



PIPELINE AUTHORITY

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January 7, 2008

Bureau of Land Management  
Kemmerer Field Office  
Attention: Ms. Michele Easley  
312 Highway 189 North  
Kemmerer, WY 83101-9711

**RE: MOXA ARCH AREA INFILL GAS DEVELOPMENT PROJECT DRAFT  
ENVIRONMENTAL IMPACT STATEMENT FOR THE KEMMERER FIELD  
OFFICE PLANNING AREA**

Dear Ms. Easley:

The Wyoming Pipeline Authority (WPA) is pleased to submit to the BLM comments regarding the Moxa Arch Area Infill Gas Development Project Draft Environmental Impact Statement for the Kemmerer Field Office Planning Area dated October 2007. The WPA recommends that **Alternative B** be adopted for the Kemmerer Field Office Planning Area.

Alternative B focuses on full field development with low surface disturbance. This alternative allows for approximately 85% resource recoverability while still reducing the amount of long-term surface disturbance. Alternative B is favorable because it would place a limit on the amount of active surface disturbance in the MAA at any given time. Operators could drill up to 205 wells per year as long as active, un-reclaimed surface disturbance associated with oil and gas drilling and exploration activities across the MAA remains less than 10,921 acres. Once evidence is provided that reclamation standards have been met, the successfully reclaimed acreage would be subtracted from the 10,921 acreage cap and new wells would be authorized. With the proposal of additional infill drilling in the MAA, the WPA encourages the appropriate development of infrastructure to accommodate the additional gas production. Alternative B allows the Operators to fully develop the MAA while applying Best Management Practices to reduce impacts on Wyoming's sensitive resources.

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