

*Submitted via [eplanning.blm.gov](https://eplanning.blm.gov)*

October 30, 2025

**Acting State Director Kris Kirby**

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

**RE: Comments on the 2026 First Quarter Competitive Oil and Gas  
Lease Sale DOI-BLM-WY-0000-2025-0003-EA**

**Dear Acting State Director Kirby:**

The Western Energy Alliance (Alliance) appreciates the opportunity to submit these comments on the Bureau of Land Management's (BLM) Environmental Assessment (EA) for the 2026 First Quarter Competitive Oil and Gas Lease Sale (DOI-BLM-WY-0000-2025-0003-EA), in accordance with 43 C.F.R. § 3120.42(a).

The Alliance represents member companies engaged in environmentally responsible exploration and production of oil and natural gas across the West. Our members operate extensively in Wyoming and are directly affected by BLM's leasing program decisions. The Alliance recognizes BLM's essential role in overseeing vital leasing and permitting responsibilities that sustain energy development, conservation, recreation, and other public land uses.

The Alliance and its members appreciate BLM's work to ensure that oil and natural gas leasing decisions comply with federal law and reflect the agency's commitment to transparency, environmental stewardship, and economic opportunity. By proceeding with the 2026 First Quarter sale, BLM is demonstrating responsible implementation of its multiple-use mandate and reaffirming the importance of maintaining a consistent, lawful federal leasing program.

Therefore, the Alliance strongly supports BLM's effort to proceed with this lease sale.

## **General Comments**

### **A. Support for Timely and Lawful Lease Sales**

The Alliance commends BLM for maintaining a regular leasing schedule in compliance with the MLA's requirement that competitive oil and gas lease sales occur "at least quarterly" where eligible lands are available. Regular lease offerings provide consistency for operators and generate critical federal, state, and local revenues. Predictable quarterly sales, such as the 2026 First Quarter sale, provide business confidence to Alliance members operating in Wyoming, stimulate investment in Wyoming, and support funding for federal conservation programs, including the Great American Outdoors Act. Therefore, the Alliance supports BLM's decision to move forward with this sale as evidence that the agency is meeting its statutory obligations while fostering economic growth and energy security.

### **B. Preference Criteria Should Reflect a Balanced Multiple-Use Mandate**

The Alliance appreciates BLM's use of preference criteria to evaluate nominated parcels and encourages continued transparency in applying those criteria. Parcels nominated through Expressions of Interest (EOIs) represent areas of demonstrated industry interest and development potential. These nominations should carry a presumption of high leasing preference, consistent with the multiple-use and sustained-yield principles of FLPMA and the production goals of the MLA. While BLM must evaluate resource conflicts, the agency should ensure that non-development criteria (e.g., recreation or visual values) do not outweigh the statutory prioritization of mineral production as a principal use of public lands under 43 U.S.C. § 1702(I). BLM retains the authority to apply protective stipulations where appropriate without categorically deferring low-preference parcels. BLM should also consider whether an additional explanation as to how the Proposed Action complies with the 2015 GrSG plans' objective of prioritizing leasing outside of greater sage grouse habitat would make the agency's action more legally defensible.

### **C. Compliance with the BUILDER Act and Streamlined NEPA Review**

The Alliance supports BLM’s application of NEPA under the BUILDER Act, which clarifies that environmental reviews should consider only effects with a “reasonably close causal relationship” to the proposed action. By avoiding speculative, far-downstream analyses and focusing on direct and reasonably foreseeable effects, BLM can maintain environmental rigor while reducing unnecessary delay. The Wyoming State Office’s efficient and legally sound approach in this EA exemplifies the intent of Congress to streamline permitting and leasing processes. This efficiency ultimately benefits both environmental stewardship and responsible development by enabling timely review, mitigation, and oversight.

### **D. Implementation of the IRA’s Leasing Provisions**

Section 50265 of the Inflation Reduction Act (IRA) requires BLM to offer a meaningful portion of nominated acreage prior to authorizing renewable energy rights-of-way. The Alliance supports BLM’s progress toward meeting these requirements through the 2026 First Quarter sale. Maintaining a robust leasing program ensures balanced energy policy and fulfills Congress’s intent that oil and natural gas leasing remains a vital component of the nation’s energy portfolio. To further strengthen this process, the Alliance encourages BLM to continue reviewing EOIs on a rolling basis over multiple quarters rather than limiting consideration to short-term submission windows. This approach would improve transparency, ensure fairness for nominators, and maintain a consistent pipeline of parcels for upcoming sales.

### **E. Federal Oil and Natural Gas as a Principal Use of Public Lands**

Under FLPMA, mineral exploration and production remain a “principal or major use” of public lands. Congress directed BLM to manage these lands in a manner that recognizes the nation’s need for domestic energy and mineral resources. Offering available and eligible parcels for lease advances this directive, supports thousands of Wyoming jobs, and generates substantial federal and state revenue. Conversely, restricting or delaying leasing would undermine these objectives, reduce energy security, and diminish funding for conservation and infrastructure. The Alliance supports BLM’s balanced

approach in this EA, which ensures continued access to domestic energy while applying appropriate environmental safeguards.

## **F. Conclusion**

The Alliance strongly supports BLM's decision to proceed with the 2026 First Quarter Competitive Oil and Gas Lease Sale. This sale complies with the law, upholds the multiple-use mission of the agency, and reflects the priorities of the One Big Beautiful Bill (OBBB) by advancing American energy production in a timely and responsible manner. The Alliance encourages BLM to maintain its commitment to consistent quarterly lease sales and to continue transparent communication regarding EOI processing and parcel evaluation.

Thank you for your consideration of these comments and for BLM's ongoing efforts to sustain a lawful, efficient, and balanced federal onshore oil and gas leasing program.

**Sincerely,**

A handwritten signature in black ink, appearing to read 'MS', with a long horizontal line extending to the right.

**Melissa Simpson**  
**President**  
**Western Energy Alliance**