

NOTICE OF ADDITIONAL PUBLIC SCOPING

PREPARATION OF AN ENVIRONMENTAL IMPACT STATEMENT

PLAINS EXPLORATION & PRODUCTION COMPANY EAGLE PROSPECT AND NOBLE BASIN MASTER DEVELOPMENT PLAN

BIG PINEY RANGER DISTRICT BRIDGER-TETON NATIONAL FOREST

INTRODUCTION

Public involvement is an important part of National Environmental Policy Act (NEPA) analyses for the U. S. Forest Service (Forest Service) and the Bureau of Land Management (BLM). We ask for your additional input to determine new issues for the changed scope of this environmental analysis.

Please take the time to read the following information and let us know your concerns about the proposed action and the decision to be made. We appreciate your contribution of time and effort, and believe the information you share with us will lead to a better decision.

The Forest Service and BLM received notification from Plains Exploration & Production Company (PXP) in 2005 that the company proposed to drill one to three exploratory oil and gas wells on National Forest System (NFS) lands located about seven miles southeast of Bondurant in Sublette County, Wyoming. The proposed wells would evaluate production potential within the Eagle Prospect. The Bridger-Teton National Forest prepared a Draft Environmental Impact Statement (DEIS), which was released to the public in February 2007. After release of the DEIS for the Eagle Prospect exploratory wells and in response to public comments and a request from PXP relative to cumulative effects, the Forest will expand the analysis to address a potential field development scenario or Master Development Plan (MDP), as provided for in the newly revised Onshore Order No. 1 (OO#1). The field development scenario contained in the MDP constitutes a substantial change in the proposed action analyzed in the Eagle Prospect Exploratory Wells Project DEIS and therefore requires the Forest to revise the analysis and prepare a new DEIS. The proposed project is now identified as the Eagle Prospect and Noble Basin Master Development Plan EIS.

A MDP under OO#1 contains information common to multiple planned wells clustered in close proximity. A MDP includes a master drilling plan, master surface use plan of operations and a listing of wells and facilities included in the MDP. A MDP also identifies the geographic boundaries of the plan, and lists all other facilities, including roads, staging areas, production facilities, pipelines, utility corridors, compressor stations, and water use or disposal facilities associated with the proposal. Approval of a MDP serves as approval for all the Applications for Permits to Drill (APDs) submitted with the plan. Any APDs submitted later, after the plan is approved, can reference the MDP and be considered using the NEPA analysis for the MDP. A MDP facilitates better planning of oil and gas infrastructure by taking into account development as a whole rather than piecemealed actions.



The approval or denial of a MDP and an APD to drill for oil and gas on NFS lands is accomplished through joint decisions made by the Forest Service and BLM. The Forest Service is responsible for the approval of surface plans, while BLM is responsible for the review and approval of the oil and gas operator's drilling plans and making the final decision on a MDP and an APD.

The MDP area encompasses the Eagle Prospect and additional NFS lands in the Noble Basin area located about seven miles southeast of Bondurant in Sublette County, Wyoming. The Eagle Prospect was evaluated in the DEIS released earlier this year. The MDP area is located within Townships 36 North and Range 113 West, 36 North and Range 114 West, and 37 North and Range 113 West, Sixth Principal Meridian, and includes the South Rim Unit, an exploration unit previously approved by BLM, and adjoining lands to the west.

PURPOSE AND NEED FOR ACTION

The Forest Service has previously approved surface operating requirements in the form of lease stipulations and notices, and BLM has incorporated these provisions within oil and gas leases which authorize the exploration for and the development of federal oil and gas resources in this area. The purpose and need for action is to determine whether and how (with what conditions of approval) to approve the exploration and potential development identified in the MDP submitted by PXP for lease operations on the Big Piney District, Bridger-Teton National Forest. The Forest Service needs to make a decision regarding the Master Surface Use Plan of Operations and the BLM needs to make a decision regarding the overall MDP and associated APDs.

PROPOSED ACTION

A MDP has been incorporated into the original exploratory proposal for the Eagle Prospect (refer to attached figure). The intent is to drill the originally proposed well and if successful, drill the Eagle 2-8 and 3-8 wells. The MDP provides a potential development scenario that could occur based on the results of the initial wells. Consideration of the MDP allows for analysis of potential cumulative effects early in the process. If subsequent development occurs, and occurs within the parameters of the approved MDP, further analysis will not be required. The MDP includes planned, anticipated, and potential development facilities which will be dependent on the results of the first wells drilled. Some or all of the MDP may never occur.

