

CHAPTER V

PUBLIC COMMENTS AND ISSUE RESOLUTION

The following list describes how each of the issues generated from internal and external scoping were addressed for the Oil and Gas EIS. The issues appear in bold print and are sometimes grouped by subject matter. Interdisciplinary team (ID Team) responses follow each highlighted issue.

THE FOLLOWING ISSUES WERE GENERATED FROM INTERNAL SCOPING

1. **Heritage Resources**

Most known sites are points on a map. Appendix X of the Forest Plan calls for No Surface Occupancy within a specified distance of inventoried archaeological, paleontological and historical sites. The Forest Archeologist must specify that distance. He will generate buffer acreages from maps that WILL NOT be made public. The Regional Office personnel who put the lease packages together will know where the large sites are so their stipulations will be applied during the leasing process.

2. **Geothermal leasing**

Geothermal leasing is a separate process from oil & gas leasing, so its leasing will not be considered in this EIS. Current technology can mitigate the effects of oil and gas drilling on geothermal resources. The geothermal layers lie above the targets for oil and gas drilling.

We asked the BLM to analyze whether or not oil and gas drilling and production operations within the Beaverhead National Forest (BNF) would impact the geothermal features in Yellowstone National Park or anywhere else in the analysis area. In a letter dated 9/28/93 from the the BLM, they conclude, "...that oil and gas drilling and production operations within the BNF EIS analysis area would not impact geothermal features in Yellowstone National Park, or elsewhere within the BNF." They further state, "(s)hould oil and gas drilling be proposed within the BNF each proposal will be analyzed to assure the protection of the public health, safety and environment. These provisions can be found in the 43 CFR 3160 regulations and in Onshore Oil and Gas Order 1 and 2. Measures would be taken to protect any geothermal resource through placement of casing and cement in the hole

across these zones. The drilling program would be reviewed and inspected to ensure the protection of fresh water and geothermal zones as well as oil and gas zones."

3. **T, E, & S plants, animals and fish**

The ID Team made this a driving issue for the analysis.

Oil and gas activity could affect the habitat of threatened and endangered species such as bald eagle, peregrine falcon, grizzly bear, and gray wolf. Also affected could be habitat of the sensitive Westslope cutthroat trout, and other wildlife and plants. In addition to the discussions in Chapters III and IV, a Biological Assessment will be prepared for the selected alternative and included with the Final EIS. The BA will disclose the effects of the selected alternative on threatened, endangered, and sensitive species.

Sensitive plant potential will be identified by habitat types. Sites that contain likely sensitive plant locations will follow mitigation scenarios in the event of an Application for Permit to Drill. Also, a Lease Notice will be attached to each lease to notify the lessee a biological study may be required before surface disturbance if a sensitive animal or plant species or their habitat is present. See Appendix H for an example of the Lease Notice. Any proposed operations will have to be located or conducted in such a manner as to maintain the viability of these species.

4. **Increasing the vulnerability of wildlife by building new roads**

The ID Team made this a driving issue for the analysis, combining it with #3 under one general issue. See Chapter IV, pages 9-20 for a full discussion.

5. **Aesthetics--the sights, sounds, and smells associated with oil and gas exploration and production**

The ID Team made this a driving issue for the analysis, including it under a broader category of effects on the recreation resources of the Forest. See Chapter IV, Scenic Resources, pages 58-68 for a full discussion. Sights, sounds, and smells are also dis-

cussed under the Chapter IV Recreation effects analysis on pages 52-57.

6. Public safety--primarily, increased traffic from large vehicles during hunting season

Public safety was considered because of the tremendous volume of traffic in the Gravellies during hunting season. The effects of each alternative on public safety will not be analyzed. Rather, safety will be a foremost consideration for any Application for Permit to Drill.

7. Soil stability

The ID Team made this a driving issue for the analysis, combining it under the general heading of soil and water quality. See Chapter IV, pages 20-40 for a full discussion. This is also discussed under Comparison of Alternatives in Chapter II.

