September 30, 2026

Christina Price
Acting State Director
Bureau of Land Management, Utah State Office

Submitted via BLM National NEPA Register

RE: Oil and Gas Leasing Vernal Resource Management Plan Amendment
NEPA No. DOI-BLM-UT-G010-2026-0128-RMP-EA

Dear Acting State Director Price:

The Utah Petroleum Association ("UPA") and Western Energy Alliance ("WEA") appreciate the opportunity to provide comments regarding the Bureau of Land Management's ("BLM") proposed amendment to the Vernal Resource Management Plan ("RMP") to allow oil and natural gas leasing of the federal mineral estate underlying the Ouray National Wildlife Refuge ("Refuge"), subject to a No Surface Occupancy ("NSO") stipulation.

UPA and WEA strongly support the Proposed Action.

UPA represents Utah's oil and natural gas industry, including companies engaged in exploration and production, transportation, refining, and other activities throughout the state. Importantly, UPA members currently operate oil and natural gas facilities and infrastructure within the Uintah Basin, including in areas within and adjacent to the area addressed by this RMP amendment. These companies have extensive experience responsibly developing the Basin's resources and deploying modern drilling technologies that reduce surface disturbance while allowing efficient recovery of subsurface resources.

Western Energy Alliance is the leader and champion for independent oil and natural gas companies in the western United States. Working with a vibrant membership base for over 50 years, the Alliance stands as a credible leader, advocate, and champion of industry. Alliance members engage in all aspects of environmentally responsible exploration and development of oil and natural gas. Our expert staff, active member 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.

BLM is considering making approximately 5,200 acres of federal mineral estate underlying the Refuge available for oil and gas leasing, subject to an NSO stipulation applicable to newly issued federal leases. This approach appropriately recognizes that advances in drilling technology may allow responsible development of the federal mineral estate without new surface occupancy on the leased Refuge surface.

Modern Technology May Allow Federal Mineral Development Under NSO Protections

The Associations support BLM's consideration of whether the federal minerals underlying the Refuge can be accessed using modern directional and horizontal drilling technology while prohibiting new surface occupancy on the leased Refuge surface under newly issued federal leases.

Directional and horizontal drilling have fundamentally changed the relationship between subsurface mineral development and surface disturbance. A modern well can extend substantial distances laterally from a surface location, allowing operators to access mineral resources that are located far from the well pad itself. As a result, subsurface minerals underlying lands where surface occupancy is inappropriate can nevertheless be responsibly developed from locations outside those lands.

Indeed, BLM's Federal Register notice specifically states that its purpose includes consideration of "modern drilling technology" in determining how the federal minerals beneath the Refuge should be managed. Under the Proposed Action, any future development of newly leased federal minerals would be required to comply with the applicable NSO stipulation and would remain subject to subsequent site-specific review and approval.

This is an important distinction. The RMP amendment does **not** require a choice between protecting the surface of the Refuge and developing the underlying federal mineral resource. Modern technology provides a development scenario capable of accomplishing both objectives.

The Associations therefore encourage BLM to evaluate the Proposed Action based on current drilling technologies and development practices rather than assumptions associated with historical oil and gas development. While existing activity involving SITLA or other non-federal minerals is separate from the federal minerals addressed by this amendment, as an example, 2,354 acres of SITLA mineral ownership is currently safely and responsibly leased below or adjacent to the refuge today. The relevant question for the Proposed Action is whether the identified federal minerals can be safely, responsibly, and economically recovered while complying with NSO restrictions applicable to newly issued federal leases. The answer is yes.

The Proposed Action Can Promote More Efficient Resource Recovery and Minimize Waste

Allowing access to the federal minerals beneath the Refuge also provides important resource-conservation benefits.

Oil and natural gas reservoirs do not conform to surface ownership or administrative boundaries. Where development already occurs on lands surrounding a restricted mineral area, preventing access to an adjoining portion of the same reservoir can result in inefficient development patterns, incomplete resource recovery, unnecessary operational complexity, and potential waste of otherwise recoverable federal resources.

The Associations' members already operate in this portion of the Uinta Basin. If the federal minerals beneath the Refuge are leased subject to NSO restrictions, access from compliant surface locations may allow those federal resources to be incorporated into more logical and efficient development plans.

Long-reach horizontal wells and multi-well pad development can allow operators to recover more resource from fewer surface locations. Where existing or planned development infrastructure is available nearby, operators may also be able to utilize existing roads, gathering systems, pipelines, production facilities, or other infrastructure rather than constructing duplicative facilities.

The result can be both **greater resource recovery and less incremental surface disturbance**.

