

Box 53

Boulder, Wyoming 82923

April 3, 1972

RECEIVED

APR 14 1972

OFFICE OF
TENO RONCALIO

The Hon. Teno Roncalio
House of Representatives
1314 Longworth House Office Building
Washington, D.C. 20515

Dear Mr. Roncalio:

Thank you for your encouraging letter of March 20 replying to my comments on the Wagon Wheel Project.

I am enclosing a copy of the official comments of the Sublette County Wagon Wheel Information Committee. I am also enclosing copies of letters I have written to Mr. Ruckelshaus, Administrator of the Environmental Protection Agency, and to Mr. Dubois, the Deputy Regional Administrator of the EPA at Denver.

In your letter of March 20, you mentioned that you had forwarded my letter to Chairman Schlesinger of the AEC.

Have you ever heard from him? I have not. I have written him directly and am enclosing a copy of my letter to him. If he ignores both the letter you forwarded for me, and this second letter, may I count on your inquiring the reason of him?

I wish to thank you personally for being the only Wyoming official to date who has shown any genuine concern for the welfare of Sublette County residents.

Sincerely,
Mary Ann Steele

COMMENTS ON THE DRAFT ENVIRONMENTAL STATEMENT FOR THE WAGON WHEEL GAS STIMULATION PROJECT, SUBLETTE COUNTY, WYOMING, JANUARY, 1972 -- by the Sublette County Wagon Wheel Information Committee, March 27, 1972

"Environmental Statement" is a good description of this publication. It is a whole series of statements which are backed up by little or no supporting evidence. It ignores whole facets of the local land and economy. It is dangerously vague on a number of crucial points.

In this Environmental Statement, we are assured that:

"The signing of an execution contract between the Government (AEC) and the industrial sponsor (EPNG) for the experiment is dependent on many factors, including comments received on this environmental statement." (p. 9.1)

Therefore, as citizens of the United States and residents of the County which will be most affected, we submit these comments for consideration:

1. Nature of the Project

In the Wagon Wheel experiment, set for the Fall of 1973, five-100 kiloton nuclear devices will be exploded sequentially, a few minutes apart, in a single wellbore, to determine whether nuclear stimulation of natural gas reservoirs is a practical means of developing commercial production from the Pinedale Unit in particular, and the Rocky Mountain states in general. (p. 2.5)

The Pinedale Unit comprises some 90,000 acres (almost 200 square miles) of Federal, State of Wyoming, and fee oil and gas leases held by El Paso Natural Gas Company, Mountain Fuel Supply Company, and Hondo Oil and Gas Company. (p. A.1)

2. Ground Motion Effects

It is stated that:

"A comprehensive inventory has been made of residential and commercial structures within a 20-mile radius of the emplacement well (Figure 3-6) and extensive survey of structures have been made to 100 miles." (p. 3.5)

We fail to see how a comprehensive inventory can have been made, when none of the Boulder residents or ranchers, ten miles from the blast, or Pinedale residents, eighteen miles from the blast, have been contacted for a discussion of damage to their homes, outbuildings, or commercial property. One El Paso employee went around last summer, accompanied by two men from the University of Wyoming, and they took pictures of water wells. They asked well depths, but never looked at well logs. In many cases they did not know the names of the homeowners whose property they visited, nor did they ask if the persons to whom they spoke were the owners.

It is further stated:

"In the Wagon Wheel experiment, preliminary indications are that the sequential detonation of five 100-kiloton explosives may cause architectural damage such as masonry and plaster cracking to about 200-400 residential, public, and commercial structures and associated outbuildings and for which repair costs could be about \$65,000. The seismic susceptibility of individual major facilities (i.e., dams and bridges) is currently being evaluated, and agreements with owners regard-

ing precautionary measures, compensation for loss and potential repair are being negotiated on an individual basis." (p. 9.4)

However, El Paso arrived at this \$65,000 figure by "utilizing a statistical method" (p. 3.5) not by consultation with the owners.

The 200 to 400 residential, public, and commercial structures include three dams together with reservoirs (p. 3.12) and a six-span highway bridge (p. 3.6) By simple division, one can see that this amounts to \$162 to \$325 a structure. This trifling amount would not replace broken windows, or repair cracks in plaster, walls, or foundations in most homes, much less repair damage to dams and bridges.

Furthermore, the report completely ignores the complex Boulder Irrigation District, a facility comprising not only the Boulder Dam, reservoir, and canal system, but also various features such as siphons, spillways, headgates, culverts, etc., all of which represent a large investment. This Boulder Irrigation System is owned and is being paid for over a fifty-year period by the Boulder ranchers.

