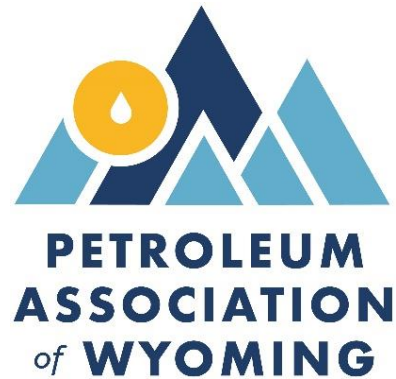




WESTERN ENERGY ALLIANCE



June 4, 2026

State Director Tanya Thrift
Bureau of Land Management
Wyoming State Office
5353 Yellowstone Road
Cheyenne, WY 82009
Submitted via eplanning.blm.gov

RE: BLM Wyoming 2026 Third Quarter Competitive Lease Sale Draft Environmental Assessment,
DOI-BLM-WY-0000-2026-0002EA

Dear State Director Thrift:

Western Energy Alliance and the Petroleum Association of Wyoming (collectively the Associations) submit these comments on the Bureau of Land Management's (BLM) draft environmental assessment (EA) and finding of no significant impact (FONSI) for the Wyoming third quarter 2026 oil and natural gas lease sale.

The Associations represent member companies operating in Wyoming, who are the most directly and substantially impacted by BLM's decision-making for the third quarter 2026 lease sale. Our members have a profound interest in pursuing orderly development and achieving maximum recovery of oil and natural gas, while attaining the highest environmental benefit.

The Associations appreciate that BLM is proposing to offer up to 268 parcels for lease in the September sale. The timely leasing of nominated parcels is in line with Congress's mandate under the Mineral Leasing Act and the recently passed One Big Beautiful Bill Act, and we fully support BLM's intention to move forward with the sale.

However, we write to express our concern with one section of the Proposed Alternative, regarding the effects of leasing on big game habitat. This section of the Proposed Alternative analyzes overly expansive avoidance areas around migration corridors that are not consistent with the best available science, the State of Wyoming's Executive Order and management prescriptions, and the applicable resource management plans and statutory requirements.

The 1-Mile Avoidance Areas Are Not Consistent with the Best Available Science and Technologies

Under the Proposed Action in the draft EA, BLM is analyzing the effects of leasing and development of the 268 parcels on big game such as mule deer and pronghorn. Per pages 60 and 61 of the draft EA:

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In order to capture indirect effects from development of the leases, the BLM has applied a 1-mile buffer around the boundary of the lease. However, it should be noted that the cited study found that mule deer consistently avoided infrastructure (i.e. well pads) within 0.6 to 1 mile and was conducted on the Pinedale Anticline which was engaged in year round drilling meaning that timing limitations disallowing surface occupancy and disturbance during the restricted timeframe to protect crucial winter range, was not in effect. By utilizing a 1-mile buffer around the lease boundary, **the resultant impact analysis is likely exaggerated** and by necessity assumes that the entirety of the lease is disturbed and occupied by infrastructure which is **not an accurate depiction of likely future development.** (*emphasis added*)

As BLM notes itself in the draft EA, presuming 1-mile avoidance around the boundary of a lease exaggerates the impacts to big game, and assuming the entire surface area of the lease will be disturbed is an inaccurate depiction of how development will occur on these leases. BLM goes on to note:

Furthermore, it is **likely not an accurate depiction** of future development across the vast majority of the leases under analysis because the RFD for these leases predicts minimal vertical well development and favors highly deviated or horizontal well bore which drains a much larger amount of the reservoir and has less surface density as more wells are located on single well pads thereby concentrating points of disturbance and reducing the density of potential road development. Nevertheless, the BLM is electing to use the 1 mile buffer to ascertain the amount of habitat that could potentially be indirectly affected by development of all of the parcels considered. (*emphasis added*)

Even taken at face value, this analysis is not consistent with BLM's obligation to analyze the reasonably foreseeable environmental effects of its decision to offer parcels for lease. The Associations question whether there are reasonably foreseeable environmental effects on big game from BLM's decision to offer parcels for lease—as distinguished from any future decision to authorize development. To the extent BLM determines there are reasonably foreseeable environmental effects on big game from its decision to offer parcels for lease it should incorporate best available science and reliable development forecasting, such as the reasonably foreseeable development scenarios utilized elsewhere in the draft EA. In this instance, the EA greatly overstates the surface disturbance from leasing, presumes avoidance of an area that is unnecessarily and inaccurately large, and relies on studies that do not reflect current industry practices.

First and foremost, recent studies on the impacts to mule deer from energy development suggest that the species tend to remain one *kilometer* away from oil and gas infrastructure, not one *mile*.¹ It is

¹ Sawyer H, Korfanta NM, Nielson RM, Monteith KL, Strickland D. [Mule deer and energy development-Long-term trends of habituation and abundance](#). Glob Chang Biol. 2017 Nov;23(11):4521-4529. doi: 10.1111/gcb.13711. Epub 2017 May 10. PMID: 28375581.

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unclear why BLM has chosen to expand the avoidance presumption from one km to one mile, but regardless this grossly overstates the reasonably foreseeable effects of oil and gas development on big game.

Although commenters on previous BLM lease sales have requested an analysis of the impacts within one mile of development, BLM is not required to do so since it is not consistent with the best available science. BLM's final EA should recognize that the one-mile avoidance zone is excessive and decline to presume 1-mile avoidance in future lease sale EAs.