8. Effects on inventoried roadless areas.

The ID Team made this a driving issue for the analysis. See Chapter IV, pages 3-8 for a full discussion.

9. Social/Economic

The team discussed whether to carry social/economic impacts as a separate issue. A detailed social/economic analysis has been prepared for this project and is available upon request. A summary of the document is disclosed in Chapter IV, at pages 80-85 and in Chapter II at page 21. This was not carried forward as a driving issue.

10. Including a no-sediment road construction requirement as a feature of one alternative.

The team concluded the Forest continually gets stricter on road building to prevent sedimentation. Best Management Practices will be applied to any oil and gas activities (Chapter II, page 4). Because the roads analyzed in this analysis are hypothetical, we did not apply any additional construction requirements. Any APD proposals will undergo separate NEPA analysis and no-sediment requirements would be more appropriate at that level.

11. Including helicopter access only as a feature of one alternative.

The team discussed requiring helicopter access to certain areas as a feature of an alternative. We decided we wouldn't require it. It may, however, become the only way to reach an island of available, non-NSO

land surrounded by NSO. It would then be up to any potential lessee to decide if the parcel was economically worth leasing.

12. Make currently proposed wilderness bill lands administratively unavailable.

The currently proposed areas in HR2473 are all within MA 8. A range of stipulations from standard terms to not available for leasing is being considered for the areas proposed as wilderness by HR 2473. Based on direction from the Regional Forester, all HR 2473 lands on the Beaverhead will be managed under their current management area direction (MA 8).

Alternative 6 analyzes the effects of making HR2473 lands not available for leasing. The effects of not leasing areas prescribed for wilderness in other bills will be disclosed by analyzing Alternative 3.

The ID Team also considered the effects of not leasing lands contained in the Northern Rockies Ecosystem Protection Act (NREPA). The effects of not leasing lands contained in the NREPA bill (HR 2638) were very similar to those disclosed in Alternative 6 so the NREPA alternative was not fully developed.

13. Make currently proposed wilderness bill lands "no lease."

This was analyzed in Alternative 3. It was also analyzed in the not fully developed NREPA Alternative. Alternative 6 analyzed the effects of making areas proposed for wilderness in HR2473 not available. See Chapter II for more information.

14. Make currently proposed wilderness bill lands NSO with language in waiver, exceptions, and modifications to change the stipulations pending congressional action.

The Deciding Officer advised the ID Team to treat lands proposed as wilderness in any wilderness bill proposal the same as their current Management Area direction. No Surface Occupancy stipulations are applied to all HR 2473 wilderness bill lands and some of HR 2638 wilderness bill lands in Alternative 4.

15. Making wild segments of wild and scenic rivers available for oil and gas leasing.

We recognize the Wild and Scenic Rivers Act of 1968 does not preclude oil and gas leasing along rivers designated as suitable for further study. However, Forest Service policy protects rivers designated as suitable for study for "wild" status from leasing by

making them not available. We have applied a range of stipulations to rivers eligible for study as scenic and recreational rivers. Also see Forest Plan Amendment #1.

THE FOLLOWING ISSUES WERE GENERATED FROM EXTERNAL SCOPING

1. Roadless Areas

Oil and gas activity could alter the undeveloped character of roadless areas. The ID Team made this a driving issue for the analysis. See Chapter IV, pages 3-8 for a full discussion.

2. Areas proposed for wilderness designation in HR 2473

The ID Team analyzed a range of stipulations for these lands, from "not available" to "lease with standard terms." If these areas become wilderness, they will not be available for leasing. If they do not become wilderness, the deciding officer may study the analysis of the effects of oil and gas activity and choose from a variety of stipulations to apply to the land.

3. Areas allocated to semi-primitive recreation (MA 8)

The ID Team analyzed a range of stipulations for these lands, from "no lease" to "lease with standard terms." If any of these areas become wilderness, they will not be available for leasing. If they do not become wilderness, the deciding officer may study the analysis of the effects of oil and gas activity and choose from a variety of stipulations to apply to the land.