The Environmental Statement also ignores the Boulder Fish Rearing Station, a Game and Fish Department installation. The Game and Fish Department estimates the current value of this station at a quarter of a million dollars.

To quote further:

"The proposed plan for Project Wagon Wheel is to detonate the five-100 kiloton explosives sequentially within a single wellbore." (p. 2.5)

It is planned to do this in the Fall of 1973.

However, in the Draft Environmental Statement of the Rio Blanco Gas Stimulation Project, Rio Blanco County, Colorado, also published in January, 1972, there is this statement:

"The only present technique for using multiple nuclear explosives in a single wellbore is to detonate all the explosives simultaneously... a sequential firing system for multiple explosives should be developed within the next several years." (p. 56)

The project engineers do not even know how to do this yet, but they are moving from the 30 kiloton simultaneously exploded Rio Blanco devices to the five 100 kiloton sequential blasts in the Green River Basin, "in which there is no nuclear explosion experience." (p. 3.5) How can they be sure that the blasts will be sequential? What would be the additional dangers of venting, seepage, and seismic shock if the devices did all explode simultaneously?

As it is, there will be a Richter magnitude 5 body wave for each of the five detonations.(p. 3.15) This is a considerable seismic shock.

With regard to the total number of wells to be stimulated, if the field is developed, the Environmental Statement contains two flatly contradictory paragraphs:

" If the Wagon Wheel experiment is successfully conducted in the Fall of 1973, EPNG estimates that production from a 25 well development within the 13,551 acre participating area...could be started in 1977...the maximum number of wells to be stimulated in any one year would be in the range of five to seven. Additional drilling would be initiated and ...

it may be possible to complete in excess of 100 wells with nuclear stimulation within the Unit and adjacent areas." (p. 2.6)

Take special note of this "and adjacent areas":

On page 9.2 there is this statement, however:

"The aggregate total of the gas sales contracts and associated increments of development might consist of stimulation of 10 wells in 1977, 20 in 1978, with a continuing increase of 10 wells per year to a peak of 50 wells per year for several years and then slowly decline."
(p. 9.2)

So as not to inconvenience the local residents, the following plan is proposed:

"It would be annoying to the local residents to have their activities disrupted every few days because of detonations, so particular care should be taken with scheduling. From this consideration has come a field development concept based on multiple well stimulations in a single day. The detonations could be fired a few minutes or more apart and continue until all explosions are completed. (p. 9.5)

Does the AEC and El Paso intend to rebuild our homes, outbuildings, dams, bridges, irrigation system, fish rearing station, etc., once a year for twenty years? Do they still expect "minimal damage" on this yearly nuclear stimulation day? As they get to within four miles of the town of Pinedale, with its 950 people, do they still anticipate "modest environmental costs"?

3. Release of Radioactivity

To quote again from the Environmental Statement:

"Current plans for the production testing phase of the Wagon Wheel experiment call for the intermittent release of some 2½ billion standard cubic feet of gas over a period of about 325 days. (p. 3.17)

"It is likely that as much as three billion standard cubic feet (BSCF) will be flared (burned) during the testing." (p. 2.10)

We are assured that this "planned release of radioactive gases", (p. 3.16) in which tritium (radioactive hydrogen) in the form of CH₃T, HT, and tritiated water, HTO, as well as Krypton-85 and Argon-37, will pass into the atmosphere, will cause such a low-level increase in radioactivity that it will do no harm. To the project sponsors, low-level quantities of radiation are a "non-quantifiable risk." (p. 2.10)

However, an ever-growing number of scientists and medical men believe that any increase in radiation levels is harmful. Also, we are faced with possible development of vast gas fields all over the Rocky Mountain area by nuclear stimulation. Over a long period of time these low levels assuredly would keep rising.

