



November 19, 2014

Via email: [blm\\_wy\\_hdd\\_may\\_parcel@blm.gov](mailto:blm_wy_hdd_may_parcel@blm.gov)

Tom Foertsch  
Bureau of Land Management  
High Desert District Office  
280 Highway 191 N.  
Rock Springs, Wyoming 82901

**RE: Western Energy Alliance Comments on the Environmental Assessment for the May 2015 Oil and Natural Gas Lease Sale – High Desert District Parcels**

Dear Mr. Foertsch:

Western Energy Alliance wishes to express its support for Alternative B, the Proposed Action in the High Desert District leasing Environmental Assessment (EA) for the May 2015 oil and natural gas lease sale. We urge the Bureau of Land Management (BLM) to move forward in the process without any further deferrals of nominated parcels.

Western Energy Alliance represents over 480 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in Wyoming and across the West. The Alliance represents independent producers, the majority of which are small businesses with an average of fifteen employees.

Our industry plays an important role in the economic well-being of Wyoming, and the state's production is a strong contributor toward American energy security. In Wyoming, oil and natural gas exploration and production supports nearly 25,000 high paying jobs with wages totaling nearly \$2 billion, an economic impact of over \$11 billion, and nearly \$3.5 billion in federal and state taxes. These revenues are used to fund infrastructure, education, and other vital services for communities.

**Parcel Deferrals**

BLM originally received Expressions of Interest (EOI) for 75 parcels totaling 121,325.56 federal mineral acres, of which all or part of 51 were deferred due to BLM's determination of conflicts with the Greater Sage-Grouse. 34 parcels totaling 36,851.06 federal mineral acres, or only 30% of the original amount remain available for lease. We object to these continued large deferrals, and urge BLM to move forward with RMP amendments that are based on the state of Wyoming's sage grouse plan.

BLM states in the EA that "[a]ll of the nominated parcels are available for offering at the May 2015 Competitive Lease Sale under the applicable Field Office Resource Management Plans," but that parcels were deferred "pending completion of the ongoing Greater Sage-Grouse RMP amendment process in the Rock Springs, Kemmerer, Pinedale, and Rawlins

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field offices.” However, in accordance with BLM Handbook H-1601-1, which establishes that existing land use plan decisions are authoritative until such time as an amendment or revision is finalized, these parcels should not be deferred for the purpose of waiting for the RMP amendments to be complete.

### **Air Quality**

As affirmed in the EA, the act of leasing in and of itself will result in no impacts. There can be no assumption that a leased parcel will actually be developed, and therefore any attempts to quantify emissions are conjecture. If and when development of a lease is proposed, the Air Quality Division (AQD) of the Wyoming Department of Environmental Quality (WDEQ) stringently regulates air emissions per the Clean Air Act (CAA) with strict permitting requirements before development may actually take place. The Environmental Protection Agency (EPA) has further imposed additional requirements for reducing emissions resulting from oil and natural gas development. Industry has made great technological strides in reducing air impacts, and we hold that the requirements mandated through the WDEQ AQD and EPA more than adequately address potential air impacts.

### **Water Resources**

As with air quality, the EA indicates that the act of leasing will result in no direct impacts to water quality, though subsequent development might result in long and short term impacts. Water is a vital resource in the arid West, and states, which have jurisdiction over water use, have a long history of and expertise in managing their water resources. Industry is required by the Clean Water Act (CWA), the Safe Drinking Water Act (SDWA), and state laws to undertake extensive measures to protect water quality. During the development phase, plans of operations incorporate comprehensive protections to prevent or immediately address the potential spill of contaminants that may impact surface water, and EPA rules require companies to develop Spill Prevention, Control, and Countermeasure (SPCC) plans. Roads and well pads are designed to minimize runoff and sediment buildup in waterways, and wellbore engineering includes multiple layers of steel and concrete to prevent any potential contaminants from escaping the borehole and communicating with groundwater resources. If the use of hydraulic fracturing is employed, companies take precautionary actions to ensure fluids remain in the borehole during fracturing operations and to safely contain and transport fluids from the well site. These precautions and best practices have proved their effectiveness as not one instance of groundwater contamination has been linked to hydraulic fracturing though it has been conducted in over 1.2 million wells in the U.S.

### **Wildlife**

The EA discusses several wildlife and special status species that are present within a number of the proposed lease sale parcels, including raptors, big game, and Greater Sage-Grouse. Each of the field offices’ Resource Management Plans (RMPs) imposes stipulations for the protection of wildlife, including Timing Limitations (TL), Controlled Surface Use

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(CSU), and No Surface Occupancy (NSO). Appropriate Conditions of Approval (COA) may also be applied at the permitting stage for the further protection of wildlife resources. Due to these protective measures, we believe that potential impacts to wildlife can and will be effectively mitigated.

### **Socioeconomics**

As previously stated, the oil and natural gas industry creates a significant number of jobs in the State of Wyoming, and generates billions of dollars in revenue for local, state, and federal coffers. Energy produced domestically reduces the need to import energy from other nations, many of which are antagonistic to American interests, and often do not have the same level of environmental protections in place. Alternative B, which would allow the remaining parcels to be leased, would have the greatest positive socioeconomic impact.

Oil and natural gas production has played a historically significant role in the culture and economic livelihood of the State of Wyoming, and it has been one of the few bright spots in an otherwise moribund economy. Domestic production, predominantly on state and private lands, has allowed the United States to claim the mantle as the world's top producer of oil and natural gas. Production from public lands has historically been an important part of the equation, and to meet the nation's energy needs and to continue to reduce our reliance on foreign sources it must continue to be so into the future. We urge BLM to move forward with Alternative B and refrain from deferring any further acreage.

We appreciate the opportunity to comment, and should you have any questions, please do not hesitate to contact me.

Sincerely,



Kathleen M. Sgamma  
Vice President of Government & Public Affairs

Cc: The Honorable Matt Mead, Governor, State of Wyoming  
The Honorable John Barasso, U.S. Senate  
The Honorable Michael Enzi, U.S. Senate  
The Honorable Cynthia Lummis, U.S. House of Representatives  
Carbon County Commission  
Sweetwater County Commission  
Uinta County Commission