

I understand several other people are drafting comments that regard housing for rotational/temporary workers. The comments ask that: "...Sublette County maintains that large employers (more than 50 employees) should provide housing facilities such as seasonally open RV parks for regular rotational workers for the period between Memorial Day and Labor Day every year. I support these comments; as a housing requirement would make tourist-based recreation more affordable and attractive, and would ultimately reduce the cost of housing.

I would be happy to explain or expand on these comments if desired.

Thanks very much,

Jeffrey Jacquet

Sublette County Socioeconomic Analyst.

O: 367-3631 C: 231-2472 H: 276-5303

[Yahoo!](#) [My Yahoo!](#) [Mail](#) [Make Y! your home page](#)Search: [Web Search](#)**YAHOO! MAIL**Welcome, **flyingpigs2222**  
[\[Sign Out, My Account\]](#)[Mail Home](#) - [Help](#)[Mail](#) [Addresses](#) [Calendar](#) [Notepad](#) [What's New](#) - [Mail For Mobile](#) - [Upgrades](#) - [Options](#)[Check Mail](#)[Compose](#)[Search Mail](#)[Search the Web](#)A MasterCard  
In 3 Days\*[Previous](#) | [Next](#) | [Back to Messages](#)[Delete](#)[Reply](#)[Forward](#)[Move...](#)This message is not flagged. [ [Flag Message](#) - [Mark as Unread](#) ][Printable View](#)**Date:** Wed, 26 Jul 2006 10:56:58 -0700 (PDT)**From:** "janell burk" <flyingpigs2222@yahoo.com> [Add to Address Book](#) [Add Mobile](#)  
Alert**Subject:** Public lands use in Sublette County**To:** [bartmyers@yahoo.ca](#)

Thank you very much for giving ordinary citizens an opportunity to voice our opinions on how we feel the public lands in the county should be used.

First, I would like to identify myself. My husband, Dennis Burk, and I are home owners in Hoback Ranches. We are registered voters and make it a point to vote in all elections. Also, we are members of Linda Coopers SDSBT grass roots organization. I have just read the comments that she has sent to you and I must say that I agree with everything that she says.

Our home in Hoback Ranches is our dream home. After working for 31 years, my husband and I retired and built this house in the area that we have loved for over 30 years -- Western Wyoming. We built here because of the scenic surroundings, the wildlife, and the recreational opportunities that are within sight of our front door. Last fall we awoke one day to find all of this threatened by the Eagle Prospect drilling project that will be going in within 2 miles of our home. This is totally unacceptable.

Sublette County must take a stronger stand in reining in the runaway energy development on all of our public lands. We have already given away the Upper Green and New Fork Rivers to energy development. We must not give away the Hoback. Drilling must be stopped in the

**Folders** [\[Add - Edit\]](#)[Inbox](#)[Draft](#)[Sent](#)[Bulk](#) [\[Empty\]](#)[Trash](#) [\[Empty\]](#)**My Folders** [\[Hide\]](#)[ebaypaypal](#)[Info frm yahoo](#)[personal \(2\)](#)[realestate](#)[travel](#)[See your credit score: \\$0](#)[Flirt via email at Y! Personals](#)[Bad Credit Refinance Rates](#)[Earn a degree in 1 yr.](#)

Bridger-Teton National Forest. The Bridger-Teton National Forest and the Wyoming Range are all part of the Greater Yellowstone Ecosystem. Drilling in the Bridger-Teton would be like drilling in Grand Teton National Park.

It is perfectly obvious that National Forest Service will not stop the Eagle Prospect project and other planned developments. It is up to others to do so. That includes citizens, the county, and the state who must force a stop. Should that project be allowed to go forward, there will be nothing to stop them from developing then entire forest. Enough is Enough. We do not need the Eagle Prospect project. We do not need an "energy corridor" running north or a natural gas pipeline to Jackson. We do not need "man camps" and energy development in this part of the county. We do not need roads cut into designated "roadless" areas of the BT Forest or well pads that, even after they are abandoned, are eyesores that never grow anything but noxious weeds. We do not need increased traffic of huge trucks, and enviornmental hazards like the toxic chemicals used for drilling and extraction of natural gas. We do not need our very limited water supply disrupted and contaminated. We do not need our wildlife frightened away from their traditional areas, or worse killed.

This part of the county needs to be reserved for recreational development, for the fly fisherman, for the outfitters, for the hikers, and the ATV riders and the kayakers.

MY water supply and MY property rights need to be protected by a county that doesn't seem to listen to anyone but the energy crowd. Well, guess what, the county commissioners are elected officials and if the present county commission will do nothing to stop development of energy projects in the Bridger Teton and the Wyoming Range, then I am sure candidates can be found who will want to do that.

I believe that Sublette County's position on all further energy development in the county should be to do everything in its power to stop it. Our county has done enough to fill the energy needs of the nation. At the very least Sublette County should do everything possible to stop all energy development in the Bridger-Teton National Forest.

Janell R. Burk  
P. O. Box 133  
Bondurant, WY 82922

---

Do You Yahoo!?

Tired of spam? Yahoo! Mail has the best spam protection around  
<http://mail.yahoo.com>

7/25/06

Dear Mr. Myers

I'm pleased to have the opportunity to comment on the County's Public Lands Policy.

Without boring you with a lot of detailed, yet important, comments I'm sure you will receive. I'll make my comments short and very broad. We should not turn the north end of the County into an industrial complex like the south end.

On route #191 everything north of the Rim should be protected. Thousands of tourists and vacationers do not come to see drill rigs, pipe lines, gas plants and mountains scarred with new roads, they come to see the beautiful scenery and to hike, fish and hunt etc. These activities have great economic value to the County and the State. Recreational activities have been going on for years and will continue if an industrial corridor is not permitted through this area.

It is as Larson in his history of Wyoming had it about right when he said "It's time to ponder whether what the world wants from Wyoming is worth more than what Wyoming already offers the world."

Thank you for taking the time to consider my comments.

Sincerely yours  
Tim Bond



J. THOMAS JOHNSTON, M.D.

P.O. BOX 1877  
PINEDALE, WY 82941

## PUBLIC LAND USE -----COMMENTS

Living in Sublette Co. since 1958, I have witnessed public lands used through multiple periods, changes, policies, and political agendas for various and sometimes questionable and inappropriate reasons. The following are some conclusions made from these observations.

1] I agree with the statements of the Upper Green River Coalition and the Wyoming Range Group in their attitudes addressing the development of the gas fields of the Upper Green. The high-handedness of the Federal agencies and the lack of consideration of local input as to the repercussions of their escalating policies, as seemingly dictated from the Department of Interior, continue (i.e. the recent decision to drill the sensitive Jack Morrow Hills in Sweetwater County). If you need copies of these positions, contact Linda Baker at [linda@uppergreen.org](mailto:linda@uppergreen.org).

2] Although Wyoming State lands are constitutionally required to benefit schools, dispersal of them, justified by imaginative manipulative accounting, denies and deprives future generations of their use for any humanistic, non-economic reasons, (so necessary in our current world), access for recreation, and other non-materialistic reasons. The authors of the Constitution could not predict this eventuality. Possibly there should be more acquisition from willing sellers, not by eminent domain, to increase the State inventory of this type of resource.

3] When private and public uses conflict (i.e. water use or wild-life considerations), the State should be obligated to protect the more beneficial use—even through purchase of the conflicting private interests- in the public, societal interest-but not through eminent domain.

4] Government agencies should be more supportive and attentive of traditional uses and users, of local opinions and of grassroots advice regarding potential problems arising from their decisions. Dictates from the government centers, when policies are being developed, about what will happen locally, without effective local input, only breeds resentment, hostility and non-cooperation. Attitudes that encourage positive input and local opinion invariably result in a friendly cooperative atmosphere that benefits the community as a whole. Unfortunately, outside lobby interests seem to outmuscle the local influences too often (i.e. well spacing, game corridors, elk/cattle interaction). Changes in the use of, or major construction projects to Sublette Co. owned assets should be open to public scrutiny through a well-advertised hearing process, and public input be solicited.

5] Local community clubs and functions should be welcomed, solicited and encouraged to be able to use government lands—either on a one time or long term basis. When the situation warrants, the local government agencies should be able to give permission without all the bureaucratic hoops (i.e. more local autonomy).

6] Exploitation of public land for the benefit of private interests by one agency should be prohibited, by policy, when another agency disagrees with the decision. (EPA vs. USFS in the Lakeside Lodge project). Local expert opinion should be solicited before any action is allowed.

In summary----The feeling of cooperation, rather than confrontation; the active solicitation, reception, respect and action of government policymakers on local inputs and advice; the respect and acceptance of tradition, non-materialism, humanistic and lifestyle issues as valid considerations in the decisions that form the basis of Public Lands Policymaking will result in the best interaction of all the concerned parties.

Submitted by: J. Thomas Johnston, M.D.  
POB 1877  
Pinedale, Wyo., 82941

July 25, 2006

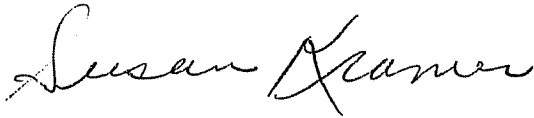
July 27, 2006

Sublette County Planning and Zoning  
P. O. Box 250  
Pinedale, Wyoming 82941

Comments for the Sublette County Public Lands Policy Statement  
Management of Public Lands within Sublette County

Attached are three comments regarding the placement of gas and oil wells near residential development (compressor station buffer, well buffer and recycling produced water).

Thank you for the opportunity to comment on this policy.

A handwritten signature in cursive script that reads "Susan Kramer". The signature is written in dark ink and is positioned above the printed name and address.

Susan Kramer  
P.O.Box 55  
Pinedale, Wyoming 82941

**Sublette County Chamber of Commerce**  
**PO Box 176**  
**Pinedale, WY 82941**  
**(307) 367-2242**  
**[www.sublettechamber.com](http://www.sublettechamber.com)**

July 27, 2006

Sublette County Commissioners  
Pinedale, WY 82941

Dear Commissioners:

The Sublette County Chamber of Commerce Board of Directors would like to submit the following observations regarding "Growth Impacts on our Business Community" for your Sublette County Public Lands Policy Statement.

Challenges:

- **Wages** have risen to levels unrealistic and unsustainable for many businesses; especially the service sector.
- The lack of **affordable housing** limits employers' ability to retain as well as recruit or import staff. Rents are too high for many young families.
- **Child care** costs and a lack of providers and facilities prohibit a second parent from joining the workforce even part-time.
- High **real estate prices** make starting or sustaining a small business more difficult. A diverse business community is very important for the long term stability of the county.
- **Tourism** related businesses are adjusting to fewer overnight visitors and different spending patterns as area lodging remains filled with gas related employees. Area events such as Rendezvous and Chuckwagon Days, attractions including the museums, and outfitters and guides feel this same pinch.

Pluses:

- Increased amenities such as the new pool/rec center, road improvements
- Increased sales tax collections for the towns
- Funding available for a new Visitor Center
- A strong, growing business community

Thank you for considering our comments while preparing your Statement.

Kind regards,

Cally McKee  
As President



## SUBLETTE COUNTY PUBLIC LAND POLICY

Dear Bart

I would briefly like to comment on the proposed Sublette County Public Lands Policy. I believe that a county federal lands policy, as an addendum to the comprehensive plan, is a good idea, provided it is consistent with the comprehensive plan. My main concerns revolve around the process or lack thereof used to present this idea to the public. The scoping meetings were poorly advertised, especially for a document which will lead Sublette County into the future. Those of us on the Planning and Zoning Commission were not formally invited to the meeting, nor were their discussions with the P&Z about the development of a Public Lands Policy, even though the comprehensive plan includes language related to public lands. All of these actions gave the appearance that public and P&Z input was not important.

The consultant did not bring to the Pinedale meeting any process for public involvement, nor any timelines. The meeting was one of the most poorly organized meetings I have ever attended.

Where does the county go from here? If the Commissioners intend to complete a Public Lands Policy for the County, then more public input should be solicited. The logical process would be for the consultant to divide the document up into sections, and then bring in interested community members to comment on and hammer out a policy for each section (wildlife, minerals, grazing, recreation, etc.). Perhaps action items could be identified for each section as well. This type of document can not be completed in two months, if public participation is important. In my opinion two public hearings (P&Z and Commissioners) is not adequate public involvement, considering how important this document could be.

Thank you

Albert Sommers

July 11, '06

Sublette County Commission

Re: Scoping Meeting

Protection of Sublette County Resources.

1. Scenery & air quality
2. Wildlife and unique migration.
3. Tourism economy
4. Hunting & recreation
5. Quality of life-style

Damage to these resources is irreversible.

Protect the Upper Green R., the Bonanza & Hoback basins from rampant oil/gas development, or there will be nothing left that makes this such a special place.

