

February 3, 2012

Dear Wyoming Range supporter,

In November the Forest Service announced that it would be requiring a supplemental draft EIS (SDEIS) on PXP's proposed drilling project in the Upper Hoback. If you recall, none of the original alternatives in the last draft considered holding PXP to the terms of its leases—terms that prohibit surface occupancy in more than 70 percent of the Upper Hoback Basin. PXP ignored these contractual lease terms when it submitted its drilling proposal and the Forest Service mistakenly overlooked this error. Since that release, we have been researching and evaluating the potential impacts of this news.

We are concerned that the Bridger-Teton National Forest may not require the company to abide by the environmentally-protective lease stipulations that have been attached to the PXP leases ever since those parcels were sold in 1994.

These stipulations were formally placed on these lands in the Upper Hoback to ensure that wildlife, scenic, water and other resource values were strongly protected into the future. Our position is that these stipulations were promises made to the public that if oil and gas drilling were to occur in this area, development would be held to a very high standard and air, water and wildlife qualities protected.

Of particular concern is a stipulation called the Jackson Hole Oil and Gas Lease Stipulation. This stipulation prohibits surface disturbance within a quarter-mile on either side of existing roads. Combined with the other lease stipulations that prohibit surface disturbance due to steep slopes and unstable soils, the enforcement of the Jackson Hole stipulation would put more than 70 percent of the basin off-limits to well pads and other industrial facilities.

We think the Forest Service should not negotiate or waive these lease stipulations – these lease restrictions are part of the formal contract of the lease and the company was fully aware of these when purchased. Now is not the time to “lower the bar” of resource protections for the Upper Hoback! If the FS is compelled to offer an alternative in the SDEIS that considers waiving or modifying either the legal stipulations attached to the leases or the existing Forest Plan, then they must also offer the public a conservation alternative that complies with both.

In addition to meetings with the FS, we have engaged in media efforts to energize and inform the public. If you go to [http://jhnewsandguide.com/article.php?art\\_id=8199](http://jhnewsandguide.com/article.php?art_id=8199) , you will find a front page article that ran in the Feb 1st edition of the Jackson Hole News and Guide that discusses many of our positions.

Citizens for the Wyoming Range supporters are often asking “What can we do?” Here’s your opportunity to do something at a critical time:

1) Please write a letter to the editor of the News & Guide soon expressing your concerns on this topic. You can email that to [editor@jhnewsandguide.com](mailto:editor@jhnewsandguide.com). (There’s also a button to do this right on the webpage of the article, cited above.) It’s important to show how controversial and unpopular the decision to waive protective stipulations would be.

Here are some ideas of talking points you can use. However we encourage you to voice your personal concerns and experiences.

This is an issue about trust. Lease stipulations are attached to federal oil and gas leases at the time of lease sale. These are included to protect the sensitive resources often found on public lands. In effect, these are promises made to the public that if lands are developed, the stipulations will protect other resources. These stipulations have been in place since the day PXP acquired its leases. The public intends to hold the Forest Service to its word.

This is not about PXP’s bottom-line. The stipulations should not be waived because it makes it easier or cheaper for PXP to do business. The company knew from day one what the stipulations required and that a very small portion of the basin would even be available for surface occupancy. PXP should be required to propose a scaled-back project that honors and respects the terms of its leases.

Err on the side of public transparency. Even if the Forest Service thinks that it can protect the resource better without these stipulations, they should recognize how extremely suspect this will seem to the public. They must err on the side of full disclosure and include a stand-alone alternative in the SDEIS showing full enforcement of the stipulations—not a single alternative that shows waivers and modifications of the stipulations. That way, the public can compare alternatives.

The Forest Service must do this right. Drilling on the Bridger-Teton National Forest, at the headwaters of a wild and scenic river and in “one of the most important wildlife crossroads in the nation” requires the best analysis, not a rushed and incomplete process.

I wouldn’t ask you to take this step now if I didn’t think this was very important. Thank you for your patience with this long email. Please feel free to call or email me if you have questions. Thank you for your help!

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