

Proposal for Year-Round Drilling In Exchange for Enhancement of Wildlife Habitat: Julander Energy Company, Western Gas Resources and Questar Exploration and Production (the gas companies or GC's) propose that BLM evaluate year-round drilling in exchange for mitigating actions on the limiting wildlife resource. The GC's have numerous leases in the Little Snake Field office that are stipulated with various wildlife restrictions. The GC's are requesting permission to drill on 2 of those sections per company per year during the seasonal restriction time period specific to those sections in exchange for enhancement of wildlife habitat in or around those areas as soon as practicable but within one year from the date drilling commences in a given section. We would agree to do all of our survey work and submit our applications for permit to drill (APD's) during the spring and summer months prior to the first snowfall so proper on-site visits and archaeological clearance work could be completed. We would also work with the BLM and DOW wildlife biology staff to develop the enhancement projects to be undertaken to ensure proper planning and execution.

For discussion purposes, examples of wildlife habitat enhancement opportunities would be:

Wild Horses: Provide a wild horse watering area away from 2 sections with the wild horse foaling restriction to attract the horses away from the drilling activity during foaling season (3/2-6/30).

Big Game: Enhance big game winter range to attract desired wildlife in the spring and summer following drilling on 2 sections per leaseholder from 12/1 through 4/30.

Prairie Dog Burrows: Permit surface disturbing activities in or near prairie dog burrowing areas as it actually encourages prairie dogs to develop new habitat along pipeline corridors, for example. Please refer to White River Field Office Rangely Oil Field EA documents for BLM analysis on this subject.

According to representatives of the BLM, they do not want to put these examples in the plan because they are prescriptive. However, we would suggest a list of examples for each wildlife resource with an introduction that would say "including, not limited to" so that other ideas or new techniques could be considered throughout the life of the plan.

This proposal is not meant to address down spacing of well locations in a given oil and gas field. It merely addresses opportunities for continued drilling throughout a calendar year in exchange for help BLM and DOW improve wildlife habitat.

We believe this would be a win-win for wildlife, our industry, and nation's energy supply situation as a whole.