Jane & Bill Olsen  
Bonanza

## **Sublette County Public Lands Policy Statement for Management of Public Lands Within Sublette County**

July 26, 2006

We the concerned citizens ("Citizens") of Sublette County ("the County") have been notified and appreciate that the Sublette County Commissioners have called for citizens' input during the County's creation of a Sublette County Public Lands Policy Statement regarding the management of all public lands with the County. This policy Statement is to be submitted to the Pinedale BLM office during the Resource Management Plan EIS revision; and to the Bridger-Teton National Forest for consideration during the Forest Plan revision. Therefore, we ask that the County Commissioners give serious consideration to these suggestions and include them in the Sublette County Public Lands Policy Statement.

### ***Recreational Opportunities***

**We ask that the County preserve and encourage on public lands the quantity and quality of sustainable hunting and fishing opportunities, viewsheds in areas of high scenic value, non-motorized use, a balanced and coordinated interagency river use plan, further development and proliferation of hiking trails, walking paths, and other facilities for the pedestrian recreationist, biking trails, the non-proliferation of night-time light pollution, cross-country ski trails, and all forms of healthy recreational pursuits.**

### ***Wildlife and Wildlife Habitat Protection***

**We ask that the County establish a "level of concern and action" which is a set percentage of wildlife population and habitat decline that will trigger mitigation action to reduce impacts from natural gas development within existing Sublette County natural gas fields. We suggest that this level of concern be set at 40%, an estimated decline beyond which will be considered unacceptable to the County, as established by the Wyoming Game & Fish Dept. in their annual reports.**

To reduce impacts from natural gas development within existing Sublette County natural gas fields, we ask that the County establish a policy that directs the federal land management agencies to require:

- **Oil and gas companies to conduct remote well monitoring**
- **Piping of condensate and produced water within six months of a well coming online**
- **Directional drilling**
- **A limit of 20 truck trips per pad per day in crucial winter range in the winter**
- **Monitoring by both federal agencies and oil and gas operators of all wildlife species and habitats, by herd unit, impacted by natural gas development, with an annual, publicly-accessible report of the percentage of habitats and species impacted**

## *Air Quality*

Due to increased energy development on public lands within the County, and federal agency policies that will increase this development dramatically in the next half-century:

- **We ask that the County request cumulative analysis of regional air emissions** from the Wyoming DEQ Air Quality Division, in cooperation with federal agencies.
- **We ask that the County request a data compilation and analysis of all emissions measured at the Wyoming Visibility Monitoring Network** (see <http://www.wyvisnet.com/index.html>).
- **We ask that the County establish a ceiling on emissions of hazardous air pollutants**, including all emissions that are monitored and regulated by both federal and state agencies.
- **If WDEQ monitoring shows that we are approaching the emission ceiling, we ask that the County require that there be a limit on the pace of development** until oil and gas operators can implement proven technologies to immediately lower emissions to acceptable levels.
- **We ask that the County establish and enforce stringent dust-control measures on all county roads**, in cooperation with the Wyoming DEQ.
- **We ask that the County create, implement and enforce regulations that specifically address the number, size, capacity, limitations, initial and final product contents, construction, reclamation, monitoring and mitigation plans, safeguards, required setbacks from human residences, and potential human health impacts of all natural gas compressor stations within the County.**

## *Oil and Gas Leasing*

**We ask that the County establish “lease-free” areas.**

While most of Sublette County is leased for oil and gas development, varying between 62 and 92 percent, some areas within Sublette County are simply inappropriate for oil and gas leasing, and should be considered for designation as “lease-free.” Lease-free areas may be (and have been) accomplished by lease buy-backs, lease trading, and lease retirement.

These special places appropriate for “lease-free” designation include the migration corridor bottlenecks at Fremont Lake, Trapper’s Point and Cora Butte, La Barge Creek, and Green River Crossing.

Additionally, crucial habitats appropriate for “lease-free” status include:

- **Wind River Front:** Some 220,000 acres of the foothills along the Wind River Range temporarily withdrawn from leasing should become permanently withdrawn.
- **Wyoming Range Front:** Beaver Ridge, Bench Corral, Ryegrass Draw and Cottonwood Creek are key wildlife habitat areas and migration routes.

- **Crucial winter range and fawning areas:** For pronghorn, elk and mule deer, remaining, intact crucial winter range should be protected with No Surface Occupancy (NSO) stipulations.
- **Sage grouse leks, winter range and nesting areas:** BLM has yet to designate or map winter range and nesting areas for this declining game bird. NSO should cover 3-mile buffer zones around the Resource Area's 176 known leks not yet fragmented. A healthy and reasonable percentage of winter range and nesting habitat should also be designated as "lease-free."
- **Wyoming Range:** providing important summer wildlife habitat and outstanding recreational opportunities.

## ***Water Quality & Quantity***

### *Produced Water*

Oil and gas drilling operators frequently drill water wells to obtain fresh water for use in drilling, hydraulic fracturing, and completion operations on their natural gas wells. This water often is taken from the same freshwater aquifer which County residents use for drinking, livestock and other water uses.

At the same time, oil & gas operators draw tremendous amounts of lower quality water from deeply buried aquifers, and transport this 'produced' water to suitable locations for disposal.

In order to assure that levels of our freshwater aquifers are not unnecessarily depleted, **it is requested that Sublette County maintain the policy position that all water used for oil & gas exploration activities be obtained from produced water sources, recognizing that treatment of produced water may be required to make it suitable for industrial use.**

### *Drilling Muds and Hydraulic Fracturing Fluids*

**We ask that the County require energy companies to fully disclose to the public the toxic chemicals they use during drilling and hydraulic fracturing in the production of natural gas.** This information should also be provided to emergency personnel, fire departments, the sheriff's department, and all potentially affected parties.

Chemicals with known human toxicity are being used by the oil and gas industry in Sublette County. These chemicals attack the nervous system, skin, blood and reproductive organs and can have delayed and long term health impacts as well, including cancer. No disclosure of these chemicals is currently required, either by rule or practice. Hydraulic fracturing treatments use from 50,000 to 350,000 gallons of fluids per well containing chemical mixtures that are forced under high pressure to fracture gas-producing formations. Only a portion of the mixture is recovered, and is stored in open waste pits for reuse or until they evaporate or are hauled away. The rest remains underground.

### *Produced Water Facilities*

**We ask that the County create, implement and enforce regulations that specifically address the number, size, capacity, limitations, initial and final product contents, construction, reclamation, monitoring and mitigation plans, safeguards, required setbacks from human residences, and potential human health impacts of all produced water facilities within the County.**

### *Private Property*

Due to increased energy development on public lands within the County, and the attendant impacts to private lands, **we ask that the County adopt a policy that future oil and gas wells, should be located no closer than one mile from occupied dwellings or land zoned as residential (whichever is closer) at the time of well permitting, unless written permission is given by the affected land owner(s).**

### *Pace of Oil and Gas Development*

Due to rapidly escalating “infill” projects in Sublette County’s major gas fields, with as many as 64 wells per square mile proposed, and as much as 92 percent of county federal lands leased for oil and gas development and new drilling proposals weekly, combined with improved drilling technologies, the high price of oil and gas, and a federal administration push to process drilling permits in 10 days, the County’s rapid pace of development will only become more frenzied. The dire consequences of this pace are tens of thousands of additional, temporary residents crowding our bursting communities and fracturing our already burdened municipal infrastructures; regular exceedances of federal air quality standards, and unacceptable and rapid declines in wildlife populations and their habitats. Private, split estate land owners’ lands are being taken through eminent domain to support additional drilling and development, water quality and quantity are threatened, and our traditional way of life is being torn from its roots.

**We therefore ask the County to require that federal agencies implement a more moderate and sustainable pace of oil and gas development on public lands to prevent widely-acknowledged, unacceptable and irreversible consequences to our communities. A more moderate pace of development will preserve financial benefits from royalties for future generations, and will extend the development of a limited amount of mineral resources, which will only become more valuable over time.**

### *Transportation*

Due to increased energy development on public lands within the County, and federal agency policies that will increase this development dramatically in the next half-century, the County roads and highways that traverse our public lands have become increasingly overcrowded and dangerous. **We ask that the County create and maintain an inter-municipal public transportation system that will help relieve the increasing traffic on our public highways.** Suggested routes are between the towns of Big Piney/Marbleton, Pinedale, Rock Springs and Jackson, with stops at the entrances to the major gas fields. This would allow gas field and other commuters a daily alternative to driving to work, connectivity to the buses

used in the gas fields to transport workers to the sites, and also allow for public transportation to major shopping centers in the region.

**We ask that the County begin acquiring easements and rights-of-way to relocate Highway 191 around the town of Pinedale while that property is available and not yet sub-divided.**

### ***Tourism & Service Industries***

**Due to increased energy development on public lands within the County we ask that the County plan, implement, and maintain County programs that address community challenges created by public lands development:**

- **Maintain adequate staffing for service industries** such as waitresses, cooks, and hotel room attendants
- **Create affordable housing** for service industry employees
- **Maintain affordable, safe and adequate child care**
- **Maintain a viable, renewable tourism industry and support local businesses** by addressing inadequate hotel room availability
- **Secure County funds to maintain traditional, historic, local celebrations** such as the Mountain Man Rendezvous.

### ***Federal Agency Oversight***

**Due to increased energy development on public lands within the County, we ask that the County employ a federal agency liaison, to monitor and publicly report on federal agencies' adherence to Resource Management Plans, Forest Plans, and other NEPA-compliant, established policies for public lands management.**

### ***Clean Energy***

**We ask that the County establish a policy to encourage the orderly, efficient, and responsible development of clean energy on public lands.**

Clean energy is the fastest, cheapest, most reliable way to increase energy supplies and hold down consumer prices. Subject to the same careful, public review as any other energy project, renewable energy sources, namely, wind and solar power and energy efficient technologies are the best ways to protect public resources and sensitive public lands, air, wildlife and water quality; reduce economic pressure and global warming; and provide secure jobs.

Despite record natural gas drilling in Sublette County, consumer rates over the last five years have more than doubled. It is important to develop new energy sources while royalties from older, finite sources are abundant and before non-renewable supplies dwindle. Sublette County is in a superior position to increase energy supplies and hold down prices.

By developing our vast wind and solar energy resources we can help solve our nation's energy problems without sacrificing our most sensitive public lands and natural treasures for a short-term, limited supply of natural gas.

Sublette County should develop and sell its extra wind power to states like Colorado, Arizona, New Mexico, Nevada, California and Montana, whose voters have decided to buy more power from renewable resources, and are among the largest energy consumers in the West.

Thank you for your consideration of these comments.

Representing the Upper Green River Valley Coalition, a Sublette-County based conservation organization with over 380 local and seasonally-local members.

Yours Sincerely,

/s/

Linda F. Baker

Community Organizer

(And)

Ted Porwoll

Karen Rogers

Fran Chilcote

Ed Chilcote

Ron Chilcote





Linda F. Baker  
Upper Green River Valley Coalition  
P.O. Box 994 / Pinedale, WY 82941  
307-367-3670 / [linda@uppergreen.org](mailto:linda@uppergreen.org)

## **Smarter Energy Development in Wyoming's Upper Green River Valley**

### **National Treasure**

Wyoming's Upper Green River Valley represents the intersection of two great resources at the contentious heart of public-lands management in the West. Owned by all Americans are the valley's wildlife--roaming herds of prized big game, disappearing sage grouse and wild trout--and the sea of natural gas underneath this sagebrush-covered basin hemmed by the Wyoming, Gros Ventre and Wind River ranges. In 2005, the energy industry extracted \$4.7 billion worth of natural gas.

Today, more than 90 percent of BLM's Pinedale Resource Area is under lease for oil and gas, with an expected 12,000 or more new gas wells--three times the current number--to be drilled in the next 15 years.

### **Wildlife Displacement**

Wildlife-based recreation is the second largest industry in Wyoming. Yet the Wyoming Game & Fish Department notes that energy extraction poses a serious challenge to Wyoming's hunting and wildlife heritage.

In three new, ground-breaking studies, it has been shown that in areas of energy development in the Upper Green, there has been a 46% decline in mule deer, a 51-89% decline of male sage-grouse lek attendance on impacted leks, and a continual fragmentation of previously undisturbed habitats leading to reduced usage and ultimate abandonment by pronghorn.

### **A Smarter Way**

While the Pinedale BLM is revising its Resource Management Plan, which will guide all management of the 1.2-million-acre Pinedale Resource Area, the Upper Green River Valley Coalition has offered a *Responsible Energy Development Proposal*. **We do not support eliminating energy development, but rather promote "smarter drilling."** We advocate for using the best possible management practices to reduce industry's ecological "footprint"; lessen the potential to displace wildlife and keep drill rigs and infrastructure out of highly sensitive areas. Such measures are not "impediments" to development, but should be considered a reasonable cost of exploiting this rich energy resource.

### **Best Management Practices (BMPs)**

**Clustered development and directional drilling.** Directional drilling accommodates numerous wells on a single pad, recovers gas under sensitive areas and lends itself to clustering infrastructure, decreasing the amount of land disturbed.