The following is a quote from a recent book by Dr. Arthur R. Tamplin and Dr. John W. Gofman, research associates at Lawrence Radiation Laboratory, Livermore, California:

"The statutory allowable dose to the population-at-large in the USA is 0.17 rads per year from peaceful uses of atomic energy in all forms. If everyone in the population were to receive 0.17 rads per year from birth to age 30 years, the integrated exposure (above background) would be five rads per person. If the risk for all forms of cancer plus leukemia is an increase of 2% in incidence per rad, we have 5x2= 10% increase in incidence rate for all forms of cancer plus leukemia per year for a population of two

hundred million persons in the U.S.A., and this estimate does not even credit the much greater sensitivity to cancer induction of the radiated child or infant in utero. Our estimate of 32,000 extra cancers plus leukemia [per year] is probably too low as a result of not taking the child's sensitivity into account...it seems to us that this alone is rather a high price to consider as being compatible with the benefits to be derived from "orderly development of atomic energy" *

The risks to the public from flaring the gas is justified by El Paso's economic considerations: "alternatives such as storage of natural gas or its controlled combustion and storage of its combustible residue, would more than double the cost of the Wagon Wheel Experiment." (p. 4.1) We, the public, refuse to take this risk for El Paso's benefit!

The following statement is also made:

"The potential dose from food ingestion depends upon the particular food chain under consideration; in the western Wyoming region, the forage-cow-milk food chain would produce the major contribution to the potential dose delivered to the critical population. (young children drinking tritium-contaminated milk) If it were necessary, the potential exposure to radiation via this pathway could be lowered significantly by supplying the milk cows with uncontaminated feed, or eliminated entirely by shipping in uncontaminated milk. Another significant contribution to the total potential dose is from the pasture-meat pathway (for cattle grazing on plants exposed to tritium). This dose could be minimized by using uncontaminated dry feed. (p. 3.21)

If this flaring continues over a 325 day period, who is going to pay for all this uncontaminated dry feed? If the ranchers will have to supply it on their own, most of them absolutely could not afford it. If the AEC and El Paso pay for it, where are we supposed to put our cows? We harvest the hay off our meadows in the summer, and the cows are put out to pasture on the national forest or BLM lands. We pay a stiff grazing fee to the federal government for this pasture. What is our new hay crop is contaminated? Will we be paid for dry feed for two years?

What if cattle buyers won't purchase our meat, or creameries our cream, because they won't risk possible contamination of milk or meat? What reimbursement could there be for ruining our livelihood?

Of what does the "appropriate monitoring" (p. 1.2) of radioactivity consist? Will they monitor air, earth, water, grass, milk, and meat? How often? How thoroughly? Over how wide an area? Who will do it? Will the results be made public?

If contamination of meat or cream is greater than was predicted, what is the possibility of our cattle being quarantined by the Federal Food and Drug Administration, especially as a good part of our beef and cream is shipped across state lines? What if a ban is placed on hunting and fishing for several years for the same reason?

*Tamplin and Gofman, Population Control Through Nuclear Pollution, Nelson Hall Company, Chicago, 1970, p. 18-19.

Will the fish and wild game be monitored? Wild game includes antelope, deer, elk, moose, cottontail and sage grouse. Much of this meat and fish is consumed by local and out of state hunters. What compensation will there be for outfitters and guides, whose hunting and fishing clients refuse to come to an area where there is possible radioactive contamination?

Problems to outfitters are dismissed as follows:

"Considerable hunting of elk, deer and moose takes place in Sublette County; however, areas of heavy hunter concentration appear to be on the outskirts of a twenty mile radius around the Wagon Wheel site." (p. 24)

It is obvious that little research was done in regard to big game. The antelope and deer do not stay in one place, according to the local big game biologist, but traverse this entire area, and County, in their nomadic grazing patterns, numbering into the thousands at certain times of the year. By no means do the antelope and deer consider the area surrounding Wagon Wheel "off limits". Contact with the local Game and Fish Department proved that no contact had been made with that office concerning any kind of study on big game in relation to the Wagon Wheel Project. When asked if it was possible to have contamination occur in these species, if the radioactive tritium were present in the sagebrush in the area in which they were grazing, the *biologists* reply was that it was possible to contaminate every antelope and deer in Sublette County, because at one time or another, they all pass through this area. It is well to remember, too, that the wildlife nurse their young, and cannot be dry fed as was suggested for the cattle of the area, nor can we dispose of their milk. (p. 3.21)

For the benefit of local residents reading these comments, the map of the twenty-mile radius included in the Environmental Draft Statement is reproduced.

