

## KIRBY HEDRICK

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Subject: Eagle Prospect Exploratory Wells DEIS

I appreciate the opportunity to provide these comments as part of the official record for the Eagle Prospect Draft EIS, which is analyzing Plains Exploration and Production (PXP) Company's proposal to drill three test wells on their leasehold in the Hoback Basin. I have previously supplied comments in a letter dated April 27, 2007. The comments in this letter should be considered supplemental to that letter and deal in more detail with the Forest Service's rationale for rejecting the potential for heliportable drilling without detailed study.

I am a resident of Sublette County and retired Executive Vice President of Worldwide Exploration and Production for Phillips Petroleum Company. During my 32-year career, I have been involved in the discovery and development of over 15 large oil and gas fields around the world. I am still involved in the oil industry as a board member of Noble Energy Inc. and Pengrowth Energy Trust. I am also a member of the Wyoming Environmental Quality Council.

As was noted in the April 27, 2007 letter mentioned above, the potentially viable alternative of heliportable drilling was rejected without adequate evaluation. Heliportable drilling is a complex subject but has a long history of successful application in the oil industry in remote areas. Its application for a future full field development would offer significant benefits to resource managers in minimizing the impact on wildlife and in this roadless area. Future development of the Eagle structure, as presented by Plains, will certainly require more than the 35 miles of new access opportunities to areas of high mineral or oil and gas potential for exploration and development that is contained in the current Forest Plan's Goals and Objectives for the pertinent management areas. Given the likelihood that intensive development in extensive roadless areas will

follow the 3 proposed appraisal wells, prudent planning and management would include a more detailed evaluation of the feasibility of heliportable drilling.

My involvement with heliportable drilling began as a drilling engineer designing a multiple well development program in 1979 in the rain forest on the island of New Guinea. In my professional opinion, the Draft EIS's five stated factors for finding helicopter access infeasible and not worthy of full alternative development are flawed or incomplete. Consider these points with the five factors mentioned in the Draft EIS:

1. **Need for buried gas line requires road access:** The DEIS represents that the three wells are exploratory in nature as opposed to the appraisal nature that Plains has related to their investors. If they are in fact exploratory, a gas line may not even be needed if the wells do not encounter hydrocarbons. Drill Stem testing and flaring of the gas and condensate is normally used to determine if the reserve is going to produce at sufficient quantities to justify a pipeline for a longer-term test. If the results of the first well indicate a temporary pipeline is needed (as Plains expects and has included in its proposal), it could be laid on the surface as is done elsewhere in Wyoming. ATV's could provide access to the pipeline where it does not follow the existing roads. Any repair equipment could be lifted in by helicopter. The temporary pipeline could be recovered at the end of the test period and the access corridor reclaimed without leaving a new permanent road. Permanent pipelines could be properly sized, permitted and buried as part of a future overall development plan. In other words, heli-transport of the drilling rig and other heavy infrastructure does not preclude construction of a temporary surface pipeline. Road access is not required for a pipeline. There are numerous examples of pipelines that do not follow roads in Wyoming and elsewhere. The Forest Service has not adequately described why the proposed Eagle Prospect pipeline is an exception to the common practice of constructing pipelines where no roads exist.
2. **Helicopter access would increase costs and potentially make the project cost prohibitive:** Considering that Plains has represented to its investors that the proposed wells are intended to appraise a prospect the size of Jonah, three wells drilled by helicopter are easily paid from billions in future income if they are successful. Helicopter rigs are more expensive but there are numerous examples where companies have undertaken these increased costs and employed them. The Forest Service has failed to adequately study the economic costs against the resource protection advantages of heliportable drilling. The claim that the project is cost prohibitive is not substantiated by analysis nor have the future resource protection benefits of heliportable drilling been adequately evaluated.

3. **Increased disturbance to wildlife and subdivision residents with helicopter access:** This may be true to some degree but by itself is not sufficient to rule helicopter access infeasible as it may be that the short but intense disturbance from helicopter traffic is less disruptive from a wildlife and residence standpoint than the longer, more comprehensive disturbance caused by new road construction, increased access, truck trips, etc. Only by fully developing and analyzing a helicopter access alternative can the relative disturbance of helicopter access vs. the proposed action be accurately known. Once this is done, it is a simple matter to obtain input from the local residents on which alternative they view as less disturbing. The Forest Service has failed to sufficiently evaluate heliportable drilling against new road construction to substantiate this claim.
  
4. **Road access needed for well control operations, a medical emergency, or a wildland or operations fire:** Helicopters are routinely used for medical emergencies in the backcountry. Having a helicopter staged and ready nearby would largely address this need. In fact, medical evacuation times will almost certainly be less than reliance upon an ambulance from Pinedale. Night flying and inclement weather require special arrangements but these are certainly not impossible with proper preparation. Sublette County Search and Rescue has extensive experience performing backcountry rescues and could be drawn upon in developing medical evacuation plans that would be less complicated than many of their backcountry medical rescues. Whether a road is constructed or not, water needs for both fire fighting and well control operations should be met through access to surface water and the drilling of water well at the well pad. If heliportable drilling were utilized, portable firefighting pumps can be prelocated onsite and crews trained for emergencies as is routinely done on remote offshore platforms. Response times will be less than relying on volunteer firefighters from Daniel or Bondurant. Stored water can also be accessed by wildland firefighters in the event of a wildfire. **Reliance on trucking water to this location in the event of a well control emergency is a serious safety flaw. The steep roads combined with intense rain or winter storms can prevent water tender access at the critical times they are most needed. I strongly encourage the Forest Service to ensure adequate water sources and storage are located onsite to handle well control needs and firefighting without reliance on trucking.**
  
5. **Inadequacy of helicopter transport for computer equipment and water needed for the project:** Again, the inability to rely on trucking water to the site during extreme weather conditions dictates that onsite water sources and storage must be adequate for well control and

firefighting needs even if a road is constructed. The wells cannot be safely drilled and should not be permitted without Plains having adequate local water sources and storage on or near the site. As noted above, water tenders cannot, and should not, be relied on for supplemental water supplies as they may be unable to access the wellsite during well control incidents that occur during adverse weather conditions. Drilling related computer equipment is regularly helicopter transported to offshore drilling platforms. Computer equipment can similarly be transported to the Eagle Prospect. The drilling rig will utilize satellite communications and the road has nothing to do with that capability. This reason for rejecting helicopter access is either flawed or not adequately explained by the Forest Service.

It should also be noted that a detailed study of heliportable drilling conducted for the British Columbia Ministry of Sustainable Resource Management in 2002 (attached) determined that "heliportable drilling should be included in the range of land use management tools used by resource managers." I urge the Forest Service to review and carefully consider the findings in this well documented study that included participation by several major oil and gas operators. If feasible, the use of heliportable drilling on the 3 proposed wells would provide valuable experience and knowledge which could be applied in a full field development to minimize environmental and resource impacts.

Considering the above, I recommend the Forest Service fully develop a helicopter access alternative and evaluate it next to the two existing action alternatives. The public and the decision maker should have a complete understanding of possible impacts with road improvement/construction vs. no road improvement/construction (i.e. helicopter access) and effectively consider feasible mitigation measures as NEPA intends before approving the Eagle Prospect EIS:

I look forward to hearing from you on your response to the points and recommended EIS changes articulated in this letter.

Sincerely,

Kirby Hedrick