Furthermore, BLM's analysis presumes development will occur on all parcels offered for lease, and that the entirety of the surface area of the lease will be disturbed. This reflects an outdated and inaccurate depiction of current drilling technologies and demonstrates why attempting to analyze the cumulative impacts to big game at the leasing stage is, by definition, speculative.

Even if BLM moves forward with leasing all 268 parcels as contemplated in the Proposed Alternative, there is no guarantee that all parcels will receive winning bids, that all parcels will be developed, or that surface disturbance will occur on each individual parcel. To the extent surface disturbance does occur on any or all of these parcels, the total disturbance of surface acreage and big game habitat can only be measured retroactively once development occurs, and it will be dictated by localized determinations that will occur at the permitting stage.

As the draft EA notes, the studies BLM relies on in establishing the one-mile avoidance zone are years old and are not consistent with horizontal drilling and technological developments since they were conducted. The actual surface disturbance that will occur on individual parcels leased in this sale will be minimal compared to the analysis of the entire lease being disturbed. With the introduction and utilization of horizontal drilling, operators maximize the use of the initial surface footprint during development and production by consolidating multiple wells on a single drilling location and co-locating the associated production facilities within that same initial disturbance.

This consolidation and efficient use of surface activities means current multi-well pads are often equal to, or smaller in size, than what was historically required to develop a single well, resulting in an overall minimized surface footprint. Further, a drilling and facility pad that averages around 12 acres of surface disturbance can now access up to 1,280 mineral acres via a two-mile horizontal lateral, or 2,560 acres if drilled in two directions. These lengthy laterals, which technological developments are now extending to three and even four miles, means that the total disturbance for that associated development is under 1% of the accessed mineral acres.

The draft EA's analysis presuming universal surface disturbance on every offered parcels creates an inaccurate, exaggerated depiction of disturbance from potential development of these leases. BLM's final EA should make clear that the analysis is not reflective of the true potential impacts from this lease sale.

The State of Wyoming is Responsible for Managing Big Game Species Protections

BLM should make clear in the final EA that the State of Wyoming, and specifically Wyoming Game & Fish (WGF), is responsible for managing big game species and should ensure all applicable land use management complies with state practices. The big game species analyzed in the draft EA are not listed as threatened or endangered under the Endangered Species Act, nor are they special status species or candidate species that require additional federal prescriptions.

The State of Wyoming maintains an Executive Order (EO 2020-1) that guides the management of mule deer and antelope migration corridor protection.² BLM must defer to Wyoming's management of the species, and it should not impose any regulatory burdens through the leasing and permitting process that are inconsistent with WGF's management practices. The draft EA's impacts analysis is overly expansive, as discussed above, and not consistent with EO 2020-1.

As companies move forward with energy development in Wyoming, they are required to work with WGF to ensure projects provide for both energy production and species protections. As part of the Wyoming framework, the State has developed migration corridors in which production can still occur; it must simply be done in consultation with WGF that includes mitigation of impacts and reclamation once development is completed.

Analyzing a one-mile avoidance zone around each lease in the third quarter sale implies that the impacts will be substantial. In fact, the actual environmental impacts from leasing are zero – no surface disturbance occurs merely because a lease sale is held. Rather, environmental impacts take place after BLM issues the lease, the leaseholder consults with WGF on their potential impacts to big game, and BLM finalizes a permit that allows for development.

BLM's unreasonable impacts analysis at the leasing stage is not reflective of the reality of big game management in the State of Wyoming. BLM should acknowledge in the final EA that it is not imposing management prescriptions that are inconsistent with state policy, since Wyoming Game & Fish maintains jurisdiction over these species.

BLM Cannot Impose Conditions of Approval at the Permitting Stage

Finally, BLM should make clear in the final EA that under no circumstances will it require conditions of approval (COA) on drilling permits because of the big game impacts analysis. While the draft EA evaluates potential impacts to big game habitat as a result of leasing, there are no stipulations attached to the analysis. This is appropriate, as the applicable resource management plans for the parcels at offer in the sale do not condition development on stipulations for big game habitat.

² [Executive Order 2020-1: Wyoming Mule Deer and Antelope Migration Corridor Protection.](#)

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Per Sec. 50101 of Public Law 119–21, also known as the One Big Beautiful Bill Act, “A lease issued by the Secretary under this section with respect to an applicable parcel of land made available for leasing...shall be subject to the terms and conditions of the approved resource management plan...and may not require any stipulations or mitigation requirements not included in the approved resource management plan.”

Because the applicable RMPs in Wyoming do not impose stipulations or mitigation requirements for big game habitat, BLM cannot impose such COAs in this lease sale, or any future lease sale, or on the permits issued pursuant to those leases. BLM should make clear in the final EA that it has no intention – and no statutory authority – to do so.

Conclusion

The Associations appreciate that BLM is moving forward with robust leasing in the third quarter lease sale in Wyoming. We request that the final EA acknowledge the limitations inherent in the draft EA's big game impacts analysis – scientific, regulatory, and statutory – and in future sales BLM should conduct a more targeted review. Thank you for the opportunity to submit these comments, and please do not hesitate to reach out to us with any questions.

Sincerely,



Melissa Simpson
President
Western Energy Alliance



Pete Obermueller
President
Petroleum Association of Wyoming