**Phased-in development.** Staged leasing within gas fields, in which some blocks are leased while others are withdrawn until a later date, would lessen environmental and social impacts while promoting economic benefits. No new gas fields should be authorized until existing ones have been fully drained and reclaimed.

**Private property rights.** Industry must negotiate with surface owners over the placement of roads, wells, pipelines and compressor stations. Operators should restore water and soil they damage and BLM should give property owners 60 days advance notice of leasing and exploration of the mineral estate under their land.

**Surface protection.** The BLM should limit post-drilling well-pad size to less than 2 acres, require half-mile setbacks from houses, and require closed-loop drilling systems, especially those using water-based fluids. Reclamation should begin within six months of a well's abandonment with the use of native seed mixes.

**Air Quality and noise standards.** Best available control technology (BACT) should be applied to all gas-well operations. Stringent dust-control measures, a ceiling on emissions of hazardous pollutants and a slower pace of development should be required.

**Wildlife and habitat protection.** Remote well monitoring, piping of condensate and produced water would reduce human intrusions into sensitive areas.

**Watershed protection.** No development should take place in aquifer recharge zones, on grades exceeding 25 percent, within 500 feet of riparian areas, or when soil is saturated.

**Monitoring.** Stations to monitor ambient air quality must be maintained and publicly accessible in each gas field. BLM should also establish a water-quality monitoring network around the entire resource area and help fund ongoing wildlife studies.

**Waivers and exceptions.** Drilling stipulations, such as seasonal closures and buffer zones around sensitive habitats, will only protect wildlife if they are enforced. These rules should be waived only under rare circumstances.

### **Lease-Free Areas**

Endorsed by the Wyoming Game & Fish Dept., some areas are simply inappropriate for oil and gas leasing. These places include migration corridor bottlenecks at Fremont Lake, Trapper's Point and Cora Butte, La Barge Creek, and Green River Crossing.

**Wind River Front:** Some 220,000 acres of the foothills along the Wind River Range temporarily withdrawn from leasing should become permanently withdrawn.

**Wyoming Range Front:** Beaver Ridge, Bench Corral, Ryegrass Draw and Cottonwood Creek are key wildlife habitat areas and migration routes.

**Crucial winter range and fawning areas:** For pronghorn, elk and mule deer, remaining winter range should be protected with No Surface Occupancy (NSO) stipulations.

**Crucial sage grouse leks and nesting areas:** BLM has yet to designate or map winter range and nesting areas for this game bird. NSO should cover 3-mile buffer zones around the Resource Area's 176 known leks not yet fragmented.

**Lease-free areas** may be accomplished by lease buy-backs, lease trading, and lease retirement. Our vision accommodates development while protecting a quality of life for our children to enjoy far into the future.

# Citizens Protecting the Wyoming Range

"Enough is Enough"

PO Box 84

Daniel, WY 83115

(307) 859-8896    [jamerine@wyoming.com](mailto:jamerine@wyoming.com)

July 25, 2006

Sublette County Commissioners:

As a group of concerned outfitters, ranchers and citizens living in Sublette County, we are deeply concerned about the oil and gas leases being offered in the Wyoming Range.

Mineral extraction is an important part of Sublette County's economy and the benefits cannot be ignored. But at the same time, the pace of energy development is beyond belief. Oil and gas developers can not keep up with the equipment and manpower needed in areas already under energy development at this time. The County has an obligation to its citizens to conduct balanced and responsible development in areas that won't negatively impact other Wyoming businesses, including tourism, ranching, and recreation. We are dedicated to the State of Wyoming, to Sublette County; and to the quality of life for our families and visitors; we and our children will be here long after the energy companies have left the County.

We believe that there is no need to start any new energy development in the Wyoming Range. More than 150,000 acres is already leased for energy development. Some traditional, long-lasting County revenue sources could be jeopardized if new oil and gas projects start up in the Wyoming Range. More than 35 outfitting businesses operate in the Wyoming Range. Outfitting businesses represent a rapidly growing sector of Wyoming's economy. In 2004, over 10,000 hunting licenses were used in the Wyoming Range which produced an economic return of nearly \$4.5 million for nearby communities. The Wyoming Range is home to four native species of cutthroat trout and in 2004, \$9.1 million in angling expenditures occurred in the Bridger-Teton National Forest. State wildlife officials say wildlife watching in the Range generated nearly \$25 million, supporting 613 jobs. Outfitters could see their business dwindle as their clients choose other places to visit. Ranchers with grazing permits in the Wyoming Range will also be adversely affected. Above all, local County residents who use the Wyoming Range for a multitude of recreational activities will have their outdoor experience impacted negatively. For ours and future generations, it is equally essential to preserve wildlife habitat and the rich diversity of wildlife that inhabits the Wyoming Range. It is the duty of our elected county officials to steward the "multiple use" objectives of our lands.

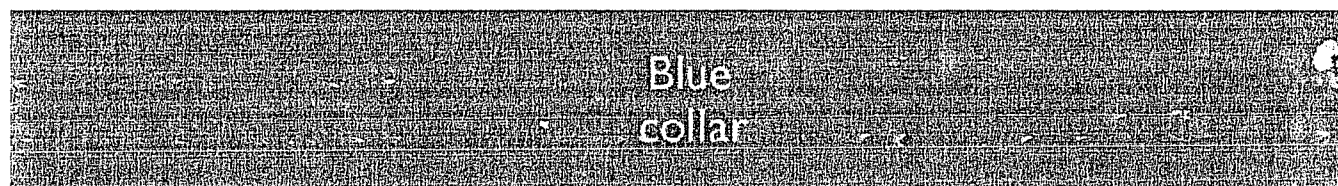
Our elected officials are responsible for fostering the proper development of a quality community, with diverse and sustainable revenue sources. "Man-camps", drug abuse, higher crime rates, and exploitation of our resources are the pitfalls of "out of control" development that will only degrade the idea of a quality community. We should have the fortitude and vision to force energy development at our pace, and have the courage to exclude certain areas. This oil and gas development path has led to single-resource use in the Jonah and Pinedale Anticline

Enough public land in Sublette County is already under lease to keep oil and gas operators busy for decades. We call on our County Commissioners in their development of a public lands use policy to keep the Wyoming Range for its long-time traditional uses and not for new energy development.

Thank you for your consideration in this matter.

Gary Amerine  
Acting Chair – Citizens Protecting the Wyoming Range

[Yahoo!](#) [My Yahoo!](#) [Mail](#)
[Search  
the Web](#)
[Search](#)

 Welcome, **bartmyers**  
[\[Sign Out, My Account\]](#)
[Mail Home](#) - [Help](#)

[Mail](#)
[Addresses](#)
[Calendar](#)
[Notepad](#)
[What's New - Options](#)
[Check Mail](#)
[Compose](#)
[Search Mail](#)
[Search the Web](#)
[Previous](#) | [Next](#) | [Back to Messages](#)

 working.com  
 Find your job

**Folders**
[\[Add - Edit\]](#)
[Inbox](#)
[Draft](#)
[Sent](#)
[Bulk](#)
[\[Empty\]](#)
[Trash](#)
[\[Empty\]](#)
**My Folders**
[\[Hide\]](#)
[Alibris](#)
[Attorney Corres...](#)
[BCC](#)
[Computer and Pr...](#)
[County Public L...](#)
[Houses](#)
[Planning and Zo...](#)
[Project Corresp...](#)
[Rich Greenwood](#)
[Town of Pinedale](#)

 working.com  
 Find your job

[Delete](#)
[Reply](#)
[Forward](#)
[Spam](#)
[Move...](#)

 This message is not flagged. [ [Flag Message](#) - [Mark as Unread](#) ] [Printable View](#)
**From:** "Peter Teller" <rimstorivers@msn.com> [Add to Address Book](#)
**To:** bartmyers@yahoo.ca

**Subject:** Sublette County Planning suggestions

**Date:** Wed, 26 Jul 2006 13:28:00 -0600

As I return to Hoback Ranches from Pinedale on almost any occasion, my eye catches the Wyoming State Centennial Scenic Byway road sign, although I hardly need reminding. The highway travels up through the open cattle and ranching country defined by magnificent mountain ranges on both sides and to the north as well. River bottoms and willows hide families of animal life. The sage changes from bright green to dull gray with the passing of seasons. The aspens too show the seasons, especially in fall. The whole scene rapidly and unforgettably changes with the crossing of the "Rim" and the opening of the Bondurant / Hoback Basin. It is special country. You are no longer in a drainage that ends in the warm waters of the lower Colorado and Gulf of Mexico, but one that flows ultimately to the northwest and adds itself to the cooler waters of the Columbia River system. ...A whole different way of life.

To protect and shelter this very special part of our Sublette County, Planning should consider this very different environment and its special character as it go forward; its waters, air, vistas, forests, and open space to name a few. North of the Rim, there should be no reason to develop neither industry nor an industrial corridor. It is too special, too fragile, too irreplaceable.

At minimum, borrowing from the Good Neighbor Agreement,

a Project of the Northern Plains Resource Council, Billings, Montana, we should assure that the County Plan includes:

- A provision for citizen oversight of industrial development to ensure protection of the area's quality of life and productive agricultural lands.
- Establishes clear and enforceable water quality standards that go above and beyond State requirements.
- Provides local communities with access to critical information about industrial development and the opportunity to address potential problems before they occur.
- Ensure public safety and security while protecting the interest of the industrial developers through traffic plans designed to reduce drilling traffic on country roads. Explore all option for busing and carpooling.
- In advance of any fires and / or serious incidents involving the community and environment, in cooperation with local and federal agencies, draft and train to action plans for all types of emergencies. Invest in equipment, tools, and personal protective equipment along with their training and application well in advance of any incident.
- In cooperation with the Agencies and industrial developers, initiate and implement public services especially medical and law enforcement well in advance of the anticipated rate of industrial development and the resulting population "boom", proactively, rather than reactively.
- Raise the bar for environmental excellence by setting goals and objectives for developing new technologies

Not just that portion of Sublette County "...over the Rim" needs these cooperative efforts, but the County as a whole. To see what can happen if left uncontrolled, look to the north in Alberta and the oil sands development around Fort McMurray that has seen their remote population grow from 8,000 people to 70,000 in 15 years due to unplanned and uncontrolled energy development.

Regards:

Pete and Sandy Teller

36 Kismet Road, Hoback Ranches,  
Bondurant, WY 82922

Delete	Reply	Forward	Spam	Move...
--------	-------	---------	------	---------

[Previous](#) | [Next](#) | [Back to Messages](#)

[Save Message Text](#) | [Full Headers](#)

## **Sublette County Planning Process**

**Some assumptions I have had to make in lieu of clarity about this exercise:**

- Community "visioning" efforts (what we want the county to look like in the future) do not often take place in the way in which this effort has been designed. Rather it takes more time, usually uses such techniques as focus groups, survey instruments, data collection and analysis and is thoughtfully managed so as not to bias the process and produce thoughtful results. Given the fact that planning is not a Sublette County strong suit, and there is no guidance from the County or its consultants; the following may not necessarily be structured to meet county information gathering outcomes. Rather, the comments that follow are organized according to the priorities as I see them, and reflect broad categories based on my personal priorities.
- The County is looking for citizen "vision" concerning the future of Sublette County because the "business as usual" assumptions are under criticism.
- Because the BLM-county relationship is not interdependent, one can only surmise that neither the Bureau nor the Department of Interior has motivation to listen to the citizens of Sublette County. Never-the-less, the county wants to be relevant to the BLM RMP. Because the BLM is substantially overdue in the completion process and one can only presume that in order to make its plan more complete, county input is useful and may be taken into account.
- The citizens of Sublette County are beginning to feel the full force and effect of unbridled energy development and documenting what citizens have to say is a way for the county to perhaps mitigate those impacts through the BLM RMP process and look for a better balance.
- The county is straining under the local impacts related to excessive energy development. Many, who may have been supportive of energy development with a "the more the better" attitude are rethinking their support. For most there is a reality question of how best to use the excessive revenues. However, the reality is that the county needs a plan whether or not the BLM cares, and no matter how much or little money it has.

---

**The following is for the County Planning and Zoning effort and for the Bureau of Land Management, (BLM) Resource Management Planning (RMP) process.**

### **Economy**

The Sublette County economy has had no community development strategic plan and has moved from one boom and bust economic/energy cycle to another. County action has largely been reactive and shaped by the largess of the natural environment and energy resources, and economic and governmental forces beyond its boundaries. It has limited its vision and thus narrowed its choices. Without a concerted effort to define a forward economic strategy, the county has placed itself in a high risk position. Of course doing nothing is the easy way out. Work isn't required to receive payments for resources that others develop. Real economic development is a serious challenge.

The economy of whole greater Yellowstone region of Wyoming is dependent upon natural conditions that further community growth, infrastructure development, tourism, outfitting, agriculture, and local small business. Sustainable economic development, the kind that doesn't despoil the mountains, air, water and endanger indigenous wildlife, for example, represents the "highest and best use" of the natural environment and preserves future community options most effectively.

