



June 20, 2023

Submitted via eplanning.blm.gov

Andrew Archuleta
State Director
Bureau of Land Management
Wyoming State Office
5353 Yellowstone Road
Cheyenne, WY 82009

Re: BLM Wyoming Q4 2023 Oil and Natural Gas Lease Sale Environmental Assessment and Proposed Finding of No Significant Impact

Dear Director Archuleta:

Western Energy Alliance is pleased to see BLM is moving forward with the Q4 2023 oil and natural gas lease sale and submits these comments on the environmental assessment (EA) and Finding of No Significant Impact (FONSI). The Alliance urges BLM to issue the FONSI for this EA and proceed expeditiously with the planned sale.

The Alliance provides these comments to strengthen and clarify the EA to ensure that BLM presents the analysis in proper context and in a defensible manner that better informs agency decision-making and avoids creating confusion for the reviewing public.

Greenhouse Gas Emissions

As a general matter, the EA thoroughly describes the affected environment and analyzes direct, indirect, and cumulative greenhouse gas (GHG) emissions in great detail. The methods used to estimate GHG emissions are reasonable and within the agency's discretion. The technical data that BLM relies upon and presents in the EA is comprehensive and is more than sufficient to satisfy the National Environmental Policy Act (NEPA) for purposes of informing BLM decision-making at the leasing stage.

While the EA includes an analysis of emissions and the social cost of GHG emissions (SC-GHG), BLM overstates the costs and ignores the benefits of leasing the parcels. We disagree with the application of the SC-GHG to individual lease sales. BLM is not under any legal requirement to utilize the SC-GHG in environmental analyses and, in fact, it is not a tool that provides any meaningful information to either the public or the decision-maker at this scale.

Greater Sage-Grouse

BLM is proposing to defer four (4) parcels from the Wyoming Q4 2023 sale due to IM 2023-007 leasing preference criteria #2 which would deem the parcels low preference

based upon the presence of Greater Sage-Grouse (GRSG) habitat. In doing so, BLM disregarded its own process for prioritizing parcels based on the 2015 RMP amendments and disregarded the significant technological advances in horizontal drilling that have occurred in Wyoming. The average horizontal well in the Powder River Basin can be drilled to a depth of approximately two miles and at a lateral distance of two to three miles. These significant distances result in substantially less surface disturbance while at the same time increasing production efficiency. We call your attention to the peer reviewed study by Applegate and Owens that shows a 70% reduction in surface disturbance in Wyoming from increased use of horizontal drilling.¹ BLM's analysis needs to account for this decrease in surface disturbance and access roads created by the transition to horizontal drilling and the resulting reduction in habitat fragmentation. BLM must also ensure it follows the existing 2015 GRSG RMP amendments and account for the technological advancements that have taken place since that time in its analysis.

Proximity to Existing Development

BLM is proposing to defer one (1) parcel from the Wyoming Q4 2023 sale due to IM 2023-007 leasing preference criteria #1 which would deem parcels low preference based on the absence of existing oil and gas development, existing federal leases, federal units, or participation areas within five miles of the proposed parcel. BLM needs to ensure it does not arbitrarily defer parcels that are eligible for lease, particularly where deferral is not supported by the administrative record or the governing RMPs. Locating prospective reserves is one of the fundamental tasks of oil and natural gas operators who allocate their resources carefully to invest in only those parcels that are likely to provide meaningful returns. Should a parcel really be "low potential," no bids would be submitted. But the mere fact that this parcel has been nominated represents compelling evidence of the parcel's potential.

Conclusion

Western Energy Alliance welcomes Wyoming BLM's intent to conduct a fourth quarter 2023 lease sale. We urge BLM to expeditiously issue a FONSI. Please do not hesitate to reach out to me with any questions.

Sincerely,



Kathleen M. Sgamma
President

¹ ["Oil and gas impacts on Wyoming's sage-grouse: summarizing the past and predicting the foreseeable future,"](#) *Human-Wildlife Interactions Vol. 8 No 2*, Dave H. Applegate and Nick L. Owens, 2014, p. 284-290.