4. Wild and Scenic Rivers

We recognize the Wild and Scenic Rivers Act of 1968 does not preclude oil and gas leasing along rivers designated as suitable for further study. However, Forest Service policy protects rivers designated as suitable for study for "wild" status from leasing by making them not available. We have applied a range of stipulations to rivers eligible for study as scenic and recreational rivers.

5. Threatened, Endangered, and Sensitive Plants, Fish, and Wildlife

Oil and gas activity could affect the habitat of Threatened and Endangered Species such as bald eagle, peregrine falcon, grizzly bear, and gray wolf. Also

affected could be habitat of the sensitive Westslope cutthroat trout, and other fish, wildlife and plants. The ID Team made this a driving issue for the analysis. Also see the "Features Common To All Alternatives" discussion in Chapter II, page II-4.

6. Other Wildlife

Oil and gas activity could affect wildlife habitat and the vulnerability of wildlife species.

The ID Team made this a driving issue for the analysis. See Chapter IV, pages 9-20 for a full discussion.

7. Wildlife Edge Effects and Habitat Fragmentation

Edge effects are not discussed because the Forest has a great deal of natural edge and fragmentation, and oil and gas activities would not cause a noticeable change.

8. Wildlife Corridors

The only wildlife corridor identified on the Beaverhead Forest is for the gray wolf. It will be discussed within the Biological Assessment (to be prepared for the Final EIS).

Elk migration routes are not discussed elsewhere in the EIS. Generally, elk migrate to and from winter ranges. In alternatives with Timing Limitations on winter ranges, the migration routes could be protected as well. Elk migration can be affected by new road construction, but is not as affected by the traffic on the road. All new oil and gas access roads will be constructed to allow for elk passage and can be restricted to oil and gas use only to limit activity if necessary. Standard Terms allow a wildcat site to be moved or delayed in start-up for a period to allow for wildlife migration. These considerations will be reviewed on a site specific basis once an Application for Permit to Drill is received.

9. Recreation Opportunity

Oil and gas activity could alter the sights and sounds of the Beaverhead National Forest. These altered sights and sounds could affect the recreational experience of visitors to the Forest.

The ID Team made this a driving issue for the analysis. See Chapter IV, pages 52-68 for a full discussion.

10. Noise effect on humans and animals

Noise is considered within the wildlife, and recreation and aesthetics issues, both driving issues for the analysis.

11. The lease locations should be mapped by a visual resources expert and impacts to the visual resources should be described from all vantage points. Impacts in the form of differences in line, shape, size and coloration of the road, pads and associated facilities, and loss of native vegetation should be presented.

Scenic resources of the Forest are described in Chapter III as is the method of analysis. The effects of oil and gas exploration on these scenic resources are disclosed in Chapter IV. The recreation and aesthetics issue is a driving issue for the analysis.

12. The EPA believes that an accurate description of the water resource is essential to understanding the potential effects of the availability and lease decisions. This should include water quality, beneficial uses, and the presence of TES species and their habitat. Presenting this information on a third order drainage level would be most useful. A summary of this information enhances readability and serves as a quick reference for future analyses. The summary should include:

- Name of waterbody
- Length or size of waterbody
- State assigned beneficial use of waterbody
- Note whether the waterbody is currently meeting standards and its beneficial use
- Presence of any TES species
- Indicate whether the stream has particular importance as a spawning or nursery area
- Indicate what reference watersheds, from Forest Plan monitoring are used to correlate baseline information and/or effects analysis
- Information not available should be so indicated

Impacts to water quality from chemical contamination, sediment recruitment into waterways and erosion, must be analyzed.

The existing condition of watersheds is described in Chapter III. The effects of oil and gas exploration and production on soil and water quality is a driving issue for the analysis. See Chapter IV for a full discussion of effects.