The possibility of accidental seepage of radioactive material from the cemented region around the casing of the emplacement hole is discussed, and the possibility pronounced to be "extremely remote" (p. 5.3). The statement continues:

"If seepage were to occur, the radioactive effluent would consist of tritium, some noble gases and perhaps some radioiodines. Only the radioiodines and noble gases are of concern, since the biological effect of the tritium will be insignificant by comparison. The long-lived krypton-85 would be of little biological concern. Radioiodines readily enter the forage-cow-milk food pathway (the most critical path) and once ingested by a human being, accumulate in the thyroid." (p. 5.4)

In a report prepared by Dr. Peter Metzger, Dr. Robert Williams, and Dr. Edward Martell for the Colorado Committee for Environmental Information (July 28, 1969) there is this observation regarding krypton-85 which the Environmental Statement considers "of little biological concern":

"Although krypton-85 does not concentrate in body tissues, it nevertheless exposes one to external and internal radiation, and a certain amount can become dissolved in body fluids. What is particularly alarming about krypton-85 are the long range implications of its continuous addition to the atmosphere. Krypton-85 from various sources is being added to the environment at such a high rate that in the absence of corrective measures it will soon be the major atmospheric radioactive contaminant. One significant source of krypton-85 comes from the chemical plants which reprocess the spent fuel from nuclear power plants. It is estimated that these chemical reprocessing plants alone, will have raised the

concentration of all radioactivity in the air globally by 2% by the next 30 years...this is a significant increase, since radiation induced diseases are believed to be directly related to radiation dose." (p. 2-3)

There is no mention in the Environmental Statement of whether these 100 kiloton explosives will be fission or fusion type. We understand from discussions, that members of the Wagon Wheel Information Committee have had with El Paso and AEC representatives, that it will be a fission type device. Therefore, strontium-90 and cesium-137 isotopes will be among the "remaining radioactivity" in the cavity which will be "permanently incorporated" in the five zones of resolidified rock and the chimney region. (p. 3.25)

No contamination of underground water is expected, although it is stated that:

"The interval from the surface to 7,200 feet contains innumerable aquifers. Generally, fresh waters occur to a depth of 3,730 feet, with saline waters from this depth to 5,630 feet; subpotable, or near potable, water is present from 5,630 feet to 7,200 feet." (p. A.10)

But, what after 500 to 2,000 nuclear blasts have been set off to develop the field, (depending on which of the two conflicting statements on wells per year, and total number of wells one uses) and 500 to 2,000 deposits of strontium-90 and cesium-137 etc., are located all over the unit? These isotopes have long half lives and are two of the most biologically dangerous isotopes known. Might not new fracturing cause networks of fractures to form among these older zones? How can the project sponsors be so sure that there will never be any contamination of underground water if the field is developed?

What will be the end "benefit" of all these risks? The gas produced will be radioactive. This contaminated gas will be diluted with uncontaminated gas for shipment to customers. It is reasonable to assume that it will be added to major pipelines. The argument is advanced that:

"The environmental impact of using gas that contains small amounts of tritium will have to be weighed against not having the gas available to augment the Nation's energy resources." (p.9.4)

Surely, the people in those states which would receive the contaminated gas should be allowed to vote on whether this particular risk is worth the benefit to them?

4. Effects on Fish and Wildlife

Nowhere in the text or references of the Environmental Statement is there any indication that a comprehensive study has been made of the impact of seismic shock and radioactive contamination on the fish, wildlife, vegetation or ecological systems in the area of the blast or the areas which will receive fallout from flaring. There is the flat statement, "with respect to animal life, there appears to be no danger even near the emplacement well." (p. 3.13) There is a list of some of the species found in the area, but "no harm to any of these species is expected due to the remoteness of their normal habitat from the site." (p. A-12) Absolutely, no evidence supporting these statements is given.

Attached to these comments is a letter stating the views of the Wyoming State Game and Fish Commissioner, regarding the Environmental Statement.

5. The Effect on Population of the Area

In July of 1971, Congressman Teno Roncalio made public a letter he had received from Sam Smith of El Paso Gas Company, answering questions Mr. Roncalio had put to John S. Kelly, Assistant Director for Peaceful Nuclear Explosives, Division of Applied Technology of the Atomic Energy Commission. This letter was published in the Pinedale Roundup on July 15, 1971.

