

## TRANSMITTAL NOTE

March 24, 2008

Attached please find a letter requesting that a Health Impact Assessment (HIA) be completed and incorporated in the PAPA Revised Environmental Impact Statement currently in preparation.

This letter is being faxed to you now in order that it be timely. The hard copy of the letter along with additional signatures will be mailed in the near future.

Governor Dave Freudenthal  
State Capitol Building  
200 West 24th Street  
Cheyenne, WY 82002-0010

Mr. Robert A. Bennett  
State Director  
Bureau of Land Management  
Wyoming State Office  
5353 Yellowstone Road  
Cheyenne, WY 82009

Mr. Andrew Dannenberg  
Associate Director for Science  
Centers for Disease Control  
Mail Stop F60  
Chamblee, GA 30341

Mr. Robert E. Roberts  
Regional Administrator  
EPA Region 8  
1595 Wynkoop Street  
Denver, CO 80202

Dr. Brent D. Sherard, Director  
Wyoming Department of Health  
401 Hathaway Building  
Cheyenne, WY 82002

Mr. John Corra, Director  
Wyoming Department of  
Environmental Quality  
122 West 25th St.  
Herschler Building-4th Floor  
Cheyenne, WY 82002

Mr. Jeroen van der Veer, CEO  
Shell Oil Company  
P.O. Box 2463  
Houston, TX 77252

Mr. Michael D. Watford, CEO  
Ultra Petroleum Corp.  
363 North Sam Houston Pkwy E,  
Suite 1200  
Houston, TX 77060

Mr. Randy Eresman, CEO  
Encana Corporation  
1800, 855 - 2nd Street SW  
P.O. Box 2850 Calgary, AB T2P  
2S5

Mr. Keith Rattie, CEO  
Questar Corporation  
180 East 100 South  
P.O. Box 45433  
Salt Lake City, UT 84145-0433

Tony Hayward, CEO  
BP Amoco  
501 Westlake Park Boulevard  
Houston  
TX 77079

**March 22, 2008**

**Re: Request for Human Health Impact Assessment**

Dear Sirs:

With growing concern surrounding human health issues in Sublette County, Wyoming, the undersigned request that a comprehensive Health Impact Assessment (HIA) be completed in conjunction with the on-going BLM Pinedale Anticline Project Area (PAPA) Supplemental Environmental Impact Statement process. The latest Draft SEIS (BLM-PFO, December 2007) did nothing to address the potential human health consequences of on-going and proposed federally permitted natural gas development activities in our county.

We are aware that the U.S. EPA gave the Pinedale Anticline Oil and Gas Development Project Revised Draft Supplemental EIS its lowest possible environmental rating, EU-3, citing concerns with elevated ozone levels, documented groundwater contamination, and visibility impacts in nearby protected federal wilderness areas. Such low rating is very rare and serves to emphasize the growing health related concerns in this area.

Most recently, the Wyoming Department of Environmental Quality issued three ambient ozone Alerts, with 8 hour averages in our county well exceeding the new 75 parts per billion National Ambient Air Quality Standard and documented at 122 ppb in some areas. It is somewhat fortuitous that this health disclosure occurred but it is also worth noting that these are the first of their kind in the history of Sublette County. Ozone is one of the key pollutants being added to our air from gas development, but only since 2005 has it been subjected to monitoring and then only in connection with Class I airshed visibility issues, i.e., the monitors were not placed for human health reasons. Ozone of course is a significant human health concern, elevating risk to children for asthma development and Chronic Obstructive Pulmonary Disease (COPD) acquisition later in life, among other negative outcomes.

However, of even greater concern than the revealed water and air pollution regulatory breaches are how many potentially un-discovered, and thus un-disclosed, human health risks exist attendant to this continuing local energy development. Health Impacts Assessments are designed to address exactly this critical knowledge gap.

Please be clear that we are not fundamentally opposed to oil and gas development in the Pinedale Anticline gas field. Energy development has flooded our county with revenue and jobs. But revenue alone does not preclude or necessarily remedy the associated impacts and pressures placed on our County and its citizens. It is therefore critical that management decisions be informed, with a full accounting made of all impacts and necessary remedies including those to human health.

We understand that the U.S. Interior Department's Mineral Management Service last year completed a public health impact assessment regarding oil and gas activities in Alaska. Also, we note and laud that the International Petroleum Industry Environmental Conservation Association has produced *A Guide to Health Impact Assessments in the Oil and Gas Industry*<sup>1</sup>, recognizing appropriate responsibility for human health in other energy development regions. Further, Shell Oil Company requires health impact assessments "prior to all new projects and major facility developments, as well as prior to the significant modification or abandonment of existing facilities."<sup>2</sup>

In conclusion, we strongly recommend that the HIA protocol utilized by the World Health Organization and U.S. Centers for Disease Control<sup>3</sup> be adhered to, in order to assure comprehensive and thorough human health impact analysis. With reference to legal interests, such analysis should fulfill the broader human health analysis and disclosure requirements of the National Environmental Protection Act and Community Right to Know Act.