13. Soil and Slope Considerations

Oil and gas activity could create soil disturbance such as compaction, displacement, contamination, and loss of vegetative cover resulting in erosion. The ID Team made soil and water quality a driving issue for the analysis. The chart on page II-14 describes the various stipulations applied to sensitive soils and slopes. The effects of these stipulations are disclosed in Chapter IV, pages 20-40.

14. Impacts to wetlands should be identified, along with specific descriptions of the functional wetland values impacts and potential sites for mitigation. Functional values include groundwater recharge, wildlife habitat, and sediment and nutrient trapping/filtering. Mitigation measures and monitoring plans should be detailed. Potential impacts to streams and fisheries should be fully documented.

Any activity proposed within riparian corridors or in the vicinity of springs, lakes and wetlands should be examined with respect to effects on these areas including water quality, sedimentation, fisheries, vegetation removal and wildlife.

Riparian areas are described under both Hydrology and Fisheries, Chapter III. The effects of oil and gas activity on riparian areas and fish habitat are disclosed in Chapter IV. Mitigation measures are found in the Chapter II descriptions of alternatives, in the Chapter IV discussion of effects, and in Appendix F, Conditions of Approval.

15. The DEIS should examine potential impacts to air quality as a result of any exploration and reasonably foreseeable development and production activities, including fugitive dust and hydrogen sulfide pollution.

Identify air classifications (PSD classes), existing air quality condition (attainment or non-attainment), and regulatory standards. Discuss the potential effects to the airshed with the OGAS.

Existing air quality is described in Chapter III of the Draft EIS. The effects of oil and gas exploration and development on air quality are disclosed in Chapter IV.

16. A survey of cultural, historic, and archaeological resources should be conducted as part of the DEIS. Leasing should not occur in areas with significant cultural resources.

We would like to suggest that potential historic districts and cultural resource landscapes be identified or updated as definite bounded areas within which future inventory and compliance needs can be rapidly assessed as interest in those potential lease areas develops, but prior to actual exploration or road expansion.

Through literature searches and field work we have identified approximately 20 mining districts on the Forest. These mining districts have been plotted on a Forest travel plan map. This is a preliminary mapping effort. As district boundaries are ground-truthed their precise locations will doubtless change. Others may be identified with ongoing research. As mining districts are confirmed through field work they will be transferred to appropriate quad maps and added to our electronic data base. As Chapter III notes, we have identified only one archeological district on the Forest. Analytical field surveys planned for the future may delineate other archeological and historic districts.

Known cultural resources are discussed in Chapter III.

Prior to leasing, parcels containing known heritage resources which require protection will be identified, and potential lessees notified of the special considerations through a Lease Notice.

17. The EIS should discuss Native American treaty rights exercised in the area and historic and current uses of the area for ceremonial, medicinal or hunting purposes.

Such a discussion appears in Chapter III, under heritage resources.

18. Make early contact with representatives of the Flathead and Shoshone-Bannock tribes in order to solicit their aid in identifying Native American concerns which may include Traditional Cultural Properties or landscapes.

We contacted Indian tribes known to have used the Forest historically. These tribes are on the mailing lists for all information related to this project. Additionally, we have offered to meet with the Salish, Blackfeet, Shoshone-Bannock and Nez Perce tribes to discuss the project. We met with the Salish-Kootenai Cultural Committee in March of 1994 to discuss their feelings about the proposal.

19. A comprehensive analysis of the socio-economic benefits of oil and gas development ac-

tivities in the area should be included in the review. A chart which represents costs of administering the mineral program and industry's financial contributions to local, state and federal treasuries would also be appropriate.

The direct environmental impacts associated with oil and gas development such as wildlife displacement, impacts to fisheries, and visual intrusions, should be analyzed as to their implications for the recreation and tourism based economies of the area.

Additionally, the DEIS should examine potential socio-economic impacts to the area due to increased demand for infrastructure services and increased population associated with any future oil development and production.

The Forest Service needs to look at effects stipulations place on Oil and Gas exploration opportunities.

Social and economic impacts of oil and gas activities are disclosed in a report located in the project file. This lengthy document is summarized in Chapter IV at pages 80-85 and in Chapter II at page 21, and is available for review upon request.

