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PINEDALE BLM

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Feb. 13, 2008  
PO Box 2486  
Jackson, WY 83001Caleb Hiner  
BLM – Pinedale District  
PO Box 768  
Pinedale, WY 82941

Dear Mr. Hiner;

I am writing in response to the draft EIS for the Pinedale Anticline recognizing that the deadline for responses ended this past Tuesday. Nevertheless, I would hope my concerns will be included in the Final EIS. The period to respond was really too short for many of us.

I have attached a copy of a letter-editorial I wrote last May which pertains to the development of natural gas fields in the Upper Green River Basin. My concerns expressed in the editorial apply to the Pinedale Anticline.

Let me expand on one extremely important issue that being the possibility of nitrate deposition arising from the possible 4000 plus additional gas wells associated with the Pinedale Anticline. The fact that nitrate concentrations are recently being detected in lake waters of the Bridger Wilderness is an “early warning” sign that eutrophication is underway and acidification of these lakes is not far behind. For that reason the Final EIS should require the best available technology for emission controls, particularly NOX, on all activities within the gas field, including automotive vehicles, as well as drilling rigs. Additionally a slower pace of development would be beneficial so that less annual nitrate deposition would take place. NOX probably is responsible for the spikes in ozone which have been detected in the Pinedale area also, even more reason to control emissions as closely as possible. And there is some research to indicate that nitrate build up in the alpine soils may be decreasing the amount of selenium available for grazing animals such as the bighorn sheep and the picas. Hopefully the above is sufficient to stress the urgency of protecting the air quality in the Bridger Wilderness. The reduction of visibility in the Bridger Wilderness is a separate but related issue justifying improved emission controls from the gas fields.

Thank you for hearing my deep concerns.

  
Alan F. Galbraith

AQ-1

AQ-2

AQ-3

I-3-1

# Don't forget wilderness air, wildlife

The following was written to U.S. Sen. Craig Thomas - Eds.

I am writing to express my deep concern for the impacts of the gas fields development in the Upper Green River basin.

Let me introduce my professional interest. From 1982 until my retirement in 1998 from the U.S. Forest Service, I was responsible for the initiation and management of a pilot program for the Forest Service to monitor potential impacts to air-quality-related values in the Class I Bridger Wilderness Area, which covers the western slope of the Wind River Mountains. Our monitoring program was founded upon the strategy of "early warning detection." Simply stated, if any of several key indicators we were monitoring began to change (deteriorate), then that would be a signal before severe damage took place in the highly vulnerable lakes and streams of the Bridger Wilderness.

The reason for establishing this monitoring program was the growing concern that industrial air pollution from both southwest Wyoming and interstate sources might become a problem. Our initial findings from lichen analysis and lake bed samples showed that in fact industrial air pollution had been occurring for some time, possibly as early as the turn of the 20th century. But our key monitoring indicators did not suggest any significant damage had taken place despite the fact that acid rain and certain industrial pollutants were detected annually.

Since that time, approximately 1982-1987, three of the key indicators have changed adversely. These indicators are visibility, acid neutralizing capacity of some of the lakes, and the nitrate content of certain lakes. Additionally, from other monitoring conducted in the area, ozone has been detected at rather high concentrations. What is alarming to me is the present Jonah and Pinedale Anticline gas field development. Any increase in air pollution from these fields in the planning stage in the Rock Springs to Baggs area has the potential of adding even more air pollution to the lake and streams of the Bridger Wilderness. The more recent decrease in acid-neutralizing capacity, coupled with the increase in lake nitrate is an even more serious alarm bell since it heralds a probable acidification of the lakes with increasing air pollution.

In addition to these potential impacts to the Bridger Wilderness lake system, I have more recently become aware of the threats to critical wildlife winter ranges and

development. With the projected development of the Jonah and Pinedale Anticline fields alone, it appears the impacts to the mule deer, moose, sage grouse and antelope populations is not a question of whether they will occur but how much. Because of both the wildlife and air-quality concerns, I would make the following recommendations:

- That you and the Wyoming congressional delegation insist that the Bureau of Land Management mandate the latest and best available emission controls be applied to the existing and future field operations. This is particularly important for the control of nitrogen oxides emissions. Retrofitting of existing facilities should be required if not up to these standards. I realize that the state of Wyoming Department of Environmental Quality Air Quality Division needs to be on board with this recommendation.

- That in critical wildlife ranges, wintertime activities in the gas fields be limited only to that minimum amount to keep existing facilities operational. This restriction would apply to future drilling activities, as well.

- That further development of the gas fields awaits the completion and adequate environmental review of the Pinedale Resource Management Plan, BLM.

- Finally, that you lead the Wyoming congressional delegation in proposing that certain federal lands in the Upper Green River basin be permanently withdrawn from oil and gas leasing. A precedent for such a withdrawal has taken place recently by the action of the Montana congressional delegation. Such key areas could be the Wind River Mountain's front land, that being below the wilderness boundary. There are also selected areas along the flanks of the Wyoming Range that should be withdrawn. The Upper Green River Valley Coalition has identified these areas in more details as having significant wildlife benefits.

I feel confident you share my concern about the long range and irreversible consequences of the gas field development. During my 32 years as a Wyoming resident, this is the most severe threat to critical natural resources I have seen. I say this recognizing the major importance of natural gas development as a source of cleaner energy for our nation. What is needed, therefore, is a most carefully controlled development of the gas fields to ensure that impacts to wildlife and air resources are kept to an absolute minimum.

Thank you for listening to my heartfelt concerns.

*Alan F. Galbraith is a Jackson resident whose career was*



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