



Submitted via www.regulations.gov

Doug Vilsack
BLM Colorado State Director
Denver Federal Center
Building 40
Lakewood, Colorado 80225

RE: Areas of Critical Environmental Concern (ACEC) in the Draft Resource Management Plan and Supplemental Environmental Impact Statement for the Colorado River Valley Field Office and Grand Junction Field Office

Dear Director Vilsack:

Western Energy Alliance and the West Slope Colorado Oil and Gas Association (the Trades) wish to express their dismay over the Bureau of Land Management's (BLM) inclusion of nine Areas of Critical Concern (ACEC) in the draft Resource Management Plan (RMP) and Supplemental Environmental Impact Statement (EIS) for the Colorado River Valley Field Office (CRVFO) and Grand Junction Field Office (GJFO), as published in the Federal Register on August 4, 2023.

Western Energy Alliance (the Alliance) is the leader and champion for independent oil and natural gas companies in the West. Working with a vibrant membership base for nearly 50 years, the Alliance stands as a credible leader, advocate, and champion of industry. Our expert staff, active committees, and committed board members form a collaborative and welcoming community of professionals dedicated to abundant, affordable energy and a high quality of life for all. The majority of independent producers are small businesses, with an average of fourteen employees.

The Colorado Oil & Gas Association is a non-profit trade organization that represents over 200 companies throughout the state of Colorado. For Nearly 40 years, COGA has sought to create a thriving, innovative and respected oil and natural gas industry in Colorado that embodies the values of our communities, prioritizes the protection of our environment, and provides the natural resources that advance our society. COGA provides a positive, unified, and proactive voice for the oil and natural gas industry in Colorado.

West Slope Colorado Oil and Gas Association (WSCOGA) is a member-based organization focused on promoting the development of natural gas and oil resources in Northwest Colorado. WSCOGA provides a unified political and regulatory voice for the oil and natural gas industry in the Piceance Basin and Western Colorado. WSCOGA's represents over 90 member companies and its mission is to promote the development of Western Colorado natural gas and petroleum products for the benefit of society. WSCOGA is an affiliated chapter of the Colorado Oil & Gas Association.

On June 12, 2015, BLM published the Record of Decision (ROD) and approved RMP for the CRVFO. In the proposed RMP, BLM considered a Greater Sage-Grouse ACEC that was dropped from the final RMP and ROD. On August 24, 2015, BLM published the ROD and approved RMP for the GJFO. In the proposed RMP, BLM considered eight ACECs—Atwell Gulch, Badger Wash, Glade Park-Pinyon Mesa, John Brown Canyon, Mt. Garfield, Plateau Creek, Prairie Canyon, and South Shale Ridge—that it did not carry forward into the final approved RMP and ROD. Eight short years later, BLM is now including these ACECs in the draft RMP and Supplemental EIS for these two field offices.

BLM has failed to provide any compelling evidence as to why, after such a short period of time, it has included these ACECs in the Preferred Alternative. Further, BLM is preparing this supplemental SEIS for purposes of complying with a judicial ruling involving greenhouse gas emissions. None of these ACECs has anything to do with greenhouse gas emissions and therefore should not be revisited with the update to the RMP/SEIS. The Trades strongly recommend that BLM not include these ACECs in the Preferred Alternative for the final RMP and SEIS.

Thank you for your consideration of our input on ACECs. We will be commenting fully on the draft RMP/SEIS by the November deadline.

Sincerely,



Kathleen M. Sgamma
President, Western Energy Alliance



Chelsie Miera
Executive Director, WSCOGA



William Groffy
Director of Regulatory and Legislative Affairs, COGA