20. Purpose and Need.

Several comments questioned the need for the analysis. It is stated in Chapter I.

21. No areas should be completely excluded from oil and gas leasing without adequate justification. Conflicting resource values or uses does not constitute adequate justification.

The alternatives contain a range of stipulations applied to Forest lands. Each time a special stipulation is applied, its use is justified. Special stipulations are discussed further in Appendix G, Waivers, Exceptions, and Modifications.

22. The lack of potential or lack of current industry interest should not be considered a basis for closing lands or imposing constraints on future development.

Oil and gas occurrence potential or industry interest are not reasons for any of our special stipulations.

23. If surface resources are important enough to require a blanket NSO stipulation, the area should not be leased in the first place. The DEIS

should include useful, informative maps. (see page 4 of Wilderness Society letter.)

Three areas listed under "CSU" should be moved to the category of NSO. They are: 1) primitive and semi-primitive recreation areas (MA 8), 2) Big game winter range, 3) river segments eligible for scenic and recreational status under the Wild and Scenic Rivers Act. Surface occupancy will degrade their usefulness to their purposes.

I think a 5 mile buffer zone should be placed around existing wilderness areas and wilderness study areas so that they can remain just that - WILDERNESS!

We urge you to withdraw all the areas you have listed under NSO, TL, and CSU categories/decisions which are referenced under the forest plan "proposed action". We urge you to withdraw all roadless areas plus important migration routes and wildlife travel corridors from all oil and gas leasing activities as well as all lands within a ½ mile on either side of forest system trails.

No new roads.

The lands mentioned are treated differently under the different alternatives. The DEIS will identify a preferred alternative that may or may not agree with these suggestions. See Table II-4, on Page II-13 of Chapter II for full disclosure of stipulations as they apply to different alternatives.

24. The FS should explain the degree of resource protection afforded by any special, restrictive stipulations that be may imposed as a part of this proposal. These stipulations should be explicit, with a complete analysis of their purpose and adverse effects to the area's resources should they be violated.

Imposition of NSO or other highly restrictive stipulations in areas where it cannot be definitively shown that oil and gas exploration and production activities would result in a significant irretrievable loss of surface resources must be avoided. Discussion of the specific requirements of a resource to be safeguarded, along with perceived conflicts between it and oil and gas activities, must be given.

All surface disturbing activities, and any related constraints, must be evaluated in conjunction with reasonable and available mitigation measures.

The DEIS should include measures to mitigate the impacts of the proposed activities on any and all of the affected natural resources as listed in this letter.

We believe it is necessary to discuss other types of mitigation which may be utilized at the time of oil and gas drilling, both exploration and development, such as area-wide standards and guidelines for oil and gas operations. This information is of paramount importance because it illustrates that with appropriate mitigation, oil and gas activities are compatible with other resource uses, including those in sensitive areas.

The Interdisciplinary Team analyzed a range of alternatives exploring the effects of different surface management strategies. The effectiveness of proposed mitigations and stipulations is analyzed and disclosed in Chapter IV. Special stipulations are justified each time they are applied. Special stipulations are discussed further in Appendix G, Waivers, Exceptions, and Modifications.

25. The FS must look carefully at the effects of surface resource management on oil and gas exploration and development, and ensure that the least restrictive stipulations necessary be used to protect the resources.

The Interdisciplinary Team analyzed a full range of alternatives to explore the effects of different surface management strategies. The Chapter IV disclosure of effects and Chapter II Comparison of Alternatives illustrate the effects of the different strategies. These effects are the basis for deciding which stipulations will be necessary to adequately protect the resources.

26. A process for environmental review and public involvement prior to waiving or modifying any stipulation should be outlined in the environmental analysis.

Waivers, exemptions, and modifications of special stipulations are discussed in Appendix G. "If the authorized officer determines, prior to lease issuance, a stipulation involves an issue of major concern, modification or waiver of the stipulation would be subject to public review (e.g., 43 CFR 3101.1-4)." (Appendix G, pages G-1, G-3, and G-5).

