



October 20, 2014

Via email: blm_ut_mt_oq_leasing_comments@blm.gov

Cliff Giffen
Bureau of Land Management
Monticello Field Office
365 North Main
Monticello, Utah 84535

RE: Western Energy Alliance Comments on the Environmental Assessment for the Canyon Country District Office February 2015 Oil and Natural Gas Lease Sale

Dear Mr. Giffen:

Western Energy Alliance wishes to express its support for including all remaining nominated parcels in the February 2015 oil and natural gas lease sale, and we urge BLM to move forward without any further deferrals.

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

Oil and natural gas resources in Utah play a vital role in strengthening the state and local economies, and domestic energy production is the foundation of American energy security. In Utah, the exploration and production industry supports over 15,000 high paying jobs with wages totaling nearly \$1 billion, an economic impact of over \$3.4 billion, and \$828 million in federal and state taxes.¹ The tax revenue from oil and natural gas is used to fund infrastructure, education, and other vital services for society.

BLM originally received nominations for 76 parcels containing about 80,515 acres. After review, BLM deferred all or part of 24 of these parcels representing 18,539 acres, or nearly one-quarter of the total. The reasons given for these deferrals include occupied habitat for Gunnison Sage-Grouse (GuSG), location within a Wilderness Study Area, cultural resource concerns, management of certain parcels by a separate field office, the presence of radiation contaminated ground water, the presence of dense residential developments, and a National Historic Site.

Western Energy Alliance generally disagrees with the practice of extensive parcel deferrals. For instance, the Gunnison Sage-Grouse is not currently a listed species under the Endangered Species Act, yet BLM chose to defer several parcels due to their location

¹ [Western Oil & Natural Gas Employs America](#), John Dunham Associates, 2014 update.

within GuSG habitat. A review of lease sale information for FY13 reveals that nearly one in two nominated parcels in Utah were deferred. We recognize that in certain instances deferrals may be necessary, but we object to the extent the practice has been utilized. We support the principle of multiple use on public lands, and maintain that minerals development and other resource values can easily exist in tandem with one another. We therefore urge BLM to include all remaining parcels in the February 2015 sale.

The Environmental Assessment (EA) considers four primary issues identified during the public scoping period, which we address in turn. These include air quality, migratory birds and raptors, lands with wilderness characteristics, and recreation.

Air Quality

As stated in the EA, both Grand and San Juan Counties are considered to be “in attainment” or unclassified for all criteria pollutants regulated under the Clean Air Act (CAA). The EA states that regional ozone concentration levels in the lease area are of some concern, yet monitored data over many years shows the area remains within the National Ambient Air Quality Standards for ozone.

The Utah Division of Air Quality stringently regulates air emissions per the CAA, and oil and natural gas wells are subject to strict permitting requirements. Further, recent regulations imposed by the Environmental Protection Agency include additional requirements for reducing emissions from the oil and natural gas industry, such as requiring reduced emissions completions technology that captures the vast majority of ozone precursors. We therefore believe that air quality concerns are more than adequately addressed, and the sale of the remaining parcels should move forward as planned.

Migratory Birds and Raptors

Migratory birds and raptors are protected under the Migratory Bird Treaty Act, and the EA contains comprehensive lists of species that may occur within the leasing area. The EA states that nesting surveys for migratory birds may be required for all surface disturbing and occupancies, and that necessary precautions may be taken during the project planning phase to minimize impacts. Raptors are afforded seasonal and spatial protection as outlined in the existing RMP. Western Energy Alliance feels these measures are sufficient to mitigate potential impacts from oil and natural gas development. We urge BLM to ensure that any surveys or other project planning measures are carried out in a timely manner so as not to unnecessarily delay project activities.

Lands with Wilderness Characteristics

The EA states that development within areas with wilderness characteristics could lead to a loss of solitude and recreation in the vicinity of surface disturbance. However, the amount of potential surface disturbance identified, 43 acres, represents a very small

footprint, with effective interim reclamation reducing the initial footprint even further. The most conspicuous aspects of oil and natural gas development are in place for a very short period of time over the life of a well, and final reclamation practices have proven so effective in the past that areas with extensive historic development have even been proposed for formal wilderness designation. Therefore, any assertion that leasing and potential development would lead to any permanent loss of wilderness character is simply not accurate.

Recreation

The EA states that the potential recreation impacts would be focused on the loss of a sense of primitiveness while hunting, fishing, hiking, horseback riding, etc. Oil and natural gas development has a small surface disturbance and coexists with recreational uses. Companies mitigate potential impacts, and the most visible and audible aspects of development are short term. After development, the visible and audible components are greatly reduced, and after final reclamation virtually all traces of development are erased.

Conclusion

Domestic oil and natural gas development plays an important role in the economies of Grand and San Juan Counties, the state of Utah, and the nation while enhancing American energy security. Companies mitigate impacts and thoughtfully plan operations to protect resources and coexist with other multiple uses of public lands. We urge BLM to move forward with the sale of the remaining acreage with no further deferrals.

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

Sincerely,



Kathleen Sgamma
Vice President of Government & Public Affairs

Cc: The Honorable Gary Herbert, Governor, State of Utah
The Honorable Orrin Hatch, U.S. Senate
The Honorable Mike Lee, U.S. Senate
The Honorable Jason Chaffetz, U.S. House of Representatives
San Juan County Commission
Grand County Commission