BLM should therefore consider in its environmental and economic analysis the extent to which the Proposed Action may:

- facilitate orderly and efficient development of a shared or contiguous mineral resource;
- allow longer laterals and more efficient well-spacing and development configurations;
- reduce the number of surface locations necessary to recover the resource;
- allow greater use of existing or nearby infrastructure;
- avoid the need to design development around an artificial subsurface exclusion area; and
- reduce the potential for stranded federal minerals or avoidable waste.

These are important environmental and resource-management benefits of the Proposed Action, not simply economic considerations.

The NSO Stipulation Provides a Strong and Appropriate Surface Protection

The Associations support BLM's proposed NSO stipulation. Under the Proposed Action, newly issued federal leases would prohibit new surface occupancy on the leased Refuge

surface while allowing the federal minerals to be accessed through directional or horizontal drilling from compliant surface locations. The stipulation would apply to the newly issued federal leases and would not govern Tribal, SITLA, private, or other non-federal minerals within the Refuge boundary.

This creates an appropriate separation between protection of the Refuge surface and responsible management of the federal mineral estate beneath it.

BLM and the U.S. Fish and Wildlife Service will retain their respective authorities to evaluate and protect wildlife, habitat, water, cultural resources, and other environmental values as development proposals advance. The RMP amendment is a land-use planning decision, not a drilling permit. Any later federal development would require additional approvals, including an Application for Permit to Drill, site-specific environmental review, and compliance with other applicable legal requirements.

BLM should preserve sufficient flexibility within that framework to allow operators and agency specialists to determine the safest and most efficient locations, well trajectories, lateral lengths, and development configurations capable of accessing the resource while complying with the NSO requirement.

The Proposed Action Better Reflects Current Technology and Responsible Resource Management

The current RMP closure was developed under technological and development assumptions that should be reconsidered in light of modern drilling capabilities.

BLM correctly identifies its purpose as optimizing the Vernal RMP in consideration of modern drilling technology and providing for the orderly and environmentally responsible development of federal oil and natural gas resources, with appropriate protections for wildlife species, populations, and habitat.

The Proposed Action accomplishes that objective.

Maintaining a categorical prohibition on leasing the underlying federal minerals is unnecessary where the environmental concern can instead be addressed directly through an NSO stipulation. A management approach that protects the surface while allowing technologically feasible subsurface access is more precise and better suited to modern oil and gas development.

The Proposed Action also supports broader federal and state interests in domestic energy production. BLM notes that oil and gas development on BLM-managed public lands provides approximately $3 billion in economic benefits to Utah. The Uintah Basin remains Utah’s most important producing region, providing energy, employment, tax revenue, and significant economic activity for rural communities and the State.

Responsible access to federal mineral resources should be encouraged where it can occur without compromising other important land-management and environmental stewardship objectives. This proposal presents precisely that opportunity.

Conclusion

The Associations strongly support BLM's Proposed Action to amend the Vernal RMP and make the identified federal mineral estate underlying the Ouray National Wildlife Refuge available for leasing through newly issued federal leases subject to an NSO stipulation.

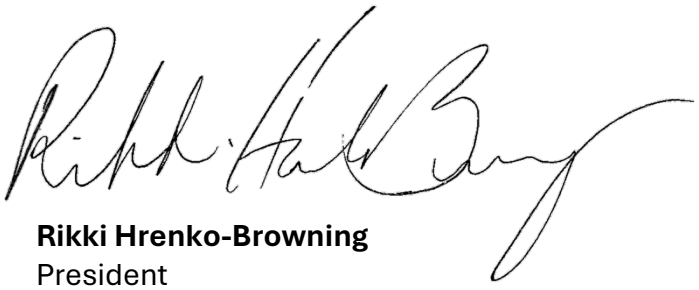
Modern directional and horizontal drilling provide a safe, responsible, and economically viable means of accessing the identified federal minerals while complying with NSO restrictions applicable to newly issued federal leases. This would protect the leased Refuge surface from new occupancy under those leases while allowing BLM to consider orderly development of the federal mineral estate through subsequent, site-specific review and approvals.

For companies already operating in and adjacent to this area, access to these minerals can also enable more efficient development configurations, improve resource recovery, utilize existing infrastructure where appropriate, reduce duplicative disturbance, and minimize the potential for stranded resources and waste.

The Associations encourage BLM to fully evaluate these benefits in the RMP amendment and associated environmental analysis and ultimately adopt the Proposed Action.

Thank you for your consideration of these comments and for BLM Vernal Field Office's continued engagement with Utah's oil and natural gas industry.

Sincerely,



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