27. Wear and tear on the roads should be considered. Also, will oil and gas be charged for upkeep and replacement of roads and bridges?

A social/economic analysis has been prepared. It takes into account the existing infrastructures in the five county analysis area. Oil and gas activities are not charged directly for upkeep and replacement of roads and bridges, however, leasing contributes dollars to the US Treasury which are distributed back to the State of Montana. See Chapter IV, pages 80-85 and Chapter II, page 21 for a summary of the social/economic analysis.

28. All uses of the term "no potential" should be changed to read "no currently known potential" or deleted in their entirety.

The terms were changed to reflect this suggestion.

29. Historical oil and gas exploration and development impacts typical in the area, or in a similar area, should be considered in the reasonably foreseeable development analysis.

The two exploration wells that have been drilled on the Beaverhead Forest are briefly described in Chapter III and were considered in development of the RFD, as were the 39 wells drilled on other ownerships in the vicinity of the analysis area. See Appendix B for a pictorial description of the McKnight Canyon and Cornell Camp wellsites.

30. Baseline information should characterize the biological and physical environment sufficient to determine potential environmental impacts from which to develop mitigation measures, to provide a reference for subsequent monitoring, and to support the analysis of cumulative impacts. Resource information that is known for the analysis area should be displayed along with an indication of what information is lacking or incomplete. Analysis area boundaries for each resource should be clearly displayed along with rationale for their location. The EPA feels that the EIS should demonstrate how site specific information would be collected prior to ground disturbing activities as oil and gas development progresses.

The existing condition of Forest resources is described in Chapter III. The process we follow after receiving an Application for Permit to Drill is described in Appendix D.

31. Regarding the RFD, the EPA states:

- The RFD needs to be based on geologic information and other valid sources of information such as past activity, industry interest, etc. Technical infor-

mation should be presented in an Appendix with a summary of this information in the text of the EIS.

- Include a detailed discussion of the site-specific drilling program for the exploratory and production wells including casing, mud, cementing, and completion practices.

-Discuss production treatment facilities for product separation, produced water disposal methods, and related permit requirements.

-Address likely requirements for oil and gas product marketing transportation (i.e., road network and pipeline construction).

This information is found in the Reasonably Foreseeable Development Scenario (RFD), Appendix B. This suggestion was implemented.

32. The EIS should be very explicit in terms of describing the specific steps that will take place when the FS is asked to grant a lease. How will it proceed to assess the potential impacts of an exploratory well and any additional wells or facilities, in the event that a well is successful? Will there be a GIS system in place to provide the best information about potential impacts? To what extent will public concerns be considered when the FS weighs the relative merits of whether to allow drilling, road building, etc.? What safeguards will there be to ensure that all values of the Forest lands are considered before the FS forges ahead on exploratory drilling permits?

There will be no further NEPA analysis before leases are granted. The next NEPA analysis will be undertaken when we receive an Application for Permit to Drill (APD). The process we follow after receiving an APD is described in Appendix D.

A GIS system was used to conduct this analysis.

This document analyzes the effects of making lands available for leasing and the effects of various stipulations on those lands should we choose to lease them. Once a parcel of land is leased, the lessee has the right to explore on any areas leased with surface occupancy. Once an APD was received, a separate NEPA analysis would be conducted to make sure development on that parcel is within resource constraints and complies with all laws, regulations, and policies.

33. We believe the FS needs to specify in the planning documents if and how valid existing

rights could be impacted by the new leasing decision.

The DEIS needs to discuss if and how existing lease rights could be impacted by new leasing decisions, such as conditions of approval for operations, although existing lease rights cannot be changed by a new leasing decision.

Existing lease rights are discussed in Chapter I. "There is one current oil and gas lease on the Forest which encompasses 423.56 acres and is due to expire August 1, 1995. This area will be managed under its current lease until it expires, at which time its management will be dictated by any decision made as a result of this analysis."

