



July 14, 2014

Submitted via email to: [blm\\_ut\\_pr\\_mail@blm.gov](mailto:blm_ut_pr_mail@blm.gov)

Mr. Don Stephens  
Price Field Office  
125 South 600 West  
Price, UT 84501

**RE: Western Energy Alliance Comments, Environmental Assessment (EA), November 2014 Lease Sale, Price Field Office**

Dear Mr. Stephens;

Western Energy Alliance wishes to express its support for Alternative A, the Proposed Action for the upcoming November 2014 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 Utah and across the West.

Our industry plays an important role in the economic wellbeing of Utah, and the state's production is a strong contributor toward American energy security. In Utah, oil and natural gas exploration and production 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. These revenues are used to fund infrastructure, education, and other vital services for communities.

**Parcel Deferrals**

BLM originally received Expressions of Interest (EOIs) for 60 parcels, of which all or part of 17 were deferred due to conflicts with coal resources, and all or part of 34 were deferred due to BLM's determination of conflict with sage-grouse. The Proposed Action examines only 29 parcels covering 33,908 acres.

Western Energy Alliance expresses serious concern regarding BLM's commonplace deferral of such a high proportion of nominated parcels. Our members continue to be harmed by these indeterminate delays and deferrals, and we believe that BLM is not adhering to the approved RMP per 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.

We have previously contested BLM's decision to pull a large number of parcels in the area from sale immediately prior to auction. In this instance, all or part of 51 of 60 EOIs, fully 85%, were deferred. While nominally done to protect other resources, we wish to point

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out that oil and natural gas exploration and production is subject to myriad existing restrictions and mitigation and reclamation requirements to ensure the protection of other natural resources. Resource development can and does take place while protecting other resources on public lands; it is not an “either-or” situation.

### **Air Quality**

As the EA points out on page 20, the act of leasing itself will result in no impacts to air quality. If and when development of the lease takes place, the Utah Division of Air Quality (UDAQ) stringently regulates air emissions per the Clean Air Act (CAA) with strict permitting requirements before development can take place. The Environmental Protection Agency (EPA) has further imposed additional requirements for reducing emissions resulting from oil and natural gas development, including reduced emissions completions technology that captures the great majority of ozone precursors. Industry has made great technological strides in reducing air impacts, and we hold that the requirements mandated through UDAQ and EPA more than adequately address potential air impacts.

### **ESA Listed and Sensitive Plants**

The act of leasing itself does not authorize any surface disturbing activities. Before BLM would permit any development to occur, a detailed plan of operations must be drafted and reviewed, aspects of which would directly address avoidance and mitigation of impacts to sensitive plant species and compliance with the requirements of the ESA. We therefore urge that the full allotment of parcels contained in the EA be allowed to move forward for sale.

### **Water Quality and Riparian Areas**

The oil and natural gas industry takes numerous precautions to protect surface and underground water resources, including engineering techniques to minimize erosion and sediment runoff, protocols to guard against and address potential surface spills, and numerous layers of casing to prevent contaminants from escaping the wellbore and interfacing with water aquifers. BLM indicates on page 24 of the EA that No Surface Occupancy (NSO) lease stipulations are in place to protect waterways and other riparian areas. We believe that industry’s admirable track record of protecting water resources and the existing lease stipulations offer effective protections for water resources in the area.

### **Lands with Wilderness Characteristics**

The EA indicates that development may impact acreage that BLM has inventoried as having wilderness characteristics. However, these areas are non-Wilderness Study Areas (WSA), and are classified as “open to leasing”. In any case, resource development is a

small and temporary impact, and Western Energy Alliance objects to any notion that oil and natural gas development results in the irretrievable loss of primitive landscapes. Noise and sight mitigation techniques are effective at obscuring development processes while resource development is taking place, and reclamation practices have been effective to the point that areas with historic resource development have subsequently been proposed for Wilderness designation. Resource development and landscape protection are not mutually exclusive goals.

### **Conclusion**

Oil and natural gas production has played a historically significant role in the culture and economic livelihood of the State of Utah, 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 recently claim the mantle as the world's top producer of oil, and America remains leads the world in natural gas production. 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 the sale of the remaining acreage with no further deferrals. We appreciate the opportunity to comment. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Kathleen M. Sgamma  
Vice President of Government and 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  
Carbon County Commission  
Emery County Commission