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September 12, 2007

Mr. Curtis Bryan  
Natural Resource Specialist  
Bureau of Land Management (BLM)  
Lander Field Office  
1335 Main Street  
Lander, WY 82520

**RE: COMMENTS FOR BEAVER CREEK COAL BED NATURAL GAS PILOT  
PROJECT, FREMONT COUNTY, WYOMING**

Dear Mr. Bryan:

The Wyoming Pipeline Authority (WPA) is pleased to submit to the BLM comments regarding the Beaver Creek Coal Bed Natural Gas Pilot Project Environmental Assessment dated August 2007. The WPA recommends that the Proposed Action be adopted for the Beaver Creek Pilot Project of 20 exploratory wells located in Fremont County, Wyoming.

The WPA supports the Proposed Action to help meet the continuing needs and economic demands of our nation's reliance on fossil fuels. National trends indicate that demand has and will continue to outstrip supply. The need to develop mineral resources to meet continuing national needs, economic demands, and reduce our reliance on foreign energy sources is crucial so long as it is developed in an environmentally sound manner and within the guidelines of the area's Resource Management Plan (RMP). According to the Lander RMP, public lands will be made available for oil and gas leasing and development to the maximum extent possible, while giving due consideration to the protection of other significant resource values<sup>1</sup>.

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Devon Energy Production Company, L.P. has the right to explore and develop mineral resources under their current federal land lease. It is in the best interests of the Nation and the state of Wyoming to determine the viability of the coal bed natural gas (CBNG) deposits within the Beaver Creek Project Area.

CBNG has the ability to bring environmental, as well as economic benefits to Wyoming. Use of Coal Bed Natural Gas is not only a plausible contribution to reducing our reliance on foreign oil but it is also the most efficient and cleanest burning fossil fuel. According to the Coal Bed Methane Alliance, Wyoming is estimated to possess more CBNG resources than any other of the lower 48 states. Development of CBNG could provide substantial revenue from federal and state taxes, rents and royalties generated within Wyoming's boundaries. The WPA also concurs with Devon's water management plan to use an injection well with evaporation ponds as a backup method. The use of deep injection well technology removes potential pollutants from the accessible biosphere and can ease regulatory compliance.

The WPA appreciates the opportunity to submit these comments. If you have any questions, please do not hesitate to contact us by email at [wyoingpipeline@qwest.net](mailto:wyoingpipeline@qwest.net) or by telephone at 307-237-5009.

Sincerely,

Kellie Cairns Vlastos

Wyoming Pipeline Authority

<sup>1</sup> Bureau of Land Management. 1986. *Lander Resource Management Plan Final Environmental Impact Statement. Preferred Alternative- Consultation and Coordination*. U.S. Department of the Interior, Bureau of Land Management, Lander Resource Area, Wyoming.