Mr. Smith uses figures from the wells-per-year estimate of p. 9.2 in the Environmental Draft Statement. Mr. Smith estimates that:

"This peak rate of development would provide direct employment for 1500 to 2000 people. Assuming that three additional jobs are created in the service industries and that each employed person supports two others, leads to a conclusion that during the early 1980's, field development and operation could support a local population in the vicinity of 15 to 20 thousand people-several times the present population of the Green River Basin- and involve investment at a rate of about 200 million dollars per year. "

Now, this is toned down in the Environmental Draft Statement, where all that is said is that "Long-term employment associated with full field development would involve about 1500 - 2000 direct gas industry employees." (p. 9.6) But, the report goes on to say that at present, there are not the housing, commercial, and recreational facilities available for this large increase in population (p. 9.3) and this factor, plus that of population, could prove "an overriding consideration" and thus, "recovery of the resource may call for the earliest possible development schedule". (p. 9.5) But if these facilities are constructed "in areas where ground motion from future detonations may cause substantial damage, such future developments may be limited." (p. 9.3)

What all this means is that they are in a hurry to get in and get out quickly while the local population is still small (and outraged objectors are few). In an article in the Casper Star-Tribune on February 14, 1972, Dr. Philip Randolph of El Paso Natural Gas Company is quoted as saying that the work force of 1500 to 2000 people on the Wagon Wheel project would be housed in the Rock Springs area, seventy-five miles away from the project site. Therefore, only the old long-time County residents will suffer the continual damage and the risks of fallout, we must assume.

6. Cost to U. S. Taxpayers

In testimony presented at the public hearings on the Rio Blanco, Colorado, nuclear gas stimulation project, on March 27, 1972, by Dr. David M. Evans, representing the Colorado Open Space Council and the Denver Audubon Society, it was pointed out that "the damage claims paid for the damage for one 40-kiloton bomb blast at Rulison, exceeded \$125,000. All but \$10,000 of this was paid by the U. S. Government. (taxpayers)."

The people of the Rulison area had been assured, also, that the damage would be "minimal"; but according to the Denver Post (April 26, 1970) "the damage has been severe, widespread, and may continue for months or years." This Denver Post article also noted that the "advance good humor men" from Austral Oil Company donated \$5,000 to a Rifle school improvement fund, and made offers of expense-paid visits to Houston or Las Vegas for key local people. But, after the blast, the claims adjusters refused to pay the full amount of most of the claims, and treated the people "like yokels". Undoubtedly, the \$125,000 figure would have been considerably higher had the people been fairly paid.

The softening-up process began in Wyoming, on April 6, 1970, when fifty members of the Wyoming legislature were flown to Las Vegas, Nevada, by the AEC and the Wyoming National Guard, and taken on a tour of the Nevada Test Site. Conversations which members of our Committee have had with El Paso officials indicate that the campaign to soften up the local Sublette County residents is about to be intensified.

What has been the cost to the public of these gas stimulation projects to date? What will be the ultimate total cost to the public? How much of the cost for the damage claims that will be paid in Sublette County if this blast goes off as planned in the Fall of 1973 will be picked up by the AEC? How much will the cost of these "experiments" be reflected in increased gas prices to consumers? Who will pay the huge annual damage claims for twenty years if the Pinedale Unit is developed?

Have not the U. S. taxpayers a right to be given a financial report on how their money is being spent by the AEC and exactly how this spending has benefited these taxpayers to date?

7. Summary and Conclusion

In view of the fact that:

- (a.) It is very likely that the seismic shock and resultant damage from the Wagon Wheel experiment will be greater than predicted;
- (b.) There is no adequate guarantee of complete compensation for damages;
- (c.) The risk of contamination of range lands, in any degree, from flaring, is totally unacceptable to us;
- (d.) The risk of contamination of underground water or of surface water, however small this risk may or may not be, is totally unacceptable to us;
- (e.) Admissions are made in the Environmental Draft Statement that accidents, such as seepage and venting, have occurred in earlier blasts, (p. 5.1) and that the technology for this experiment has not even been completely worked out yet. We see no benefit worth risking such accidents;
- (f.) There has been no comprehensive study on the impact of this project on fish and wildlife and on local ecological systems;
- (g.) There has been no comprehensive study of the long range effects that development of this 90,000 acre Pinedale Unit, as now planned, would have on the local economy, in areas such as recreation, ranching, business and community services;

we oppose the Wagon Wheel experiment and development of the Pinedale Unit by nuclear stimulation.

Why should the people of Sublette County be expected to take all these risks, plus the mental stress of disruption of their daily life and uncertainty regarding the future of their communities, for the benefit of El Paso Natural Gas Company and a few local people having vested interests in gas or property adjoining the unit which they hope to have developed?

We feel that development of this field can wait until alternative methods for stimulating production can be worked out that involve no long term hazards, such as radiation pollution, or short term ones, such as yearly seismic stimulation days.

