



12 April 2014

Mr. Mike Taylor  
Director, Technical Assurance  
U.S. Department of Energy  
Rocky Mountain Oilfield Testing Center

Dear Mr. Taylor:

On behalf of The Science Committee of the Wyoming State Chapter of The Wildlife Society (WYTWS), we appreciate being contacted for commenting on the *Draft Site-Wide Environmental Assessment for the Diversiture of Rocky Mountain Oilfield Testing Center and Naval Petroleum Reserve No. 3*. The proposed action obviously has the potential to impact wildlife and their habitats on site, and possibly sets a precedent that will be revisited in the future depending on what occurs with this particular situation. We provide comments consistent with scientific perspective as to which alternative would be in the best interest of wildlife that inhabit the area of interest.

Based on the alternatives provided through the assessment, we believe that alternatives 2 or 3 would be most beneficial for wildlife and their habitats. Under alternative 2, the BLM would likely have greater authority and incentive to implement policy, standards, and guidelines that protect and mitigate negative effects to wildlife and their habitats when compared to operations that occur under private ownership. Invasive plant species and noxious weeds are a problem on the site, and if sold as deeded land, it would be difficult to direct or negotiate actions that control or mitigate the spread of non-native and invasive species. For example, there are several golden eagle nests on and directly adjacent to the property and clearly defined eagle foraging areas on the property (i.e., prairie dog towns) that would likely be better managed by BLM in light of BGEPA.

In the long-term, if the BLM leased the property or managed the area under DOE ownership we believe that conservation and management of the area would be much more feasible than if ownership was transferred to a private entity. If the property was managed or overseen by a public agency (i.e., alternatives 2 or 3), future leases would be required to follow standards and guidelines put in place to help protect Wyoming's wildlife and habitat resources. The argument could be made that, even though it may not be economically profitable for the DOE to continue administering the area, other interests for the resource make it worth maintaining in the current *status quo*. We believe an area's value to the state and country can't be judged solely by the net economic value of current and future mineral production.

Based on the scientific merits and potential to impact wildlife and wildlife habitats, it is critical to maintain some kind of oversight from the standpoint of maintaining and promoting natural benefits of the landscape and wildlife populations therein. If the DOE continues to operate the area, perhaps there could be efforts set forth to transfer direction to a federal or state agency in the future. Prior to transition, DOE

could close existing permits not required for maximum efficient rate (MER) and concentrate activities to central portions of NPR-3 for future lease use. This would allow remaining production wells and infrastructure to be leased and would potentially open lands to the public and to beneficial management strategies.

We realize the difficulty in evaluating this situation from fiscally and biologically feasible perspectives. From our viewpoint, it is most critical to assess the potential negative impacts to wildlife and wildlife habitats. We believe that potential negative impacts to wildlife would most likely result from increasing oil exploration and drilling activities in the area if the property were sold to a private entity that is not necessarily required to draft and implement a plan with standards and guidelines that promote wildlife and wildlife habitats or mitigate negative impacts therein. Again, we sincerely thank you for the opportunity to comment, and the WYTWS would be happy to provide to provide you any other expertise or assistance as this project moves forward.

Sincerely;

Martin Grenier  
WYTWS President

Dan J. Thompson  
WYTWS Science Committee Chair