

NWCOS COMMENT FORM FOR 6/27/05 DRAFT ALTERNATIVES

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We have a concern with the following section:

Topic: Habitat Management : Sage Grouse _____

Page number: 15 _____

Our concern is:

Habitat destruction and fragmentation is a major cause for concern for these birds and other wildlife species. The alternative as written would provide ample protection for the sage grouse. However, this is restrictive to O&G operators. Well spacing is another concern. I do not know what spacing this species will tolerate, but 20, 40, or even 80 acres is too dense for the health of the sage grouse.

Our recommendation for improvement is:

Beginning 0.25 mile inside the four mile perimeter, the use of a pitless, self contained drill rig would be allowed to drill a well. No grading of road will be allowed. Access will have to be perpendicular to the lek. Collection of product will have to follow the tracks of the drill rig. Monitoring will have to occur semi-annually by a neutral scientific entity, selected by the BLM. If no adverse impact is noted on the sage grouse after a period determined by the BLM, the operator may set up another rig 0.5 mile inside the perimeter. At no time may the well spacing be less than 160 acres. This shall continue to move inside until there is a detectable impact on the sage grouse, or the three mile limit is reach, whichever occurs first. If an impact is detected on the sage grouse, the well will be capped and abandoned immediately.