We hope that these comments will help to prevent exploitation of the people of Sublette County by a combination of El Paso Natural Gas Company and the Atomic Energy Commission--exploitation made possible in this country, today, because of the growing trend towards government by departmental regulation and bureaucratic decree.

Wagon Wheel Information Committee

HARRY C. BARKER, JR., Pres., Moose
RONALD C. BAYFORD, Vice Pres., Lusk
CHARLES M. CROWELL, Casper
HARRY A. DeBOLT, Torrington
WILLIAM R. KRUEGER, Greybull
LEE MANKIN, Gillette
DAVID NELSON, Kemmerer

State of Wyoming



JAMES B. WHITE
State Game and Fish Commissioner
PAUL M. THOMAS
Assistant State Game and Fish Commissioner
HOWARD W. DRAYNOR
State Game Warden
W. DONALD DEXTER
State Fish Warden
EVA M. SOZAN
Chief, Fiscal Division
GEORGE A. KAMINSKI
Chief I. & E.
CHESTER C. ANDERSON
Chief Research & Development

GAME AND FISH COMMISSION CHEYENNE 82001

March 9, 1972

Mr. Keith Osborn
State Planning Coordinator
Executive Department
State Capitol Building
Cheyenne, Wyoming

*Comments of the Wyoming
Game and Fish Commission
on this Environmental Statement*

Dear Keith:

In compliance with your request of February 3, 1972, the Draft Environmental Statement covering the Wagon Wheel Gas Stimulation Project in Sublette County, Wyoming, has been reviewed by our Staff, and the following comments are offered in the interest of fish and wildlife.

Sections of the statement which relate to fish and wildlife are wholly inadequate and clearly reflect the absence of wildlife and ecological expertise on the evaluation staff. Considerations given to the impact on fish and wildlife and the economics of these resources has been grossly understated.

Background and Description:

Stated justification for the Wagon Wheel Project and other similar projects of the series is the experimental value of the activity toward relieving an impending fuel and energy shortage with increased natural gas production pending technological development of other sources of fuel and energy.

The experimental nature of the project which is used to justify expenditure of natural resources, i.e., 2 1/2-3 BSCF of natural gas should also justify expenditure of project funds to determine the probable impact on fish and wildlife resources. This should include extensive evaluation of short term and long term impacts of the project as well as ancillary construction and other related development. A sophisticated monitoring program should be devised to determine these impacts during the experiment and for a prolonged period of time thereafter.

Specific references to the impact on fish and wildlife are as follows:

Section 3, Pg. 3.13, "With respect to animal life, there appears to be no danger even near the emplacement well".

No justification or rationale is offered for this particular statement.

Mr. Keith Osborn

March 9, 1972

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During certain periods of development trout eggs are extremely fragile. Concussion resulting from the detonation of explosive devices has been known to cause extensive mortality of naturally spawned eggs. If the Wagon Wheel blast occurs during the spawning period, either spring or fall, mortality of eggs in the spawning gravels could be of significance in self sustaining trout fisheries. Losses could result in fish eggs held in the Boulder Hatchery.

The report suggests that should a fissure develop to vent radio activity, this might be harmful to children through milk contamination. A suggested remedy is to import uncontaminated milk for humans and feed for livestock. What remedy is suggested for fish and wildlife during this period? The same question remains unanswered during the flaring period as far as free roaming wildlife is concerned.

There has been no biological or ecological input by the Wyoming Game and Fish Department to this report and there has been no request for same from the original agency, the contractor, nor the representatives.

In the Appendix:

Pg. A-12, under the heading of "WILDLIFE".

There is a general recognition of the existence of several species of wildlife, including five species generally recognized as rare and endangered. None of this information was solicited from nor furnished by the Wyoming Game and Fish Department as the legally responsible agency. The test site is in no way remote from the normal habitat of these species and it is impossible for us as wildlife managers to understand how no harm to any of these species could be expected. In any event, no precautionary or protective measures are suggested to provide for these species.

Pg. A-15, under "RECREATION".

Hunting and fishing are indicated among other recreational activities that are of significance. Again, this information was not solicited from nor furnished by the legally responsible regulating agency. All comments in this paragraph are far too cursory to even partially reflect the true economic and recreational significance of the wildlife and the recreation it affords in this area.

The only credited reference authority to the fish and wildlife resource is an economic report (References* A-7), which does not offer any significant biological or ecological information needed to determine the environmental impact on fish and wildlife of the proposed project. The publication referred to was dated 1966 and contained information through 1965. More recent and better reference is now available.

