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BY ELECTRONIC MAIL (<u>UT_Vernal_Comments@blm.gov</u>)

November 20, 2006

Bill Stringer - Vernal Field Office Manager Bureau of Land Management Attn: Enduring Resources' Rock House Gas Well Environmental Assessment 170 South 500 East Vernal, UT 84078

Dear Mr. Stringer:

We are writing to you regarding our serious concerns about the escalating negative impacts from BLM approved natural gas activities in and around Utah's last wild and natural section of the White River. As you may know, a number of local and regional businesses and associations, individuals, and conservation organizations provided your office with detailed comments on the draft Vernal field office resource management plan and urged the BLM to put in place protective management for the entire White River Wilderness Inventory Area (WIA), the potential White River Area of Critical Environmental Concern (ACEC) and the proposed Wild and Scenic segment of the White River – under the Wild and Scenic Rivers Act. We have also submitted written comments to you from time to time on specific proposed projects that have threatened the integrity of the White River and requested that you exercise your discretion to protect this important resource. For many of us, our businesses and livelihoods rely on the remote nature of this stretch of river (as well as other nearby rivers similarly at risk), its abundance of wildlife, natural quiet, dark skies and wild qualities. We are seriously concerned that our customer base will begin to choose other places to spend their time and money if the White River continues to be severely impacted by natural gas development. In addition, many of our members recreate and enjoy the peace and quiet found on the White River and are gravely concerned that the special qualities of this place are in jeopardy of being lost to the sight and sound of natural gas development.

Unfortunately, it has come to our attention that the BLM is reviewing the Enduring Resources' Rock House Gas Well Proposal Environmental Assessment (EA) within the White River area – yet another project that threatens this important river corridor. This proposed project would have significant negative impacts on the wilderness character and outstanding recreational qualities that this segment of the White River offers. The proposed project, one of several natural gas development projects that the BLM is in the process of completing within the river area, will continue to transform this natural and exceptional wild river segment into just another industrial complex. Ultimately, this project may be the one that "breaks the camel's back" – altering the river experience to such a degree that wilderness characteristics would be eliminated and the river's recreational opportunities would be severely impacted.

Specifically, as proposed, the Rock House project would develop 55 new natural gas wells on 24 new well pads, along with related infrastructure near and within the White River corridor. We strongly disagree with the EA's assertion that this development would have only "minor" or "insignificant" impacts to the river's natural quiet, opportunities for wild and primitive recreation, and the overall visitor experience. To the contrary, the sound and sight of natural gas development is already beginning to

intrude on this largely pristine environment and new development activities will only make things worse. In short, the sound of gas development carries up and down the river corridor and the sight of this development (even if painted a non-reflective color or otherwise "disguised") attracts even the casual viewer's attention and mars the natural landscape. These significant impacts are incorrectly downplayed in the EA and must be addressed. Furthermore, the ongoing development activities in the river area should be assessed as a whole so that the public and the agency can view holistically the changes to this unique area (i.e., to its wilderness character, to the potential for Wild and Scenic River designation, etc.). We believe that when considered together, the past, present (i.e., proposed), and future development will significantly impair the river's important recreation and wilderness values. Therefore, we are formally requesting that BLM prepare a comprehensive environmental impact statement (EIS) to adequately analyze the impacts of these potential gas wells, new roads, pipelines and compressor stations on the White River wilderness inventory area, the proposed White River area of critical environmental concern and the proposed White River Wild and Scenic designation.

Thank you for your time and consideration of these comments. Please keep us notified of upcoming opportunities for public input in the NEPA process.

Sincerely,

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Cc: The Honorable Jon Huntsman John Harja, Executive Director, RDCC Robin Fehlau, Outdoor Recreation Planner, Utah State Office – BLM