34. Other suggestions follow:

Consideration should be given to mandate strict control of oil and gas production and exploratory

operations, in terms of pollution and removal of disabled equipment and waste products.

Weed Control

Site Rehabilitation

Strictly limit number of wells

Revoke any lease for even the smallest infraction of the law

Roads proposed for construction should be mapped and their relative location with respect to other roads - highways, secondary roads, and logging roads - accurately described.

These suggestions will be followed through our usual procedures for oil and gas activities and the analysis of their environmental effects.

Liz Bush, Arco Oil & Gas
 Balcron Oil
 Beaverhead County Commissioners
 Blackfeet Tribal Business
 Bureau of Land Management, Headwaters Resource Area
 Bureau of Land Management, Dillon Resource Area
 Confederated Salish and Kootenai Tribes
 Dillon Public Library
 Mansfield Library
 Butte-Silver Bow Public Library
 Carroll College Library
 Idaho State University Library
 Merrill Library
 Hearst Free Library
 Lewis & Clark Library
 Western Montana College Library
 Madison Valley Public Library
 Montana Native Plant Society
 Montana State Library
 Quinney Natural Resources Library
 Sheridan Public Library
 Social Science Library
 Twin Bridges Public Library
 MT. Dept. of Health & Env. Sciences
 Montana State University Library
 Colorado State University Library
 University of Montana Library
 Marathon Oil Company
 American Wildlands
 Friends of the Bitterroot
 Tom Parker
 Don Cox
 Clayton Huntley
 Great Plains Resources, Inc.
 Intergovernmental Clearing House, State Capitol
 Intergovernmental Review, State Clearinghouse
 Madison County Commissioners
 Meridian Oil Inc.
 Mineral Policy Center
 Montana Oil Journal
 Montana Wildlife Federation
 North American Resource Co.
 NRGDC
 USDI, Office of Environmental Affairs
 EPA, Office of Federal Activities
 Shoshone Business Council
 The Wilderness Society
 US EPA Montana Office, EIS Review
 US EPA Montana Office, Forest Service Liason
 USDA Forest Service, Washington Office
 USDA/Forest Service, Deerlodge NF
 Jim Albano, Bureau of Land Management
 Don Bachman
 Mike Bader, Alliance for the Wild Rockies
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 Marcus Greenough
 Douglas Hansen, Loma Energy Corporation
 Bernard Harkness, YA Bar Livestock
 Glenn Hockett
 William B. Horn, C.P.A.
 Rick Hughes, Chevron USA, Inc.
 Neil Hunsaker
 Jim Jensen, Montana Environmental Info Ctr
 Jeff Juel, The Ecology Center
 Jack Kirkley
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 Jerry Klem
 Bart Koehler, Greater Yellowstone Coalition
 Bill Koehnke
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 Michael C. Kossow, Meadowbrook Conservation Assoc.
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 Bureau of Land Management, Great Falls Resource Area
 Ed Marker, Petroleum Info Corp.
 Glenn Marx, Office of the Governor
 Heidi McIntosh
 John McKay, Bureau of Land Management
 Margret Melly, Vastar Resource Inc.
 John Neisbitt
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 James Osbourne, Shoshone/Bannack Tribal Council
 Samuel N. Penny, Nez Perce Tribal Executive Committee
 Joel Peterson, MT Dept of Fish, Wildf & Parks
 Frank R. Primozic
 David Richerson
 Edward T. Ruppel, Director & State Geologist
 Pauline E. Semmens
 R.H. Simms, Jr., Marathon Oil Company
 Will Snider, Alliance for the Wild Rockies
 Mike Snyder, USDI/National Park Service
 E.D. Stroops
 Lionel Treepanier
 Gary Warfield, Bureau of Land Management
 Janet Watson, Powers Elevation Co., Inc.
 Stan Wilmoth, State Historic Preservation Society
 James R. Wolf, Continental Divide Trail Society
 Tom Younggren
 Diana Yupe, Shoshone-Bannack Tribes