A service economy comprised of small businesses to meet local needs of the community and tourists is sustainable and preserves the kind of lifestyle most people who live here value. Agriculture, ranching, and wild places filled with healthy wildlife contribute to the economy.

Energy development as the sole source and driver for the economy of the county is counter productive because along with it comes the ultimate destruction of the natural environment that the county and region must depend upon in the long run. Miles of roads, man camps, pipe yards, and influxes of guest workers, destruction of wildlife and their summering and wintering grounds will turn the county into an undesirable place for the long run. The environment, the natural bounty that makes the county desirable is being undercut by energy development as the single economic focus.

The county should develop a policy of containment as it relates to energy development. It should play an active role in reducing the impacts of energy development by engaging the federal agencies and private land owners to contain the size of the energy footprint and seriously and effectively mitigate the impacts of energy development. To date it is merely "lip service" not serious mitigation.

Unbridled energy development is inconsistent with a sustainable future, and is ultimately a self-defeating strategy.

Sublette County has demonstrated a lack of imagination, and has not made investments to meet the real needs of the community. Managed growth, affordable housing, recruiting and training a service labor force and the recognition that an aging population is an opportunity, are among a few of the areas not sufficiently recognized as important in Sublette County. A local community with quality small businesses, (services and trades,) agriculture, communications, healthcare, recreation, outfitting, education, but not just public schools K-12, and the arts are the basis for a sustainable economy set in a pristine environment.

Revenues from energy development need to be invested in protecting and monitoring natural resources and the desired pre-conditions for sustainable development, infrastructure, programs, local business and human resources.

### **The Environment**

The environment in the county is diverse. It is basin and range, public lands and private lands. It has narrow passes, canyons, high mountains, wide valleys, sage brush flats, wetlands, small residential enclaves, large lakes, historic wild river systems and small downtown areas. It has national forests and public parks. It has wilderness, sprawling ranches, unique wild herds, endangered species, raptors and cranes... and until recently clear skies. It has both water rich and water poor locations, and much more.

That diversity provides a strength that is under-recognized, under-utilized, and disrespected by a one policy, support energy development, fits all approach. The diversity of the natural and built environment needs to be accounted for.

For example, the northern part of Sublette County the Upper Bridger Teton National Forest is recreational, residential and agricultural, yet the county is silent and complicit when energy development threatens to spread industry where it is inappropriate, unwanted and threatens vital migratory links for wild game, and the water supply for ranches and private landowners. Housing values in Sublette County are plummeting as a result of the devaluation of private lands threatened by industrial activity and pollution. Nobody wants to live where they can't see the mountains.

Road sprawl, meth labs, and pipeline corridors are direct threats to environmental conditions, yet little is done by the county to stop networks of roads and corridors that have developed to support energy company access to locations. As regional development outside Sublette County continues to occur, the county will feel continuing pressure if it maintains its bias in favor of energy development to the exclusion of everything else. As long as the county is non-assertive in terms of a real community plan that takes into account the whole county not just Pinedale and Big Piney it will be remiss in its function as a county.

Roads and proposed pipelines, as is the case of the 92 mile Lower Valley pipeline through for example sensitive areas including wetlands (that are the potential recharge zones for fresh water supply), 9 Hoback River crossings, helicopter pipeline inspections and more...signal a significant deterioration in the both the physical landscape, (scars forever,) and have the potential to have deleterious long term impacts on quality of life. It is ostensibly good for the contractual partners the producer of the gas and Lower Valley that sells gas retail in Jackson, but what about the people of Sublette County and the environment, and lifestyle that is sacrificed so these companies can have their way. It was Lower Valley's choice to move from an all electric utility to gas. They are simply being opportunistic in establishing the pipeline. However, when the field runs dry, they will encourage further development to support what will likely become a larger appetite for gas, and that means in Sublette County's backyard we will have sacrificed for decisions made by others with no choices except to go along. This is what happens when the county is turned into a resource colony for others. That is not a future worth subscribing to.

Air pollution from diesel trucks, chemical releases from energy operations can and are causing not only air pollution affecting lakes, soils, and mountain top snow melt, but have the potential to cause long term health affects because the pollutants are "air toxics" and produce damage to lung tissue in vulnerable populations (seniors and children.) The county can hide from things it may not want to fully understand, but it has a duty to manage the county affairs on behalf of its citizens. To ignore the serious affects on the long-term economy, water supply and water quality, and public health that result is simply negligence. I do not want to see a county with blinders on in the future.



## **The Alternative Vision**

I can see a county initiated land inventory completed, and zones of sensitivity designated in cooperation with the Fish and Game and Federal Land Managers and citizens on board. I see a true economic development planning process in the works complete with community participation and real outcomes. I can see the blank slate filled in with enterprise zones complete with state and county investment strategies to make the best and highest use of various areas of the county for non-energy based development and job creation. I see a labor force analysis done to see what kind of human resources a certain level of effort will take to meet economic targets. I see an infrastructure assessment done to understand the support requirements for sustainable economic growth. I see these and other structures to support a real economic plan.

I see an environment that has clean air and non-acid lakes. I see recreation, tourism, and residential growth as the primary underpinning of a service economy. I see educational facilities to train people to meet service and trade jobs. I see a Sublette County Community College with a broad curriculum, including distance learning capabilities, a campus, and specialized training programs from small business management, to health care provider training and facility management, land stewardship, environmental science, water resource management, and wildlife biology. I see adult education complete with programs from literacy, to photography, film-making and more.

I see the scope and scale of the Pinedale Anticline and Jonah Fields curtailed back to earlier pre-PAPA levels. I see serious air pollution monitoring done for the air toxics that are not currently being effectively monitored. That would be followed by mitigation to stop pollution. I see no further land areas committed to energy development, and the Upper Bridger Teton and Wyoming Ranges off limits to development. I see the county actively working to change the image of the county so it is friendlier to recruitment of young people and families to become permanent residents, entrepreneurs and workforce to meet community needs.

## **Conclusion**

I have long since concluded that for the BLM, Sublette County is the "sweet spot." Anything they want they can get and there will be no objections from the County. As long as that cash cow keeps the dollars flowing so another pool or whatever can be built, its ok! Perhaps now energy development is over-the-top, and people are waking up, the Commissioners are the last to figure out that this may be "too much of a good thing."

SDSBT was created October 25, 2005 at Hoback Ranches after the BLM announced their approval of the South Rim Unit that includes 19,400 acres, 50% BTNF land and 50% Hoback Ranches land. The group is now nearly 500 and has members from Pinedale, Merna, Daniel, Bondurant, Hoback Junction, Jackson and elsewhere. We are water poor, wildlife rich, and scenically well endowed; we vehemently oppose the three proposed wells on the BTNF; oppose the industrial corridor that is in effect the result of the BLM ramped up lease sales since Beaver Creek last December and up through the most recent in June. Where has the county been in understanding our point of view? Where is the County in supporting the protection of the Upper Bridger Teton NF and the Wyoming Range? Where is the County in supporting its communities? The County has a policy of one size fits all and that is a wrong policy. We want recreational, wildlife rich and healthy forested public lands. We want the South Rim Unit undone, the suspended leases traded out, and the whole area taken out of play.

The northern part of this county is agricultural, and residential. It is not industrial. It has no infrastructure to support energy development; it is wildlife oriented and recreational. The County has done nothing to evaluate where it is appropriate to develop energy and where it is not. The county has not engaged with BLM except to say "no problem here." The county has an implicit policy of drilling any where, anytime, under any circumstances and it is greed at its most flagrant. We want scenic and recreational values to be sustained. We do not live here because it is industrial rather we want our private lands not to just survive despite energy development, but to be recognized for its values. The Jonah Field and the Pinedale Anticline are prime examples of energy development without restraint. The decrease in air quality is obvious. The impact on mule deer as a result of drilling in their wintering grounds is documented. One doesn't have to be an air pollution specialist or a wildlife biologist to figure out that what was once pristine and abundant is no longer. Pinedale used to be known as a recreational small, high value community. No longer. Energy development has run amuck and you are not seriously listening! If there is seriousness to this planning effort, then it is possible to turn things around. If this is an honest effort and not just a political maneuver in an election year, then the county can expect support for its honest work.

**Linda J. Cooper, Spokesperson, SDSBT  
(Stop Drilling-Save the Bridger Teton)  
P.O. Box 121  
Bondurant, WY 82922**



## COTTONWOOD RANCHES

120.28 Hwy 189 N  
Big Piney, Wyoming 83113-8801  
doubledishpan.com 307-276-3558



Sublette County Commission

### Comments on Oil and Gas Development in our county

There is an overwhelming amount of support that is growing in the west to limit the overbearing development of oil and gas. From our republican senators and governors to ranchers, people have had enough. We all agree that we need these resources, but they should not take precedence over the land that we depend on, the land that we live for, and work with. There has to be more control over how these resources are extracted, on a local level. Cottonwood Ranches has had first hand experience with the conflicts and benefits of oil and gas developments on our land.

Ranching is a celebrated history and the root of the culture in this county. Oil and Gas development is bringing tremendous growth to our community in good ways and bad. No one can deny that we are in an energy boom cycle all across the state. However, on a state and local government level we can administer some control stops to elongate and mitigate the adverse affects of this boom cycle.

If our county government can have influence over the mineral estates that threaten the very ranches that make this county what it is, then by all means we should exercise that right. The mineral owners in their corporate office buildings, who have no concept of the effects of their actions other than their stockholders interest, have more power over the final development outcome in this county than our own county government. That is wrong. As a county we should have an Energy Development Zoning Plan. We should have the power to protect the place that we know and love. We live here, the mineral owners do not. They do not have pictures of cattle, horses, and cowboys in the Wyoming Range on their walls. Their interest in our county translates into numbers, quantified values to a spreadsheet on the boardroom wall. These open places that we still have, that many more people are now enjoying, do not have a quantifiable value. These places we are all concerned about are a matter of heart, a matter of history, an issue that is not easily discarded.

Limiting the growth of O&G development with a thought out Energy Development Zoning Plan can be beneficial in many ways. What is required here is good design, comprehensive, well thought out design. Rushing into things rarely ever has a good outcome. There should be more focus on clustering developments and requiring directional drilling in more sensitive areas. When those clusters expire they then become replaced with the next development stage. Thoughtful planning of view shed corridors, on-site mitigation with vernacular screens such as pseudo hay corrals to disguise low profile tanks. This would elongate the economic cycle and values of the resources that will be extracted, allow for us to benefit from the evolution of drilling and distribution technologies of the future. This would insure a place for Oil and Gas to contribute to the rich history of this county in a much more positive way along the side of the ranchers, trappers, pioneers, and Native Americans.

The Castle Creek oil and gas development on the back end of Cottonwood Ranches is located on an island of BLM that is surrounded by our private irrigated meadows and pastures. It is a great

example of a cluster development. There is no directional drilling in this location but it would have benefited tremendously if they had. The only reason it could be considered a cluster development is because there is no other Oil and gas development near it. It is isolated by the great open lands of ranches and allotments and forest. Without isolating the impacts of these developments when they encroach on our ranches, and the places that are dear to our communities, we sacrifice unquantifiable values for the benefit of stockholder reports in these energy companies. What would the cost for design be for those companies? They would mean delays, but these costs would be fractions of a penny on the dollar to them.

There are people in these oil and gas companies who want to do more. But without the regulations to require them to do more they are bound by the company to spend the least amount of money possible. If they were to go against that basic corporate principle they would lose their jobs.

The bottom line for this county is growing, exponentially. However, that growth is not only due to Oil and gas development. It is growing with people who are coming here to enjoy this place for what it is, for the wildlife, the open spaces, clean air, clean water, and our history and culture. As a county we might not be able to exert much control over the federal lands that dominate our land base, but we can have a strong and decisive voice that matters, and will be heard. As a county we can also construct an Energy Development Zoning Plan for the private lands in the county that would deter mineral development from community sensitive areas and concentrate them elsewhere. This plan could greatly increase the needed protection for surface owners, for our ranches, for our people.

Thank you for taking the time to come together on this issue to make a difference, to take a stand, for the people you represent.

