March 6, 2011

Supervisor Jacqueline Buchanan
Bridger-Teton National Forest
PO Box 1888
Jackson, WY 83001

Re: Eagle Prospect and Noble Basin MDP DEIS

Dear Ms. Buchanan,

I realize the dilemma that presents itself with the proposed approval or disapproval of the drilling alternatives for natural gas in the Wyoming Range. The State of Wyoming, because it is rich in natural resources, has the moral responsibility to manage the development of these resources in an environmentally sound manner. Ideally, the politics of developing any proposed area should be put aside until all of the alternatives have been analyzed. As a long time resident in this State, I am disheartened by the lack of environmental controls placed on all of the companies in the gas extraction industry. The Jonah and Pinedale Anticline Gas fields should be evidence of this. Sublette County, once able to claim having the cleanest air and water in the Country can now claim the highest ozone exceedances in the Country. Using natural gas for heating homes and powering vehicles is beneficial however drilling for natural gas is environmentally harmful. The world needs this resource. Wyoming should be a leader in clean production of this resource. Before one hole is drilled, I believe the following safeguards if not more should be taken:

1. Base line air, water and wildlife data should be collected. This was not done in the Jonah or Pinedale Anticline Field. Very conveniently, when questions arose and it was determined if something was truly an impact, baseline data was not there.
2. The impacts that have already resulted in Sublette County should be taken into account. As mentioned, the air in Sublette County when ozone conditions are ideal is a detriment to the health of all humans and wildlife. Tracking the wind direction when recent ozone exceedances in Sublette County have occurred has been prominently from the South. Daniel and the Wyoming Range monitors both recorded high ozone readings. This is not acceptable. There should be no winter drilling.
3. The deer in the Wyoming Range migrate to the Anticline to “winter” and give birth in the spring, before summering in the Wyoming Range. Opposition to drilling in the Anticline was quickly buried as the obvious financial benefits outweighed any environmental concerns. The number of deer in Sublette County has been reduced to dangerous levels. The lesson learned: You cannot displace wildlife and expect them not to decline.
4. From the beginning, all of the equipment used must be Tier II compliant or greater. Fugitive emissions from pipelines and other sources will not be allowed. Consider using electricity to power the compressors rather than diesel or natural gas. In the Pinedale Anticline, an Environmental Assessment to electrify compressors has been completed, however to date there have been no applications to convert the compressors from dirty fuel to cleaner electricity. This should be a requirement from the get go. While the Record of Decision for the Pinedale Anticline has the wording “best available control technology” this means nothing, because the companies can continue to operate with immunity from fines or shut down, because the wording is not specific.
5. The company/s should be required to pay every resident in Sublette County an amount in compensation for “taking” of a natural resource. Let’s face it, once a field gets developed, I don’t know of anyone who would want to picnic in that field.

6. Produced water and other wastes generated from drilling should be considered hazardous and handled as such. All wastes must be collected, treated and disposed of as hazardous. According to the the Wyoming Department of Environmental Quality, the Hazardous Waste Division.

   I look to the State of Wyoming, the Forest Service and local County officials to protect our environment and maintain a healthy economic environment in a manner that will be good not only for business but for the people the businesses are selling the end product to. I do not look to them for excuses for lax environmental protections and references to regulations.

   Sincerely,

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