Mr. Keith Osborn

March 9, 1972

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A suggested corrective action would be a required consultation by the lead agency preparing the impact statement with the state agency legally responsible for administering the fish and wildlife resource, the Federal agency responsible for administering the Fish and Wildlife Coordination Act on Federal lands, and the public land managing agencies responsible for fish and wildlife habitat.

We feel the report should contain a positive statement informing the public that El Paso Natural Gas cannot be held liable by the public for any accidents in accordance with their contract with A. E. C.

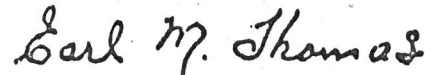
Section IX - HATCHERY BLUFFS of the Dames and Moore Report estimates present day replacement costs of the residences and facilities at the Boulder Hatchery to be \$100,000.00. This figure is preposterous in view of the fact that these facilities, based on actual costs dating back to 1948, cost approximately \$185,000.00. This fact was reported by letter from State Fish Warden Donald Dexter to Mr. Philip Randolph of El Paso Natural Gas Company. Any present day replacement would most assuredly cost one-quarter million dollars.

Limited mitigation is provided for possible damage to structures and improvements, however, no provision is made for destruction of or waste of other natural resources.

Thanking you for the opportunity to comment on the Environmental Impact Statement, I remain,

Sincerely,


James B. White
State Game and Fish Commissioner

By: 
Earl M. Thomas, Assistant
State Game and Fish Commissioner

*Section II, References, P. 11.4

T. H. Walther and J. W. Birch, Hunting and Fishing -- What it Means to Wyoming
Paper No. 73, 1966 Wyoming Game and Fish Commission

Box 53
Boulder, Wyoming 82923
April 3, 1972

Mr. James R. Schlesinger, Chairman
Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Schlesinger:

I have been informed by Congressman Teno Roncalio of Wyoming that he forwarded to you a letter I had written him on March 12, 1972, stating my feelings regarding the AEC Plowshare Project Wagon Wheel planned for the fall of 1973 in Sublette County, Wyoming. Since I have had no word from you, I am taking the liberty of writing you directly, and I am sending Mr. Roncalio a copy of this letter.

After reading an article by Robert Gillette in Science ("Schlesinger and the AEC: New Sources of Energy", Science, Vol 175, Jan. 14 '72 p147-151.) I had entertained hopes that under your leadership the AEC would change its basic goals and attitudes, as well

as its internal organization, sufficiently to bring it more in line with present day needs in the nuclear energy field. I was in hopes that public confidence in this agency, sadly eroded in recent years, could be restored.

The AEC has been criticized for being an autonomous, self-regulatory, all powerful agency, which, as promoter of nuclear energy projects, and regulator of public health standards for radiation, never gave proper concern for the latter responsibility in pursuing the former. In this article you are quoted as saying that the new AEC. will be "getting away from the attitude, to wit, that atoms are beautiful. Historically, this attitude is understandable. But in fact, atoms may or may not be useful, depending on the circumstances." (p149)

After reading of these changes at the top, I was encouraged; but after reading both the Wagon Wheel (WASH-1524)

and Rio Blanco (WASH-1519) Draft Environmental Statements, both of which make a mockery of the intentions of the National Environmental Policy Act, and both of which only thinly disguise the profiteering motives of the gas companies involved, I am not encouraged at all.

After members of our committee attended the Rio Blanco hearings both in Meeker and Denver on March 24 and 27, they were quite discouraged, when they saw the lack of advance notice given, the arbitrary rules set up by the AEC for those testifying against the project, and the red tape involved which made it extremely difficult for local concerned and knowledgeable people to testify at all.

Governor Stan Hathaway and Senator Clifford Hansen, as well as Congressman Teno Roncalio, have asked that public hearings be held in Pinedale. Mr. Roncalio is genuinely concerned about the inadequacies of the draft Environmental

Statement. Governor Hathaway and Senator Hansen wish to be sure the local objectors understand the "seriousness" of a "national shortage of energy."

Our committee is gravely concerned lest these hearings, if held, turn out to be another AEC whitewash job, with no open and fair consideration being given to the opposition.

Perhaps your new goals have not filtered down to the bottom of the vast AEC hierarchy as yet. We therefore send the enclosed copy of the comments of our committee on the Wagon Wheel Project Environmental Statement directly to you. We hope you will give it careful consideration, and that you will see justice done in this case.

We are looking forward to hearing from you soon.