Freddie Botur  
Cottonwood Ranches

## Comments on Proposed County Public Lands Policies

By Jo Crandall

PO Box 99

Pinedale, WY 82941

1. I think there is merit in having a public lands policy.
2. I think the policy should be an extension or included within our current County Comprehensive Zoning Plan which was prepared with in put from a wide array of local groups and citizens. It is important the two plans are coordinated; therefore the County Public Lands Policy needs to be part of the county comprehensive plan.
3. In order for the CPLP to be valid it needs to be based on a wider sample of the county citizens whom it will impact. All groups need to be invited to the meetings including people who originally worked on the county plan. The people who were able to attend the meetings in Pinedale and Big Piney are not a large enough sample upon which to base this policy.
4. This project has the potential to be a major component of the comprehensive plan. The meetings to discuss this issue were not sufficiently advertised in order for the local population to be aware that they were being held and to contribute their ideas.
5. The timeline that was tentatively set at the meeting is too short to do justice to the information that needs to be collected.
6. It would be very helpful to have an outline from the consultant and/or Mr. Linn detailing all the potential areas that could/should be covered by government agencies in their review process. I would have liked to have had that available at the first meeting I attended.
7. I found the presentation by the consultant very confusing. I think a handout of exactly what the goals of Mr. Linn's proposed project consist of would be very helpful.
8. The in put from Perry Walker, Linda Baker, Suzy Micnevich and Albert Sommers was very informative. There are other people who are equally knowledgeable whom we should also be seeking out and collecting additional information from regarding areas that need to be addressed by this policy.
9. If we are going to do it, let's do it right.

## Issue 1: Growth of industrial support facilities in the field

The Commissioners should consider putting forth in its comprehensive management plan arguments designed to bring about consolidation of industrial support facilities. Currently, one needs only to drive the Lumen Road in the vicinity of the EnCana field operations center and warehouse/shop yard to see a large and growing collection of industrial buildings that provide office and shop spaces for company personnel. Additionally, literally every well pad includes a tank battery to store produced water and condensate gas as well as a dehydration building and in many cases there are four or more such dehydrator shacks. Finally, there are large parking yards for heavy equipment and big-rig trucks.

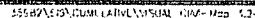
A comprehensive management plan might be well designed if it includes provisions to "incentivise" the operators in Jonah and the Anticline to consolidate their office and shop facilities in a very few locations. There should be no reason why operators would find fault with the idea of existing next door to each other in a kind of industrial camp. From a zoning perspective, this arrangement would also limit the need to proliferate commercial power line support, potable water supplies, and waste management logistics for each operator in individual camps. Finally, consolidation would lower the incidence of human interference with the movements and day to day presence of all forms of wildlife native to the areas in question as well as reduce the removal from use by wildlife those acreages that are being consumed by these individual industrial facilities.

## Issue 2: Air quality protection incentives

The Commissioners should consider putting forth in its comprehensive management plan arguments designed to "incentivise" operators to engage in proactive efforts to seek out and implement ever improving methods of emission reduction for BOTH drilling operations and well head production facilities. While air quality regulation is in fact the chief purview of WYO-DEQ, it is nevertheless a fact that that agency can be influenced to take action by the "urgings" expressed by the citizenry and certainly the County Commissioners. A common argument offered by industry and its supporters is that they are not to blame for all visibility degradation taking place. This is true. However, empirical evidence is accumulating which shows that industry is a growing significant contributor to the total problem. It is logical to counter argue that there is no reason to allow industry the freedom to exacerbate a clearly increasing visibility problem, and indeed it is good business for industry to undertake efforts to address those emissions that are within its control.

It is therefore appropriate and indeed essential that operators be conditioned to address their production emissions in light of the many assessments by industry that 10,000 to 15,000 wells are a distinct possibility in Sublette County. Each tank battery and dehydrator combination emits, by industry's own calculations, VOC's and HAP's in the range of 4 to 12 tons per year. Simple arithmetic shows the potential to be tens of thousands of tons of these pollutants per year, even though wells will be in various stages of initial production and production decline. County Commissioner efforts to address this long term issue will lay the foundation for air quality protection for literally three future generations of Sublette citizens.

R. Perry Walker



**Subject:** Comments about development of Public Land Policies

I've been following articles in the local newspaper regarding an effort to develop county policies related to public land. It appeared there was a meeting held a few weeks ago about this topic and as a result, the public was allowed to provide testimony there and encouraged to submit additional comments afterwards. I'd like to take advantage of that to provide you with my thoughts.

Because I was not in attendance at the meeting and have not spoken with any of the organizers of this effort first-hand, I want to be careful not to overstate my position. What I can share with you is what my reaction has been based on reading the articles and hearing from people whose opinions I respect that were present at the recent meeting with John Linn and Dave Allison.

I strongly urge that any thing of this magnitude go through the County Planning and Zoning Commission for their discussion and input into the process. The P&Z participated in a three-year revision of the County Comprehensive Plan and are very familiar with the need for public input in the planning and policy setting process. In the case of the County Comprehensive Plan, they put out a call for volunteers and developed the plan based on the direct participation of 40 residents of Sublette County. After the draft was completed, they held public hearings for the final adoption of the plan. The end result was the creation of a policy document that guides and directs development in the entire County which was adopted with very little public controversy.

The goals and policies of the Comprehensive Plan impact all of Sublette County, whether it is public or private land. In addition, the County Zoning Resolution applies to the entire county. Given that the County Planning and Zoning Commission oversees both the Comprehensive Plan and the administration of zoning, I believe that they are the proper body to help facilitate community input in the development of any policy development regarding public lands. Whether the final policies are included in the Comprehensive Plan or bundled together as a separate document is up to the County. But I very much believe that the process needs to be coordinated with the County P&Z.

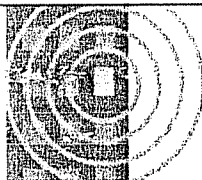
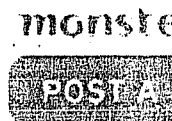
Thanks for this opportunity to provide input, and please let me know if you have any questions about my comments.

Joanne Garnett, FAICP  
Sublette County Planner, 1997-2003

Joanne Garnett, FAICP  
WLC, Inc.  
PO Box 1519  
Pinedale, WY 82941

200 Pronghorn  
Casper, WY 82601

[Yahoo!](#) [My Yahoo!](#) [Mail](#)
[Search the Web](#)
[Search](#)

 Welcome, **bartmyers**  
[\[Sign Out, My Account\]](#)
[Mail Home](#) - [Help](#)
**Target**  
 the position.

 The fast, easy way  
 for employers to find  
 great local talent.

[Mail](#)
[Addresses](#)
[Calendar](#)
[Notepad](#)
[What's New - Options](#)
[Check Mail](#)
[Compose](#)
[Search Mail](#)
[Search the Web](#)
[Previous](#) | [Next](#) | [Back to Messages](#)

 working.com  
 Find your job

**Folders**
[\[Add - Edit\]](#)
[Inbox](#)
[Draft](#)
[Sent](#)
[Bulk](#)
[\[Empty\]](#)
[Trash](#)
[\[Empty\]](#)
**My Folders**
[\[Hide\]](#)
[Alibris](#)
[Attorney Corres...](#)
[BCC](#)
[Computer and Pr...](#)
[County Public L...](#)
[Houses](#)
[Planning and Zo...](#)
[Project Corresp...](#)
[Rich Greenwood](#)
[Town of Pinedale](#)

 working.com  
 Find your job

[Delete](#)
[Reply](#)
[Forward](#)
[Spam](#)
[Move...](#)

 This message is not flagged. [ [Flag Message](#) - [Mark as Unread](#) ]

[Printable View](#)
**From:** Ldgoodman1@aol.com [Add to Address Book](#)
**Date:** Sat, 15 Jul 2006 12:44:11 EDT

**Subject:** [Fwd: Comments on the County policy statement regarding public lands](#)
**To:** bartmyers@yahoo.ca

**Forwarded Message** [ [Download File](#) | [Save to Yahoo! Canada Briefcase](#) ]

**From:** Ldgoodman1@aol.com

**Date:** Thu, 13 Jul 2006 20:38:03 EDT

**Subject:** Fwd: Comments on the County policy statement regarding public lands

**To:** bartmyers@yahoo.com

**HTML Attachment** [ [Scan and Save to the Computer](#) | [Save to Yahoo! Canada Briefcase](#) ]

**Forwarded Message**
**From:** Ldgoodman1@aol.com

**Date:** Thu, 13 Jul 2006 20:24:24 EDT

**Subject:** Comments on the County policy statement regarding public lands

**To:** bartmyers@yahoo.ca

**HTML Attachment** [ [Scan and Save to the Computer](#) | [Save to Yahoo! Canada Briefcase](#) ]

Bart --

Thanks to you and Commissioner Linn for the opportunity to share my thoughts about what the county's policy should be regarding use of public lands in Sublette County.

My family has owned property in the Upper Green for 40 years and we have watched the private lands evolve in use over time. As these inevitable changes



occur, we have noticed the need for greater reliance on our public lands in order to protect the public wildlife and open space resources that are so special to this area. Specifically, we would encourage the county to embrace the following policy:

1. No development on public lands north of the 40-rod road leading up to and into the Upper Green River Valley. This area is home to incredible wildlife species and has suffered greatly from the unfettered subdivision. Industrial development of the public lands would remove the one safeguard our wildlife have.
2. No further degradation from present levels for air pollutants, including visibility. While the Clean Air Act focuses on health-based pollutants, in this area, our pristine air quality and enormous viewsheds are coveted by visitors near and far. While the state and federal policies currently allow more pollution up to federal standards (including significant visibility degradation), we would like to see the County policy to be no further degradation in order to encourage voluntary measures by emitters to minimize new emissions.
3. An aggressive policy to emphasize the importance of our game and bird wildlife populations, and the importance of protecting migration corridors, winter habitat, as well as breeding and nesting areas. Again, these areas have been dramatically impacted in the last 40 years, and while still significant populations, we should do all that we can to lessen the additional stress on them.
4. An aggressive anti-drug policy for use of illegal drugs on public lands. With the energy boom has come a dramatic increase in the abuse of methamphetamine. We would appreciate the County taking an aggressive stance that illegal drug use in Sublette County is not to be tolerated.
5. A recognition that the public lands within Sublette County are an integral part of our community and our growing tourism industry relies on vast, untouched spaces that are rare to find in any other place.

Thank you for this opportunity to comment.

Sincerely,

Laurie Goodman  
Box 2136  
Pinedale, WY 82941  
367-4282

[Delete](#)[Reply](#)[Forward](#)[Spam](#)[Move...](#)[Previous](#) | [Next](#) | [Back to Messages](#)[Save Message Text](#) | [Full Headers](#)[Check Mail](#)[Compose](#)[Search Mail](#)[Search the Web](#)

Copyright © 1994-2006 Yahoo! Canada Co. All rights reserved. Terms of Service

NOTICE: We collect personal information on this site.

To learn more about how we use your information, see our Privacy Policy

July 25, 2006

Dear Commission:

We are writing in response to the meeting held by Commissioner John Linn concerning development of Sublette County's Federal Land Management Policy. The future of the economy and lifestyle of Sublette County is tied strongly to the management of surrounding public lands.

Meaningful interaction with the Federal Land Management agencies requires more understanding and commitment to balanced multiple uses than a series of position statements, which was suggested as the objective of requesting public input. While a hired consultant may be useful at times, we submit that permanent county residents have equal or greater experience with federal land management, including NEPA and other planning requirements. Opening a broader dialog with Sublette County residents should be pursued by the County, rather than bringing in outsiders who have no personal stake in Sublette County's future.

One valuable attribute of public lands in Sublette County is wild, undeveloped country - both sage deserts and mountains. The attached report, *Backcountry Bounty: Hunters, Anglers, and Prosperity in the American West*, was presented early this month to the Western Governors at their Association meeting in Sedona, Arizona. Its message is simple: permanently protected wild, undeveloped, non-roaded lands adjacent to western communities are of economic, as well as aesthetic, value. Such lands attract hunters and anglers to places like Sublette County and they spend money here and are a significant part of the economy. Data from the Sonoran Institute show that communities with such protected wild lands are growing significantly faster than those without such values.

Therefore, we specifically ask that our Sublette County Planning and Zoning Commission consider these values and economic implications in all of its interactions concerning public land management.

We suggest that the position of Sublette County representatives to Forest Service and Bureau of Land Management planning should be to: Maintain a clear balance between all actions that might reduce the wild character of public lands in the County and the critical need to keep as much of the county as wild and undeveloped as it was when Jim Bridger saw it.

This position needs clarification for its effective implementation. Achieving this goal of retaining wildness requires balanced attention to, and management of, recreational uses, transportation systems, consideration of changing use patterns, traditional uses (like grazing and timber management), growth of our communities, and the juggernaut of energy development that is changing the face of the County.

Recent decisions to develop west from Pinedale without regard to a known antelope migration and the decision to pave Paradise Road directly across major antelope migration routes seem to have included no real thought to alternatives or to the impact on one of Sublette County's major wildlife species. Loss or major reductions of these antelope are examples of loss of wild values. We are only five years away from remembering the Mesa and Jonah areas in their undeveloped

state. The uprising of Sublette County landowners, outfitters, hunters, anglers, and out-of-county users over energy development in the Wyoming Range while public land plans are still under review reflects the value of wild country to a diverse array of citizens. This concern is substantially based on the lack of comprehensive plans for energy development, the already evident losses on developed lands, and the great uncertainty about what is next for the highly valuable wild character of Sublette County.