The Proposed Action considers implementation of the Eagle Prospect and Noble Basin MDP in two phases: Phase 1 (Exploration by Test Wells); and Phase 2 (Potential Field Development Scenario). Phase 1 consists of one to three test wells drilled from the Eagle 1-8 well pad for the Eagle Prospect. Phase 2 consists of field development in the Noble Basin area involving 133 bottomhole locations drilled from the Eagle 1-8 well pad and 16 additional well pads.

Each section undergoing development would have one well pad, with the exception of T.36N. R.113W., Section 5, which would have 2 well pads. A total of 8 wells would be drilled from each well pad, on a projected 40-acre well spacing in the prospective field development area. Phase 1 likely would be accomplished over a two-year period. Phase 2 likely would be accomplished over a ten-year period. One drilling rig would be used during Phase 1 and four drilling rigs would be used during Phase 2.

Access to the project area would be through Merna along existing system roads on NFS lands, which would be reconstructed and realigned to conserve resource values and reduce sedimentation and risks associated with unstable landslide areas. Based upon the success of the test wells, field development would involve expansion of the unit boundary and a total of 16 additional well pads for delineation, appraisal, and production wells, with associated roads and production facilities.

If full implementation of the MDP occurs, including exploratory drilling and the potential development scenario, the proposed project would potentially involve construction of 15 miles of new non-system roads and reconstruction or realignment of 14 miles of existing system roads on NFS lands. About 400 acres of potential new surface disturbance from roads, well pads, gathering lines for gas and produced liquids buried immediately adjacent to roads, and other facilities would be anticipated to develop 136 wells from 17 well pads over a 22 square mile area. The total potential disturbance represents about 3 acres of disturbance per well or about 3 percent of the land surface area over 22 square miles. Exploratory drilling associated with the Eagle Prospect would account for about one fourth of the potential new surface disturbance. To reduce potential impacts, some user-created roads would be reclaimed during project implementation, as specified by the Forest Service.

POSSIBLE ALTERNATIVES

The proposed access route for Phase 1 and Phase 2 has been identified. Possible alternatives to the proposed action include the selection of a different access method, route, or route segment and modification of other project design features. A reasonable range of alternatives will be evaluated and reasons will be given for eliminating alternatives from detailed study. A “no-action alternative” is required, meaning that the MDP and Surface Use Programs for the APDs under consideration by the BLM and Forest Service would not be approved. Alternatives will provide different access routes, methods, and project design criteria in response to public issues, management concerns, and resource opportunities identified during the scoping process. Scoping comments and existing condition reports will also be used to develop alternatives.

The alternatives to be considered for the MDP will focus on parameters for development rather than specific orientation of a well pad or a surveyed access road location. Specific surveys and designs will be completed before approval of subsequent APDs as part of implementation under the MDP. Three preliminary alternatives have been identified: 1) the no action alternative; 2) the proposed action – approval of PXP’s MDP, which includes three pending APDs and potential future development; and 3) the approval of the proposed MDP with modifications. As part of the project design, the Forest has worked closely with PXP in the development of a plan that included consideration of lease stipulations, Forest Plan standards and guidelines, and other resource needs. Components of the proposed project that did not meet those requirements were modified in the design stage. Access alternatives, including the use of helicopters instead of roads, will be fully explored as potential modifications to the MDP.

NATURE OF DECISION TO BE MADE

The Forest Service decision will be whether to approve the Master Surface Use Plan of Operations submitted by PXP for the proposed exploration and potential development outlined in the MDP for the Eagle Prospect and Noble Basin areas. The Forest Service decision will specify appropriate mitigation, access requirements, gathering lines, other facilities, and design criteria that will be applied to project

implementation. The BLM will review the Master Drilling Plan submitted by PXP and make a final decision on the MDP and associated APDs. Prior to approval of an APD, BLM is required to ensure drilling plans are designed to provide conservation of mineral resources, protect subsurface resources, such as groundwater, and ensure public health and safety. Subsequent processing of APDs and related authorizations constitutes implementation of this decision so long as all authorizing actions are consistent with lease terms and within the scope and framework of the approved MDP.