As members of the community we look forward to your prompt reply and to working with you on a comprehensive health impact assessment. For further information, you may contact Carmel Kail at (307) 367-3058.

Respectfully,

Signature

Title or Affiliation

Carmel L. Kail

J. Thomas Johnston, M.D.

Sublette Co. Public  
Health Officer

Quint S. Gehlhausen, RN Sublette County Public Health  
RN.

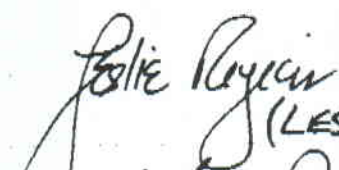
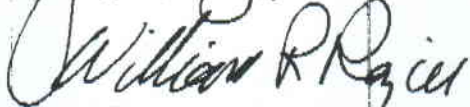
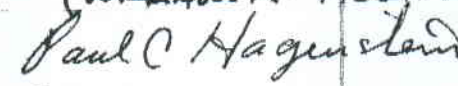

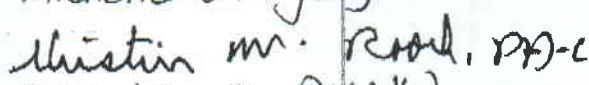

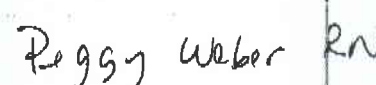

cc:

U.S. Senator John Barrasso, MD  
U.S. Senator Mike Enzi  
U.S. Centers for Disease Control, Ms. Sarah Heaton  
Sublette County Commissioners  
Town of Pinedale  
BLM Pinedale Field Office, Mr. Chuck Otto  
Upper Green River Valley Coalition

<sup>1</sup> <http://www.ipieca.org/activities/health/downloads/publications/hia.pdf>

<sup>2</sup> [http://www.shell.com:80/home/content/envirosoc-en/making\\_it\\_happen/impact\\_assessment/impact\\_assessment\\_13062007.html](http://www.shell.com:80/home/content/envirosoc-en/making_it_happen/impact_assessment/impact_assessment_13062007.html)

<sup>3</sup> <http://www.cdc.gov:80/healthyplaces/hia.htm>

Signature	Title or Affiliation
 (LESLIE ROZIER)	Family Nurse Practitioner Pinedale Medical Clinic
 (WILLIAM R. ROZIER)	Teacher, Atmospheric Scientist / Engineer
 PAUL C. HAGENSTEIN	SUBLETTE CENTER BOARD MEMBER PAWG MEMBER ADJACENT RANCHER
 michelle Overgaag	Laboratory Director Sublette County Rural Health Care District
 (Kristin m. Roornik)	Physician Assistant Sublette County Rural Health Care District
 DAVID KAPPENMAN, MD	Physician Sublette Co Rural Health Care District
 Peggy Weber RN	Registered Nurse Sublette Co. Rural Health Care District
 (Kent Van) Cynthia Van	Health Care Coalition Att. to Democratic Convention Health Care Coalition Registered Nurses



## Signature

## Title or Affiliation

*Wanda B. Skinner*

Retired - Tamarac County Commission

*Michael J. Kramer, M.D., FACEP, FAEM*

via fax - etc

Memorial Hospital Sweetwater County  
Rock Springs, WY  
St. Rose Dominican Hospital, NV  
Home owner + Resident

Sublette County, WY

Retired RN  
Home Owner/Resident.

*Jillie Land RN.*

*Paul Rock*

Chairman 30-yr. resident  
Town of Pinedale  
Planning + Zoning Comm.

Marilyn J. Hulsman

Registered Nurse  
Pinedale Wyoming

VIA PHONE MESSAGE

*Daphne D. Platts*

Sublette, County Library  
Director

*Susan Kramer*

via fax - etc

Resident, ex PAWG  
member

*Pamela Curry*

member Pinedale Planning +  
Zoning Commission

*Jane H. Johnston*

50-year resident

Signature	Title or Affiliation
Rebecca L. White (via email)	FNP-C Wyoming Native Pinedale Resident 20 yrs Bookkeeper
Jamie Kaul (via fax)	Biologist
Rollin D. Sparrowe, PhD (via fax)	M.D.
Judith M. Boyle (via email)	Concerned Citizens
Patty Kaech	Pinedale Town Council PAWG member
Nylla Kunard	P.T., ScD
Champa Smith	BLM NRS, RETIRED
Thomas A. Curry	

Signature	Title or Affiliation
Annie Sondgeroth RN	Sandwich County Public Health County Manager
Annie Sondgeroth	
Quincy R Heydt	LINCANE
Quincy R Heydt	Home Respiratory Company
Marty Crandall	Local Business Owner
Marty Crandall	