Your adoption of a County policy to maintain the wild character of public lands and consider each step in additional uses, roads or energy development can have a positive economic and social impact on our future. We urge you to think broadly beyond position statements and regularly seek input from County residents.

Thank you for the opportunity for input. We will also send these comments and the attachment by regular mail.

Sincerely,

Rollin and Bettina Sparrowe

*Rollin D. Sparrowe*  
*Bettina Sparrowe*

**From:** "Rollin Sparrowe" <rds@centurytel.net>

**Cc:** "Rollin Sparrowe" <rds@centurytel.net>, <bat@centurytel.net>

**Date:** 7/26/2006 11:40:54 am

**To:** <dkstaley@sublettepz.org>

**Subject:** Comments on County Public Lands Positions-Attn: Bart Myers

default.htm

Dear Sublette County Commission:

We are writing in response to the meeting held by Commissioner John Linn concerning development of Sublette County's Federal Land Management Policy. The future of the economy and lifestyle of Sublette County is tied strongly to the management of surrounding public lands.

Meaningful interaction with the Federal Land Management agencies requires more understanding and commitment to balanced multiple uses than a series of position statements, which was suggested as the objective of requesting public input. While a hired consultant may be useful at times, we submit that permanent county residents have equal or greater experience with federal land management, including NEPA and other planning requirements. Opening a broader dialog with Sublette County residents should be pursued by the County, rather than bringing in outsiders who have no personal stake in Sublette County's future.

One valuable attribute of public lands in Sublette County is wild, undeveloped country - both sage deserts and mountains. The attached report, *Backcountry Bounty: Hunters, Anglers, and Prosperity in the American West*, was presented last month to the Western Governors at their Association meeting in Sedona, Arizona. Its message is simple: permanently protected wild, undeveloped, non-roaded lands adjacent to western communities are of economic, as well as aesthetic, value. Such lands attract hunters and anglers to places like Sublette County and they spend money here and are a significant part of the economy. Data from the Sonoran Institute show that communities with such protected wild lands are growing significantly faster than those without such values.

Therefore, we specifically ask that our Sublette County Planning and Zoning Commission consider these values and economic implications in all of its interactions concerning public land management.

We suggest that the position of Sublette County representatives to Forest Service and Bureau of Land Management planning should be to: Maintain a clear balance between all actions that might reduce the wild character of public lands in the County and the critical need to keep as much of the county as wild and undeveloped as it was when Jim Bridger saw it.

This position needs clarification for its effective implementation. Achieving this goal of retaining wildness requires balanced attention to, and management of, recreational uses, transportation systems, consideration of changing use patterns, traditional uses (like grazing and timber management), growth of our communities, and the juggernaught of energy development that is changing the face of the County.

Recent decisions to develop west from Pinedale without regard to a known antelope migration and the decision to pave Paradise Road directly across major antelope migration routes seem to have included no real thought to alternatives or to the impact on one of Sublette County's major wildlife species. Loss or major reductions of these antelope are examples of loss of wild values. We are only five years away from remembering the Mesa and Jonah areas in their undeveloped state. The uprising of Sublette County landowners, outfitters, hunters, anglers, and out-of-county users over energy development in the Wyoming Range while public land plans are still under review reflects the value of wild country to a diverse array of citizens. This concern is substantially based on the lack of comprehensive plans for energy development, the already evident losses on developed lands, and the great uncertainty about what is next for the highly valuable wild character of Sublette County.

Your adoption of a County policy to maintain the wild character of public lands and consider each step in additional uses, roads or energy development can have a positive economic and social impact on our future. We urge you to think broadly beyond position statements and regularly seek input from County residents.

Thank you for the opportunity for input. We will also send these comments and the attachment by regular mail.

Sincerely,

Rollin and Bettina Sparrowe

P.O. Box 415

Daniel, WY 83115

Rollin D. Sparrowe  
Box 415  
Daniel, WY 83115  
307-859-8351 office  
307-231-9911 cell

Backcountry\_Bounty\_Final\_5-25\_lo-res.pdf

## O&G Well Buffer Surrounding Residences

**Background:** The Sublette County Comprehensive Plan does not address the placement of oil and gas wells. Written long ago, State of Wyoming Oil & Gas Commission (WOGCC) Rules do specifically allow for oil and gas wells to be constructed as close as 350 ft to a residence (WOGCC Rules, Chapter 3, Section 22, Paragraph b). Signed in 2000, the BLM Pinedale Anticline Project Area (PAPA) Record of Decision (ROD) prescribes that, 'on Federal lands and minerals' 'no well will be located closer than 0.25 miles from a dwelling or residence' (PAPA ROD, p. A-23). But these restrictions by other agencies have not kept up with the times. Five years ago, directional drilling in Sublette County was very rare and of only very limited offset distance, whereas now directional drilling technology routinely allows for bottomhole off-sets of a half mile on the Pinedale Anticline. Offset capabilities are sure to increase even further in the near future.

**Proposed Policy:** Future oil or gas wells should be located no closer than one mile from occupied dwellings or land zoned as residential (whichever is closer) at the time of well permitting, unless written permission is given by all affected land owner(s).

New York Sub Division Land Owners  
Hank Snow HANK SNOW

200 S. County Rd. 123

John Schwabacher  
18 Meadow Lane, Pinedale

LESLIE Schwabacher

JACKSON SCHWABACHER

JACKSON Schwabacher

DAN Farrand

Nora Farrand

Kurt Durrant

Susan Kramer

SUSAN Kramer

## Compressor Station Buffer Surrounding Residences

**Background:** The Sublette County Comprehensive Plan does not address the placement of compressor stations. The Pinedale Anticline Project Area (PAPA) Record of Decision (ROD) requires that, 'on federal lands and minerals', 'To avoid incremental risk of exposure to carcinogenic toxins from compressor facilities, any compressor facility located closer than four miles to a dwelling or residence will require additional NEPA analysis prior to selection of the site and authorization to construct.' (PAPA ROD p. A-23) Clearly four miles was deemed sufficiently close to be of potential health concern, but a clearer and geographically broader policy is needed to assure protection of the health and safety of Sublette County residents.

**Proposed Policy:** Future gas compressor stations should be located no closer than four miles from occupied dwellings or land zoned as residential (whichever is closer) at the time of facility permitting, unless written permission is given by the affected land owner(s).

Michael J. Kramer  
1 Meadow Lane

Susan Kramer  
1 Meadow Lane

Hank Brown  
200 S. County Rd. 123

John Schwabacher  
18 Meadow Lane, Pinedale

Jackson Schwabacher

Norma Farnard  
RV - to - Pinedale  
#21 Newfork Socine Cullis

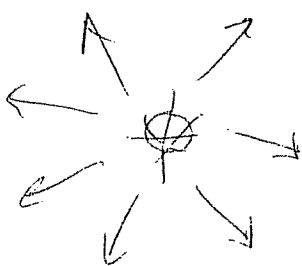
## RECYCLING PRODUCED WATER

Oil and gas drilling operators frequently drill water wells to obtain fresh water for use in drilling, fracing, and completion operations on their mineral wells. This water often is taken from the same freshwater aquifer which County residents use for drinking, livestock and other water uses.

At the same time, oil & gas operators draw tremendous amounts of lower quality water from deeply buried aquifers, and transport this 'produced' water to suitable locations for disposal.

In order to assure that levels in our freshwater aquifers are not unnecessarily depleted, it is requested that Sublette County maintain the policy position that all water used for oil & gas exploration activities be obtained from produced water sources, recognizing that treatment of produced water may be required to make it suitable for industrial use.

Susan Kramer  
1 Meadow Lane  
NVT - t



LIGHT POLLUTION @ \_\_\_\_\_



MUST GET (Buy) proper light fixtures  
TO ILLUMINATE GROUND NOT SKY.

NVT - t  
michele



To: Sublette County Commissioners  
Via Bart Meyers, County Planner

From: AL Dadka, ME/PE

307/231-1092  
PO Box 1731, Pinedale 82941  
95 Washakie Dr., Sublette Co.

7/19-20/06

Re: County Position Scoping Comments About  
Public Lands Management Practices

Ideas I've had and made comments toward BLM and US Forest Service Resource Management Plans (to be amended) are included below.

\* FS/RMP: Forest fires, Bugs (Pine Beetles, Parasitic Insects, etc.), Diseases:

- These and other such causes of timber resource Waste should be fought and controlled everywhere, whether wilderness or not, regardless of human or "natural" events/sources. It seems that the common FS excuse that it's a "natural" event and "let it burn" practices allows such Waste to occur and displaces the FS's standard charge to Preserve, Protect, and Conserve "our" forests. If wilderness laws/rules and FS management practices prevents fighting/controlling against such Waste, then these laws/rules/practices need to be changed to prevent such Waste in all cases regardless of where and should be initiated by the managing agency (Forest Service, Dept. of Agriculture, et al); let's be practical and realistic folks. If not prevented and if allowed to continue, then the forests should be lumbered out (even clear-cut?) — "our" nation has a shortage of good northern lumber and "worm-wood" brings premium prices!
- Also related to preventing Waste of timber resources, scorched standing timber and blowdowns as have occurred should be Lumbered/salvaged before rot/Waste regardless of where (wilderness or not).
- Furthermore, roadways should only be constructed where/when a true need for such exists/occurs, such as those purposes hereinafore, and others (includes recreation); and such roads should then remain for FS/public uses and not be destroyed. Also, FS should themselves develop appropriate two-track trails wherever such will serve such needs, rather than constructing roads and not everyone walks or has horses).
- Regarding oil/gas leasing and drilling and any related production activities, such practices should be strictly limited to areas where other sorts of development exists, whether similar (industrial, etc.) or different (business, recreation areas, tourist facilities, etc.); and/or in foothill/frontal ranges, but not inside the general forest lands whether roaded/trailed/roadless and definitely not "back country" or wilderness areas nor residential subdivision type areas that exist.

\* BLM/RMP: Surface drilling density/disturbances/production/emission/rehab-remedial and split-estate activities:

- Because directional drilling and centralized facilities with related technologies and improvements allow fewer surface locations and more efficient operations, along with advanced reservoir engineering technologies and instrumentation that are available to better define fluids production characters/parameters from wells/reservoirs, including improved equipment applications, the BLM should strictly limit surface locations to the minimum number each with maximum wells drilled directionally; with well depths and geological structures like Jonah and Pinedale Anticline, wells can easily be kicked 1/2 to 3/4 mile (or more) horizontally from surface locations. Also for this reason, buffer zones of 1-mile (or more) should be required near townsites, residential properties/subdivisions, wherein no drilling/production activity on the surface should occur.
- BLM is also charged with care/conservation of "our" surface and mineral resources, and such drilling/production regulation should require leasees/operators to prove by technologies to BLM, in conjunction/addition to Wyo. O/G Commission, that more wells/locations are necessary (not just acceleration) and should require that all applicable best available technology and equipment be utilized for these activities.
- BLM should also directly implement/require that all leasees/operators comply with Wyoming DEQ requirements (Wyo. DEQ was granted primacy by Federal EPA and thus acts as agents of Fed. EPA); therefore, also honoring Wyo. law on Federal public lands.
- Finally, Wyo. Split-Estate surface laws should be implemented/required by BLM of their mineral leasees/operators, rather than current BLM practice to ignore such Wyo. law. Similarly, BLM should comply with Wyo. Game/Fish requirements and work together therewith/in-conjunction towards common conservation/mitigation measures.
- Offsite remedial projects are a buy-off and should not replace on-site rehab's.

