



September 5, 2014

Via email: [lsfoweb@blm.gov](mailto:lsfoweb@blm.gov)

Bureau of Land Management  
Little Snake Field Office  
455 Emerson Street  
Craig, Colorado 81625

**RE: Western Energy Alliance Comments on the Environmental Assessment for the February 2015 Oil and Natural Gas Lease Sale – Little Snake Field Office**

Dear Sir or Madam:

Western Energy Alliance wishes to express its support for Alternative B, the Preferred Alternative. We urge BLM to move forward with offering the remaining parcels and refrain from 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 Colorado 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 Colorado, and the state's production is a strong contributor toward American energy security. In Colorado, oil and natural gas exploration and production supports over 60,000 high paying jobs with wages totaling over \$5 billion, an economic impact of over \$22 billion, and over \$2.3 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 112 parcels totaling 86,423.66 acres, of which 71 parcels totaling 55,198.26 acres were deferred due to BLM's determination of conflict with the Greater Sage-Grouse. 41 parcels totaling 31,225.4 acres, or 36% of the original amount remain available for lease.

BLM has indicated that the Little Snake Resource Management Plan (RMP) is currently being amended to address Greater Sage-Grouse management. 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 solely for the purpose of waiting for the completion of the new RMP.

### **Water Quality**

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 operation 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.

### **Air Quality**

We wish to point out that the act of leasing in and of itself will result in no impacts to air quality. There can be no assumption that a leased parcel will actually be developed, and therefore any attempts to quantify emissions are limited to conjecture. If and when development of a lease is proposed, the Colorado Department of Public Health and Environment (CDPHE) 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 CDPHE and EPA more than adequately address potential air impacts.

### **Wildlife**

Aside from the stipulations already attached to the parcels to protect species like big game, raptors, migratory birds, fish, and Threatened and Endangered and Sensitive Species, Conditions of Approval (COA) at the Application for Permit to Drill (APD) stage provide an additional layer of protections. Those species listed under the Endangered Species Act (ESA) require formal consultation prior to any surface disturbing activity, and raptors and migratory birds are both protected by the Migratory Bird Treaty Act (MBTA). There are many levels of protections for wildlife, and companies go to great lengths to avoid and minimize potential impacts to the greatest extent possible.

Page 3 of 3

**Socioeconomics**

As previously mentioned, the oil and natural gas industry creates a significant number of jobs in the State of Colorado, and generates billions of dollars in revenue for local, state, and federal coffers. Energy produced domestically reduces the need to import resources 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 allows the most potential development among alternatives analyzed, 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 Colorado, 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 John Hickenlooper, Governor, State of Colorado  
The Honorable Mark Udall, U.S. Senate  
The Honorable Michael Bennet, U.S. Senate  
The Honorable Scott Tipton, U.S. House of Representatives  
Moffat County Commission  
Routt County Commission