



PO Box 7186 Missoula, MT 59807 (406) 543-0054

24 March 2008

Robert Gunderson  
Bureau of Land Management  
Dillon Field Office  
1005 Selway Drive  
Dillon, MT 59725

Re: Scoping for Green River Energy Resources Geophysical Exploration

Dear Mr. Gunderson:

This letter constitutes scoping comments from Montana Trout Unlimited for the NEPA analysis for geophysical exploration Green River Energy Resources proposes for federal, state and private land near Lima, Montana. Montana TU represents 3,400 conservation-minded anglers, including many who recreate in the vicinity of the proposal. Montana TU's interest in ensuring oil and gas development doesn't harm conservation values in this area has been recently demonstrated through its formal protests and subsequent appeal to the Interior Board of Land Appeals of several oil and gas leases BLM sold in 2007 that are located in the same vicinity.

We strongly urge BLM to prepare an environmental impact statement prior to issuing a decision on this proposal. Given the scale of the proposal and the numerous and highly valuable fish, wildlife and recreational values at risk in this area, it is apparent to us that an environmental review of more substantial nature than an EA is merited.

Consider that the proposal:

- Involves three separate transects totaling nearly 36 miles;
- Contemplates more than 10 weeks of field activities;
- Proposes some 875 blast holes and installation of microphones at 144 locations;
- Crosses two federal ownerships, as well as private and state lands;
- Involves numerous helicopter overflights and landings totaling an estimated 6-7 hours a day for more than five weeks;
- Entails many potential off-road vehicle routes;
- Is in an area that receives significant use during the hunting season;

- Is proposed during a period of the year when fish and wildlife are especially susceptible to human disturbance; and
- Will occur in important habitats used by numerous sensitive species, including bighorn sheep, sage grouse, pygmy rabbits and cutthroat trout, and could further implicate important seasonal habitats for burrowing mammals and birds, neotropical migratory birds, elk, mule deer and pronghorn antelope.

We thereby believe an EIS is more than appropriate. Further, we note that the BLM's most recent Resource Management Plan, the Beaverhead-Deerlodge National Forest's 1987 forest plan, the forest's 1996 oil and gas EIS and the 2008 Final EIS and forest plan did not contemplate or evaluate the impacts of this type of proposal in this location. Further, the reasonable foreseeable development scenario for oil and gas development in the region that the agency developed in its recent RMP – the projects of which we have questioned -- didn't seem to implicate seismic exploration of this scale. Basically, little environmental analysis of any detail for this type of proposal in this area is available.

Our specific concerns for fisheries extend to several issues that require detailed analysis:

- The effect of sonic waves on fish, as well as on embryos that could be in the gravel, depending on season of use;
- The potential impact on water quality from motorized use at stream crossings or along roads adjacent to streams, as well as contaminants that might be associated with drilling or helicopter staging areas.

Because of the importance of this area to wintering big game, lambing habitat for bighorn sheep, breeding sites for sage grouse, and because its fish-bearing streams are inhabited by species that spawn or have incubation periods that can extend from late fall (brown trout) to early summer (rainbow and cutthroat trout), it seems like winter and spring are not very appropriate seasons for this type of activity. Further, because of the high level of hunting use this area receives in the fall, starting with archery season in September, antelope season starting in early October and general big game season extending until the end of November, it appears the season with the least potential for conflicts would be in mid-summer. At that time, however, there will be conflicts with angling use on Big Sheep Creek, domestic grazing as well as issues related to fire risk. We expect BLM to evaluate the season of use in detail in the NEPA analysis.

Thank you for the opportunity to comment. We look forward to evaluating the potential impacts of the proposal in a detailed EIS.

Sincerely,

Bruce Farling  
Executive Director