- \* "Our" Nations energy/mineral needs are very important, BUT same is true for responsible conservation of "our" resources and protection of "our" private property and equal rights under "our" laws. Many more details/comments could be included herein and above, but such would not become "concise" as requested for these general comments/ideas and minimal efforts to explain any premise/basis therefor. A few other considerations follow.
- \* BLM/Green River - Warren Bridge Recreation Area Campsites:
  - Campsites #1 and #2 to #3 areas (or further north) are too close to rural residences/subdivisions with houses where people live full time within  $\frac{1}{4}$  to  $\frac{3}{8}$  mile and more away. Many people in various size groups from various distances/states day-trip and camp for days in these areas along the river, sometimes entering in darkness when they cannot observe surroundings (even if they thought to look around!), and fire/shoot weapons of various calibers often firing towards such homes without knowing this danger when down in the canyon (they can't control ricochettes and in heat of a hunt - antelope and deer and gamebirds - don't know there are homes just over the river ridge and other hills).
  - BLM should prevent and not allow firing weapons, or fireworks as also occurs (fire hazards downwind across river), at least not allow shooting until camp #3 or further north and west until the base of Aspen Ridge (on the east side) or further west, putting at least 2 miles from the residence/ranch/subdivision areas. I've confronted some idiots!
- \* Wyo. Water Development Commission / US Corps of Engineers / US Bureau of Reclamation Dam Reservation Area on Green River above Warren Bridge (from Sec. 9-35N-11W up river about 5-6 miles thru Sec. 27-36N-11W):
  - US Bureau Reclamation has retained a hydroelectric/irrigation dam reserve over the years in this river canyon area (as located hereinabove) including lands in several non-contiguous sections up river too. WWDC has considered this area and has concerns (based on a Colorado consultant) about the utility/need of a hydroelectric/irrigation project and are giving preference (from consultant) to several small drainages downstream in the Big Piney and Boulder areas; But the higher up river and the larger quantity of water/rate will serve a larger area (needs equals and/or pipelines of course, but pumping back up river from downstream will require more!). I know rancher Dan Budd (former Wyo. legislator?) and others in south county, Canyon Canal Inc. Directors and ranchers (Jim Hinderliter, Bob Beard, Richard ?) et al, and various other irrigation districts and ranchers downstream to Fontenelle Reservoir indicated interests in the higher Green River - Warren Bridge area at the WWDC meeting last August '05. Also, not long ago, Pinedale town officers had considered reactivating hydroelectric generation on Pine Creek! However, the higher/larger Green River water resource potential of such a reservoir/canal/pipeline project(s) and power resource potential would serve a larger populace/area/need (WWDC said Fontenelle was mislocated).
  - Before Arizona/California/etal confiscate Wyo. Green River water, I believe WWDC/US Corps Engineers should investigate structural land integrity (another of consultants comments) of several narrow canyon areas just above the bridge which may have capability to "keyway" a dam into the hillsides. WWDC should reconsider this large potential!
  - There will also be tourist/recreational potentials for Sublette County, being on a main highway to Teton/Yellowstone/Jackson areas. Considering all positions/potentials above, Wyo. and Sublette County has the money-honey and the stroke to get it done!
  - Furthermore, above this Bureau Rec. Reserve at least to the "Place" and area residences (about another 8-10 miles to about N.  $\frac{1}{2}$  Sec. 25-37N-11W & then to forest boundary in Sec. 26-38N-11W) and thence to Green River Lakes, all or parts of the Green River should become a Designated Wild (parts sure are) and Scenic (all is) River; maybe even below Warren Bridge as applicable. In addition, several miles and more east/south, the New Fork River picks up many drainages and enters the Green near Big Piney, which New Fork may also qualify (parts/all) as Wild & Scenic too.
- \* Distribution of Sublette County final Position Statement should be made to Fed. Agencies (named herein, et al), State Agencies (WDEQ, WGF, WWDC, WOGC, et al), Wyo. Governor and/or related legislators/commissions, Wyo. US Congress Persons (House/Senate), maybe US Dept. of Interior and Dept. Agriculture, et al.
- \* More could be said, but maybe others will! Thx & Sincerely, AL Radtke

To: Planning and Zoning

Re: Scoping statement with regard to Sublette County's position with government agencies

From: Jill Tegeler, Broker, Allen Agency Real Estate since 1975.

The following are various statements from the Sublette County Comprehensive Plan that I helped form for three years from 1999 to 2001. These I consider Important:

Inter-jurisdictional Coordination and Cooperation:

- a. County Policy: Coordinate and cooperate with other local, state, and federal entities and interest to pursue mutually beneficial land use planning and development issues and opportunities.

Philosophy in regard to Natural Hazards/Environmental Considerations:

County Policy: Consider site-specific environmental features as part of land use planning decisions and in the review of development proposals. Factors to consider include, but are not limited to, the following:

- 1 natural hazards
- 2 topography
- 3 soil types
- 4 wildlife habitat and migration routes
- 5 municipal watersheds
- 6 riparian area
- 7 wetlands
- 8 depth to water table
- 9 surface drainage patterns
- 10 groundwater recharge
- 11 quantity and quality of surface and underground water resources

The following sections of the Plan address our governmental neighbors at almost each point, so please look at the sections entitled:

Recreation

Natural Environment/Cultural Resources

Air Quality and Resource Development

Water Resource Development

Oil and Gas Development

Wildlife Resources

Forest/Timber Resources

Public Lands and Resources

Thank you for examining the work of at least sixty or more county residents who worked on this plan.

*Jill Fegler*  
7-19-06

To: Sublette County Commissioners  
Sublette County Planner

From: Phil and Patty Washburn  
P.O. Box 988  
Pinedale, WY 82941  
307 367 6456

The following thoughts – in outline format – are submitted in conjunction with the initiative to establish a Sublette County Policy for Public Lands.

1) Given the economic and political power and resources concentrated in the energy firms operating in Sublette County, the County's only useful role in public land decisions is one of guarding the residents and resources from the abuse of this power. This is particularly true during a period when Federal policy so overwhelmingly favors aggressive energy development--even at the expense of our environmental protections.

Other than providing the "normal" County services to which the energy operators are entitled, the County should take no positions that could be construed as facilitating further natural gas development. This would simply make an already unbalanced situation worse.

2) With respect to the impacts of the Jonah and Pinedale Anticline drilling, the County should, at this point, concentrate its influence on the issue of air quality. More than any other threat posed by the drilling, the degradation of the air quality has the most serious long-term affect. The splintered responsibility for maintaining air quality (i.e. BLM's responsibility for permitting and the Wyoming DEQ's responsibility for monitoring) leaves us especially vulnerable to substantial further degradation. The County should spend the money necessary to collect objective "science" and insist on being a party to all decisions regarding air quality. Further, the County should insist that the BLM's permitting decisions are forward-looking and based on scientifically sound assessments of cumulative impacts from all anticipated drilling.

3) Sublette County should take an active and leading stand in opposition to further drilling and leasing in the Wyoming Range. The basis for this stand should be the "balanced use" mandate that the BLM and Forest Service are required to achieve. Given the truly monumental impacts of the Jonah and Pinedale Anticline drilling, the County should aggressively insist that the only reasonable interpretation and application of the "balanced use" mandate would preclude the spread of drilling in the Wyoming Range.

## National Forest Policy

Scenic vistas should be preserved and not compromised.

Clean air is important. No one wants to visit a place that is as polluted or more polluted than the place they came from. I believe air quality should be monitored immediately by some agency not connected or beholden to industry. Air quality has declined visibly in the last 5 years. We should be working to improve air quality and visibility.

Water sources should be vigorously protected from all sources of pollution. I.E. acid rain, agricultural by-products (such as fertilizer runoff and livestock erosion), any kind of industrial pollution or run off, litter, outboard motor or snowmobile leaks, & human waste, for example people urinating on frozen lakes. Underground aquifers should not be compromised in any way. No unwanted products should be introduced into aquifers or ground water if at all possible.

I believe in the concept of multiple use of our forest lands but I do not believe that any one use should be allowed so as to essentially preclude or restrict others from enjoying the forest. One example I can offer here is oil and gas production. I have seen some well reclaimed oil well sites but gas fields are far more destructive to surface area because of the associated roads. Therefore I believe that all oil and gas leasing be stopped now and not allowed in the future on any forest land. All existing roads developed for these purposes should be closed and reclaimed. This work should be paid for by the industry involved.

Migration corridors for wild animals should be protected or even expanded where possible. We humans continue our sprawl and we are continually degrading this jewel that we have here in Wyoming. We should be protecting that which we like about living here and making provisions for future generations to enjoy it also. Wyoming has an opportunity now to establish a National Migration corridor for antelope. I believe we should do everything possible now to protect that historical passage. We were the first for National Parks, National Monuments, and women's suffrage, why not a National Migration Corridor?

I don't believe the government should be selling our public lands for any reason, let alone to try to balance a runaway budget deficit brought on by irresponsible spending.

Wilderness area with all the protections and restrictions are important to maintain and maybe even add to.

I believe commercial outfitters, such as float fishing, atv touring, and snowmobile touring should be limited to bare minimum. These activities seem to create conflict with others trying to enjoy the peace and quiet the forest has to offer.

There should be no development of under surface elements at all. No directional drilling for anything under forest lands.

No trying to tap any geothermal sources or aquifers under forest lands.

Wolves and bears should be allowed to exist on and use our forest lands. Of course there should be provisions placed on that use. Those provisions are beyond the scope of this letter.

Many road on forest lands could be reclaimed or closed. Quite often these roads are redundant anyway as there is usually another road close by that goes the same place with no more travel involved. More roads brings more abuse of the land.

Studies have shown that elk, deer, and antelope are all displaced by new roads and the human activity that comes with them.

ATV's have become a menace to our public lands. I have seen many more irresponsible riders than responsible ones. The Forest Service seems to be allowing this by effectively ignoring the problem. They put up signs that people ignore but I have yet to see any Forest Personnel enforcing road closures or off trail riding by speaking to ATV riders. Springtime antler hunters and hunting season riders are especially flagrant in their disregard of trail riding and yet the Forest Service is never around to witness any of these violations. They know it is happening, when it is happening, & where it is happening but do nothing about it.

Hunting, fishing, camping, hiking, and horse back riding are all legitimate uses of forest land and those activities, enjoyed by many, should not be seriously compromised or precluded by any activity that is driven by money.

- Maybe that is enough for now. Thank you for your time. Friday, July 14, 2006

Lanie Beebe  
P.O.Box 500  
Bondurant, Wyoming 82922

July 11, 2006

In my estimation it is critically important that Sublette County makes a viable plan. Where do we want to be in ten years time? Where do we want to be in twenty years time? Without careful planning now the things so many of us value here will be gone. The county is going from an agricultural base to an industrial base with great rapidity.

Our three greatest resources are CLEAN AIR, CLEAN WATER and OUR CHILDREN. We need to think of the FUTURE and realise that careless decisions made today will have a lasting impact on that which is our LEGACY. How will you answer your grandchildren when they ask you, tell us of the good old days of the herds of deer and antelope, of hunting in the mountains for elk and moose, of fishing in clean streams and creeks? Tell us of the days when the city of Pinedale could still drink the water out of Fremont Lake and see the mountains from the valley floor? Tell us of the days before ACID SNOW killed the mountain lakes and melted the glaciers that had been there for millenium? Of course your grandchildren would be visiting from elsewhere as they could not afford to live here.

I want to make it EXTREMELY CLEAR that I am not opposed to mineral development. Historically the state of Wyoming has always had strong mineral development and this is both good and important to both the state and the nation. We now possess technology to extract minerals in a more efficient and prudent manner. This is VERY POSITIVE!!! What is disconcerting is that Federal Agencies are not paying attention to LOCAL COMMENTS and LOCAL ISSUES. For example, is Sublette County to become completely industrialised??? Or is Sublette County going to be able to assert itself and maintain it's INTEGRITY??? There needs to be HARMONY not DISCORD. People need to come together as COMMUNITY to solve COMMON PROBLEMS. People need to hold elected officials accountable for that is what a democracy is. However it is important for the people to work together to solve problems and not be pitted against one another to sell newspapers or promote discord to usher in unwanted and hurtful adendas.

I suggest the following things. First that the drilling for gas stop at the boundaries of the Bridger Teton National Forest. This will protect the INVALUABLE WATERSHED of the Hoback River which is a major drainage of the American West. That the Wyoming Range be preserved as it is for the multiple use of hunting, fishing, snowmobiling, and back- country skiing and hiking. That game animals be carefully monitored so their numbers flourish and do not diminish. That historical sites be preserved. That ranchers and outfitters be protected so they can maintain their livelihoods. That industry use the best technology they possess to extract the minerals. And that the state create a new agency to monitor mineral extraction and impacts on local infrastructure, local population, flora, fauna water and air and that citizens participate with this agency to insure that we protect what is so dear to us.

Wyoming is as America once was!!!! Let us work together to insure that we protect our LEGACY!!!

Respectfully submitted,  
Lanie Beebe



Linda J. Cooper  
 SDSBT  
 (Stop Drilling Save the Bridger Teton)  
 P.O. Box 121  
 Bondurant, WY 82922

Dear Commissioners,

I just learned of the open meeting tomorrow the 11 of July. With only one days' notice and another obligation I am not able to attend. It is good that you are having this opportunity for Sublette County residents to voice their concerns about energy development in this County. I will be blunt. You have neither been listening nor leading.

I have long since concluded that for the BLM, Sublette County is the "sweet spot." Anything they want they can get and there will be no objections from the County. As long as that cash cow keeps the dollars flowing so another pool or whatever can be built, its ok! Perhaps now energy development is over-the-top, and people are waking up; the Commissioners are the last to figure out that this may be "too much of a good thing."

SDSBT was created October 25, 2005 at Hoback Ranches after the BLM announced their approval of the South Rim Unit that includes 19,400 acres, 50% BTNF land and 50% Hoback Ranches land. The group is now nearly 500 and has members from Pinedale, Merna, Daniel, Bondurant, Hoback Junction, Jackson and elsewhere. We are water poor, wildlife rich, and scenically well endowed; we vehemently oppose the three proposed wells on the BTNF; oppose the industrial corridor that is in effect the result of the BLM ramped up lease sales since Beaver Creek last December and up through the most recent last month. Where has the County been in understanding our point of view? Where is the County in supporting the protection of the Wyoming Range? Where is the County in supporting its communities? The County has a policy of one size fits all and that is a wrong policy. We want recreational, wildlife rich and healthy forested public lands.