The Forest Service decision will include practices and measures identified as being needed during this analysis process in addition to any prescribed in the Forest Plan. This decision will be documented in the Record of Decision for the Eagle Prospect and Noble Basin Master Development Plan EIS. If the decision that is made would require an amendment to the Forest Plan, the analysis and documentation for the amendment will be included. The decision will be subject to appeal in accordance with 36 CFR 215 and 36 CFR 251.

PUBLIC INVOLVEMENT

The first formal opportunity to respond to the proposed action listed above was during the original public scoping process (40 CFR 1501.7) for the Notice of Intent published in the Federal Register on January 11, 2006. A scoping notice was also published in the Casper Star Tribune on January 13, 2006. Scoping for a supplemental statement is not required (40 CFR 1502.9(c)(4)), but due to the change in the scope of the analysis, the Forest is soliciting comments specific to the MDP and potential field development. Issues raised during the initial scoping period or the public comment period on the Eagle Prospect DEIS need not be re-submitted. The scoping process will assist the Forest in identifying specific issues to be addressed related to the purpose and need and the scope of the decision. Mail comments to the addresses given below under Comments. Ongoing information related to the proposed action and related analysis will be posted on the Bridger-Teton National Forest web site at <http://www.fs.fed.us/r4/btnf>.

The Forest Service is seeking information, comments, and assistance from individuals, organizations and federal, state, and local agencies that may be interested in or affected by the proposed action (36 CFR 219.6). The Big Piney Ranger District has scheduled the preparation of an EIS to disclose the environmental effects of the proposed project and determine whether the MDP proposed by PXP meets Forest Plan objectives. Public comments will be used and disclosed in the environmental analysis documented in the Eagle Prospect and Noble Basin Master Development Plan EIS. The EIS will evaluate the proposed action, no action, and other alternatives that may be developed during this process.

Public involvement for the proposed project (Eagle Prospect and Noble Basin Master Development Plan EIS) is being reopened by sending this scoping notice to parties on a mailing list prepared by Big Piney Ranger District. Public participation is being solicited by notifying in person and/or by mail known interested and affected parties. A supplemental notice of intent (NOI) to prepare an EIS is being placed in the Federal Register and will be used to inform the general public of the changes to the proposed project and request public comments. Announcements in area newspapers will be used to give local notice of planned public meetings. A legal notice in the Casper Star Tribune, the newspaper of record for the Bridger-Teton National Forest, will be used to give the public general notice of the re-opening of the scoping period.

PRELIMINARY ISSUES

Preliminary issues associated with the proposed action are listed below:

- 1) The drilling and production of the proposed wells could impact air quality and air quality related values, with emphasis on cumulative effects due to extensive development in the Pinedale area.
- 2) The development of a transportation system to support field development could adversely affect wildlife habitat, movements, and migration routes in the area.

RESPONSIBLE OFFICIAL

The responsible Forest officer for the decision on the surface use portion of the MDP is Greg Clark, District Ranger, Big Piney Ranger District, P.O. Box 218, Big Piney, Wyoming 83113 (307-276-5810). The responsible BLM official for the final decision on the MDP and associated APDs, which will incorporate the Forest Service decision, is Robert A. Bennett, State Director, BLM – Wyoming State Office, P.O. Box 1828, Cheyenne, Wyoming 82009.

PUBLIC MEETINGS

Public meetings in Jackson and Pinedale, Wyoming are anticipated during January of 2008. Forest Service and PXP representatives will be available at the meetings to explain the MDP and answer questions. The time and place for any public meetings will be published in the local papers and posted on the Forest website at <http://www.fs.fed.us/r4/btnf>.

COMMENTS

Your comments on issues that you feel should be evaluated as part of this MDP analysis are essential to the environmental analysis process. While comments will be accepted at any point during the analysis process until a decision is made, to be most useful, your comments must be received on or before **February 7, 2008**. The DEIS is expected to be available in May 2008 and the Final EIS (FEIS) is expected to be available by March 2009.

The Forest is soliciting comments specific to the MDP and potential field development. Issues raised during the initial scoping period or the public comment period on the Eagle Prospect DEIS need not be re-submitted. Comments on the MDP, possible alternatives, and issues that you feel should be evaluated as part of this MDP analysis should be submitted by the above date.