Sincerely,
Mary Ann Steele
Sublette County Wagon
Wheel Information Committee

Box 53
Boulder, Wyoming 82923
April 3, 1972

Mr. William D. Ruckelshaus, Administrator
Environmental Protection Agency
Washington, D.C. 20500

Dear Mr. Ruckelshaus:

On January 3, 1972, Time Magazine ran an article in which President Nixon was quoted as saying to you that "you're the enforcer" when he swore you in as the Environmental Protection Agency's first administrator. Average citizens everywhere were gratified that action on environmental problems was forthcoming.

We are a committee of average citizens who are opposed to the Atomic Energy Commission's Plowshare Project Wagon Wheel for nuclear stimulation of natural gas in Sublette County, Wyoming, in the fall of 1973. Local opposition to this project had consisted of a few

mental reservations until El Paso Natural Gas Company (the industrial sponsor) and the AEC. published their draft Environmental Statement (WASH-1524) in January 1972, in compliance with the requirements of the National Environmental Policy Act. When the public became aware that this Statement made an absolute mockery of the intentions of this Act, and saw how thinly disguised were El Paso's profiteering motives, opposition became intense, organized, and very vocal.

When our committee contacted Mr. Dubois, the Deputy Regional Administrator of the EPA at Denver, he told us that his office was preparing comments on the Environmental Statement, but that the Agency's role was one of "reviewing".

Are you really the "enforcers" as Mr. Nixon stated? Or has your role lately been reduced to that of reviewer? Or are you only empowered to enforce rules for individual citizens and private

businesses, and are without power over governmental agencies such as the AEC, even though this agency has a record for being one of the nation's most dangerous polluters?

The AEC has been requested to hold public hearings in Pinedale, Wyoming, by Congressman Teno Roncalio, who is genuinely concerned about the inadequacies of the Environmental Statement, and also by a joint request of Governor Hathaway and Senator Clifford Hansen, who want to be sure the local objectors understand the "seriousness" of a "national shortage of energy". If these hearings are conducted by the AEC in the arbitrary dictatorial manner in which the Rio Blanco, Colorado hearings were conducted, (and several members of our Committee attended those hearings), we hold little hope for a fair consideration of our side.

We are enclosing our comments on this Environmental Statement, as well as a

letter from the Wyoming State Game and Fish Commission which also strongly criticizes it. We are also enclosing some other pertinent material.

We sincerely hope that your agency will throw its full weight behind our efforts to prevent exploitation of Wyoming residents.

Sincerely yours,
Mary Ann Steele
Wagon Wheel Information
Committee of Sublette
County.

March 29, 1972

Dear *Mr. Ruckelshaus*:

On March 20, 1972, the Wagon Wheel Information Committee in conjunction with the Sublette County Commissioners held a public meeting to discuss the AEC Draft Environmental Statement of the Wagon Wheel Project with the assurance of Congressman Teno Roncalio, that the comments made by both government officials and private individuals at that meeting would be considered by the AEC.

Dr. Kenneth Perry described the project, and enclosed is a summary containing the highlights of each speaker's comments.

Petitions were available for signatures at the meeting, and were later circulated in the community. 91% of the voters of the Boulder Community signed the petition. Boulder is the closest town to the Project site.

There were between 500-600 people at the meeting, and it was conducted in a calm, orderly fashion. The audience asked pertinent questions, and were generally well informed.

Also enclosed is a letter from James D. White, Commissioner, of the Wyoming State Game and Fish Commission, and a copy of a letter to me from Congressman Teno Roncalio, and newspaper clippings and letters pertaining to the meeting.

We hope you will read this information carefully, and let us know your feelings.

Sincerely,

Mrs. Sally Mackey
Wagon Wheel Information Committee

SM:pb

Box 53
Boulder, Wyoming 82923
April 3, 1972

Ms. Dubois
Deputy Regional Administrator
Environmental Protection Agency
Lincoln Towers Building
Denver, Colorado

Dear Ms. Dubois:

I am enclosing a copy of the comments of the Sublette County Wagon Wheel Information Committee on the draft Environmental Statement. I hope, as you said you would do in our phone conversation of last week, you will add to your agency's comments any points which we have raised that your agency had not included.

I am also enclosing a copy of a letter which I have written to Ms. Ruckelshaus, the National Administrator

of the Environmental Protection Agency.

I hope that your agency will
exert its full powers in behalf of
the residents of Sublette County.

Sincerely,

Mary Ann Steele

Sublette County
Wagon Wheel Information
Committee