The northern part of this County is agricultural, and residential. It is not industrial. It has no infrastructure to support energy development; it is wildlife oriented and recreational. The County has done nothing to evaluate where it is appropriate to develop energy and where it is not. The County has not engaged with BLM except to say "no problem here." The County has an implicit policy of drilling any where, anytime, under any circumstances and it is greed at its most flagrant. We want scenic and recreational values to be sustained. We do not live here because it is industrial rather we want our private lands not to just survive despite energy development, but to be recognized for its values.

The Jonah Field and the Pinedale Anticline are prime examples of energy development without restraint. The decrease in air quality is obvious. The impact on mule deer as a result of drilling in their wintering grounds is documented. One doesn't have to be an air pollution specialist or a wildlife biologist to figure out that what was once pristine and abundant is no longer. Pinedale used to be known as a recreational small, high value community. No longer. Energy development has run amuck and you are not listening!

By developing our vast wind and solar energy resources we can help solve our nation's energy problems without sacrificing our most sensitive public lands and natural treasures for a short-term, limited supply of natural gas.

Sublette County should develop and sell its extra wind power to states like Colorado, Arizona, New Mexico, Nevada, California and Montana, whose voters have decided to buy more power from renewable resources, and are among the largest energy consumers in the West.

Thank you for your consideration of these comments.

Representing the Upper Green River Valley Coalition, a Sublette-County based conservation organization with over 380 local and seasonally-local members.

Yours Sincerely,

/s/

Linda F. Baker

Community Organizer

(And)

Ted Porwoll

Karen Rogers

Fran Chilcote

Ed Chilcote

Ron Chilcote

NEW FORK SOCIAL CLUB LANDOWNERS

DAN FARRAND

Nora Farrand

KURT DURRANT

PIYAPHAN DURRANT

Received  
1/25/04

Bob McCarty  
Box 424, Pinedale  
360-6811

1/25/04

Bart R. Mayers  
Sublette County Planner

Dear John, Bart and Dave:

Thank you for the opportunity to comment on the "addendum or amendment" to the County Comprehensive Plan. This is a bold move. John, I hope Bill and Betty don't veto your efforts again.

I have lived in Sublette County for over 20 years and have worked with John Linn on various projects during that time. He served on the Big Piney/LaBarge Working Group when I was the BLM Wildlife Biologist and Chairman of that group. I know BLM politics very well, having worked for them for 21 years.

My major concern is the effect that BLM (and Forest Service) decisions have on local communities and our future. I have three 15 year old children who will witness these impacts long after I'm gone. The BLM typically gives preference to individual communities during BLM and EIS processes. County commissioners' involvement is good or different. Local Range directors do not consider local elected officials' opinions and representatives are community advisors on many issues, especially in planning of that community's success. Perhaps we need to re-examine that wheel.

## Socio Economics

The BLM has never adequately evaluated the socio-economic disasters associated with their management decisions. They usually contract that job out to some outside the county (often state) consultant, and pay them well for the garbage they produce. Livestock grazing, road (or roadless), wild horse, and minerals leasing decisions are often dictated from State or Washington Offices with little regard to the impact on local citizens.

The influx of Texans, Oklahomans, Louisianans, Alabamians etc. into ~~at~~ our county is a direct result of BLM Pinedale, Johna and Pinedale Anticline decisions. The natural gas has been in place for millions of years, why capture it all in a few decades. I have a number of friends who work in the well field who will become jobless once the majors extract all the gas. They ask me the same question: "why not slow down and make it last?"

My property taxes have tripled in the last 5 to 10 years. I don't want to sell and leave, but if I do there are plenty of real estate people willing to buy my property. They will probably leave when the gas play is better somewhere else, and the county will not benefit from my improvements any more. If make \$1200/hour, what are the chances of a decent wage? That's how much I make at

the end of each month just paying for food, gas and taxes.

My subdivision was a quiet peaceful environment until 2 or 3 years ago. Now people drive 60 mph down wash-boarded dirt roads that should have a 25 mph speed limit. The deputies that live here would like to enforce speeding laws, but there are none, as the county will not adopt our roads. We breath volumes of dust daily. We remove our snow with 4-wheelers and pickups during winter. We live directly downwind from the well field and breath their particulates and ozone.

You won't find these impacts in any BCR document, but they are real. If we could slow this train down it would help. The county could help, but Bill and Betty don't want to. How about you John?

We need more deputies. I never thought I'd say that but now I believe it. I risk my children's life (and mine) daily on State Highway 191 going to school and work. It gets really bad in winter when the roads are slick. Deers are hit daily. More about that later. The school crossings on Pine Street are ~~extremely~~ death zones. There always used to be a deputy there, now it's never there.

It's not good business to buy deputies housing, it's not protect our own people from the job. Then make the relocation on

get BLM's enforcement people up here, they are deputized I believe.

I feel for the people on Tyler Street and those that bought expensive lots along the Mesa Road. They deal with the dust and speeders too, in an area that was once peaceful. Now their houses are lit up by 24-7 drill rigs just outside their front door. What about the views and promises in BLM's EIS?

The BLM should be held accountable for the socio-economic disaster they created. Our wildlife, air, and quality of life deteriorates more every year. Now 100 rooms in town will be dedicated to Halibuton employees (very well behaved they say). Traffic loads will increase on 191 and Tyler. School crossings will become even more hazardous as the "get 'er done and hurry up to work" philosophy prevails.

Let's slow it down. Please encourage BLM to limit rig numbers and pay attention to APP (Drilling Permits) in sensitive areas. Cluster more rigs and directional drilling pads. Boss employees to John and Julie line of movement, not just in winter (which isn't really being done either). Cut down on the traffic, dust, and out of state people. Make this boom last as long as we can, but at a more acceptable level of disruption to our lives and economies. Local businesses can even find work on it.

The issue is no longer one of creating jobs for locals, the market is saturated.

The oil and gas industry is importing hundreds of workers from out of state and even out of the country. There is no housing for these people, so man camps are created. Man camps bring with them a whole host of problems (drugs, crime, violence, etc). Whenever a man camp is authorized, they should be required to provide their own security police. We simply don't have enough deputies, EMT's, or sanitation to provide for them.

## Wildlife Habitat

I have witnessed a constant deterioration ~~in~~ in the quantity and quality of wildlife habitat over the past 20 years. Even the Wyoming Game and Fish Department won't recognize this (politics). Our sage grouse and mule deer do.

There is much ado about Pronghorn, but pronghorn thrive on disturbed areas and water. We have plenty of that in the well field. What pronghorn don't like is subdivisions. Dogs, fences, and guns have affected pronghorn more than gas wells.

Mule deer winter range and sage grouse nesting are the issues at hand. Although we have lost deer, the population is still over-eating its food supply during winter. Sagebrush (Wyoming sage) is their staple with Mountain Mahogany, saltbush and winter-fat being ice cream. Most of these plants are overgrazed on deer winter ranges. They have been for years.

Mule deer also eat some grass, when it is green. That's part of the reason so many are hit by vehicles on our highways. They ~~also~~ like the extra heat created by black-topped roads, which implies snow melt and resultant winter green-up of grasses along highways. They appear oblivious to humans and cars, given the abundant protein supplied by reclamation along highways.

Mule deer are ~~not~~ sensitive to disturbance, both winter and summer range. They can become habituated to disturbance.



but generally avoid disturbance from humans, coyotes (dogs) and other predators. They typically flee until they feel they have reached a ~~Safe~~ "Safety Zone". Sometimes this is a short distance.

Deer learn to recognize non-threatening ~~intrusions~~ intrusions. I have witnessed many mule deer pay my little or no attention to my BLM pickup on well travelled roads during winter, so long as I did not stop. Mule deer have grazed in my front yard with my dog and ~~me~~ I present on the porch, but we presented no threat, nor did we make loud noises, move quickly or shoot at them. Deer (and all big game) seem to know when the hunting season starts (gunfire) and ends (no gunfire).

Mesa deer are different than Piney deer. Most of the mesa winter range remained undisturbed until recently (other than a few snow machines and antler gatherers). Piney deer ~~have become~~ accustomed to well field operations. Perhaps the Mesa deer will too, but it will take a while.

The BLM has mandates to manage and improve wild life habitat. They have done nothing in Pinedale since about 1977. Instead, they have willingly sacrificed wild life habitat to oil and gas development. Even their own biologists will tell you this (in secret).

Some groups have been in trouble since the 1950s. They need vegetative cover to protect their ground nests. Coyotes, fox, and badgers are also a problem.



Winter operations are increasing in the wellfield. The mere maintenance of existing wells adds to the stress on wintering wildlife. Now BCM is considering dropping all winter, nesting and fawning restrictions. We already know that deer have either left or died as a result of winter operations on the Mesa (4/3% I believe). This study was funded, reviewed and authorized by oil and gas operators.

There is an established system in the BCM RMP and the Big Piney/Kaibito Coordinated Activity Plan to determine when winter drilling/completions is appropriate. Maybe BCM hasn't read these documents. Most of the people there now weren't in Pinedale when the RMP and CAP were written. Bill Canning knows the procedure.

Dropping all winter restrictions removes a very important ~~safety~~ safety net for deer. Winter operations are appropriate in areas of low deer density; during mild winters when forage is abundant; early in the winter (Nov. 15 - Dec 15) when deer are migrating to summer range (often in early March); in areas where deer have habituated to disturbance (towns, subdivisions, highways, compressor stations, etc.); Areas of high deer density should be avoided and operations should cease when (if) a severe winter hits. We lose deer even during mild winters.

## Mitigation

I agree that a county official should be present during mitigation decisions. Off site mitigation will do little for our suffering wildlife. Money should not leave Sublette County. Mitigation dollars should be spent exclusively on Habitat Improvements, not monitoring. Air quality stations, GPS collars and computers, pick-up trucks and more personnel will not help mitigate anything.

In the late 1980's and 1990's BLM had a very active habitat improvement program. The RMP, Upper Green River Habitat Management Plan, and a few allotment management plans set the stage for prescribed burning, chaining, herbicide application, and other projects. These areas should be visited to determine the success of these treatments.

Proper reclamation is key to mitigating habitat loss. Nobody seems to know how to grow sagebrush (except Mother Nature). It can be done. In a perfect scenario, habitat reclamation should equal habitat disturbance. Reclaim as well (successfully with native species) before you drill a new one. This rule alone would help solve many of the problems we are experiencing. There are professionals out there who know how to reclaim disturbed areas. Encourage contracted and short-term

are needed. Children are taught to clean up their mess before they make a new one. It's a good rule.

Before any habitat improvement is conducted, soil moisture should be adequate to produce desired results. Manipulating vegetation during drought is a sure fire failure, ask any farmer who survived the "Dust Bowl" years. BLM used to know how to improve habitat, and probably still could if they would allow their professional in the field rather than producing drilling permits. Face it, the Johra and Anticline combined will not quench this nation's thirst for oil and gas. We need to take care of our back yard and BLM needs to remember its multiple use mandate.

Throwing money into a pot with no plan on where or how to spend it is risky at best. Mitigation money should be spent on well planned and executed projects. There are many examples of good money being spent frivolously and reaping no rewards. All money should be spent on the ground, not to hire more administrators.

# AIR

My daughter, in all her 15 year old innocence, conducted a scientific study at OZONE levels around town. Her studies prompted D & Q (and Perry Walker) to worry. I am very proud of her.

The air that we breath is being polluted by Johna and the Anticline. We know that. So what do we do?

There are best management practices. Encana and Questar knows. They are working toward clean air. Make Shell and Ultra do the same. Clean air is our legacy. Some bad air comes in from Salt Lake, L.A., Japan etc. but most of it is made right here in Sublette County.

Air quality monitoring stations surround the well field, but none occur in the area directly affected by drilling. My daughter's results showed levels far exceeding standards near Questar wind drilling rigs. Why do we measure air quality miles away from drill sites?

The D & Q should be advised to measure air quality in the well field as well as miles away from it. The results could be revealing. Only a fool would cook their hot dog in the fat when the campfire is twenty feet away.

## Summary

I have provided you with several thoughtful recommendations, and personal observations. I hope they are useful. The BCM is mandated to maintain and improve wildlife habitat in the Wildlife Manuals (6600 I believe). I have written several management plans using the guidelines. It can be done, but isn't.

Socioeconomics consists of more than creating jobs for a transient work force. This County is no longer the peaceful place it was 5 years ago (even though it was sometimes not so peaceful: Kathy David). I don't go out much at night anymore and my daughter (15) has already experienced what it means to be stalked at her job in Faler's grocery store. I don't recall reading about any of that in BCM EISs.

I am doing what I can, including running for county commissioner. I'm not doing that because I enjoy meetings or being chastized by the media. I am running because I believe the Sublette County Commission can help our citizens and wild places survive this boom.

Thank you John Linn for providing this opportunity for public input. I hope you use it wisely.

Your friend,

Bob McCarty