Send written comments to:

Greg Clark, District Ranger
Big Piney Ranger District
Box 218, Big Piney, Wyoming 83113

Comments may be submitted by telephone to Greg Clark at 307-276-5810 in Big Piney.

Electronic comments may be sent to comments-intermtn-bridger-teton@fs.fed.us with the subject line “Eagle Prospect and Noble Basin Master Development Plan”

Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record for this proposed action and will be available for public inspection. Comments submitted anonymously will be accepted and considered; however, those who submit anonymous comments will not have standing to appeal the subsequent decision under 36 CFR Part 215. Additionally, pursuant to 7 CFR 1.27(d), any person that may request the agency to withhold a submission from public inspection by requesting confidentiality should be aware that, under the Freedom of Information Act (FOIA), confidentiality may be granted in only very limited circumstances, such as to protect trade secrets. The Forest Service will inform the requester of the agency's decision regarding the request for confidentiality, and where the request is denied, the agency will return the submission and notify the requester that the comments may be resubmitted with or without name and address within (15) days.

Please direct any questions or requests for further information to Greg Clark at 307-276-5810 or 307-276-3375. If needed, call Greg Clark to make arrangements to review MDP maps and information.

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It's right to question energy development

By HAL HERRING

I'd like to respond to Dave Ballard's guest opinion, in the Tribune Dec. 8, entitled "Setting the record straight on oil and gas development."

Instead of "setting the record straight," Ballard engages in the art of disinformation when he assures Montanans that there is no need for concern in his industry's plans for thousands of new natural gas and coal bed methane wells on public lands.

Ballard seems to want to reassure Montanans that his industry plans to develop "only" 10,000 natural gas wells, as if that figure would have no impact on the public and private lands where the drilling will take place.

He does not mention that oil and gas companies have actually leased 4.4 million acres of Montana land for possible development.

He fails to mention that there are currently no regulations as to how densely the wells will be spaced on these leases, even though he must be aware of places like Wyoming, where development is well under way, where what were once thousands of acres of public grazing land is now a heavy industry matrix of well pads, some spaced as tightly as every 10 acres, roaring with truck traffic.

He tells us that his industry has made "great strides" in environmental protection but fails to



PETER AENGST PHOTO/MONTANA WILDERNESS SOCIETY

Development of federal land in the Jonah gas field of the Upper Green River Valley near Pinedale, Wyo., has a big "footprint."

cite examples, nor does he inform us that the federal laws that would require such protection for public lands, waters and wildlife have recently been dismantled.

Ballard's description of the amount of land disturbed by the drilling pads is deliberately misleading.

He asks, "How can potential development on 200 to 400 surface acres significantly impact the 73,000 acres recently withdrawn from the July BLM lease sale?" The answer to his question lies in Wyoming, in the Red

Desert, in the Jonah Field, the Pinedale Anticline, the Fontanelle Gasfield.

These are the current models of public lands energy development, and anyone concerned should go and see them. Industry spokespeople have long said that the area of disturbance of their developments was such a small percentage of the total land area, which might be true if the developments were crowded together into a tiny corner of the range. Instead, in reality, the development is spread over a huge area, com-

pletely dominating the landscape, impacting thousands upon thousands of acres with new roads, heavy truck traffic (11,000 vehicle trips in one month on Wyoming's Pinedale Anticline, the winter range for the state's largest mule deer herd), and the weeds, erosion, and loss of wildlife that are a part of any industrial landscape.

Anyone who drives through the Jonah Field or the Red Desert will see a landscape completely transformed by energy development. "Significant impact" does not begin to describe it.

America needs the energy that is being produced in Montana and throughout the Rockies. But that energy does not have to be produced at such a high cost to public lands and wildlife.

The raising of intelligent questions about energy development is not "fearmongering" as Mr. Ballard calls it. Citizens are absolutely right to question these coming energy developments, especially since we are the ones who will be paying the price for decades to come to try to reclaim these lands, try and re-establish the wildlife that will be lost, and deal with the massive weed problems that will follow the gas boom and be with us long after Mr. Ballard and his associates have retired on their profits.

Hal Herring, Augusta, is a freelance journalist who writes primarily about Western issues.

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