



July 25, 2014

Submitted via email to: [blm\\_ut\\_mt\\_oq\\_leasing\\_comments@blm.gov](mailto:blm_ut_mt_oq_leasing_comments@blm.gov)

Mr. Cliff Giffen  
Moab Field Office  
82 East Dogwood  
Moab, UT 84532

**RE: Western Energy Alliance Public Scoping Comments, February 2015 Oil and Natural Gas Lease Sale, Moab and Monticello Field Offices**

Dear Mr. Giffen;

Western Energy Alliance wishes to express its support for the inclusion of all the nominated parcels in the Environmental Analysis (EA) for the upcoming February 2015 oil and natural gas lease sale. We urge the Bureau of Land Management (BLM) to refrain from deferring any parcels before they are afforded formal analysis under the National Environmental Policy Act (NEPA).

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 well-being 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, provides an economic impact of over \$3.4 billion, and contributes \$828 million in federal and state taxes. These revenues are used to fund infrastructure, education, and other vital services for communities.

**Areas Designated Open to Leasing**

According to the Federal Land Policy and Management Act (FLPMA), mineral exploration and production, including oil and natural gas development, is to be managed by the BLM as one of the "principle or major" uses of public lands. As such, BLM incorporates the potential for oil and natural gas leasing and development into its various Resource Management Plans (RMP) by designating specific areas as "open" or "closed" to leasing, and with specified stipulations. Per BLM Handbook H-1601-1, these land use plans remain the authoritative document until such time as they are amended or revised. According to the current Moab and Monticello RMPs, all lands nominated for lease in the February 2015 sale are designated as "open" to leasing, and therefore, each parcel should be allowed to move forward in the process.

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**Lease Deferrals**

The BLM assumes the discretion to temporarily defer parcels currently under review through Instruction Memorandum (IM) 2010-117. In recent lease sales, BLM Utah has exhibited a pattern of deferring a large proportion of the nominated parcels prior to the Environmental Analysis stage, most often due to their location within Greater Sage-Grouse (GrSG) Preliminary Priority Habitat (PPH). While we have opposed these indefinite deferrals in principle, we wish to point out that with the current slate of nominated parcels, none are located within GrSG PPH.

IM 2014-100 instructs the deferral of new oil and natural gas nominations in occupied Gunnison Sage-Grouse (GuSG) habitat, defined as the U.S. Fish and Wildlife Service's (FWS) "proposed occupied critical habitat". Though some of this habitat exists within the boundaries of the Monticello Field Office, a comparison of FWS's proposed occupied critical habitat maps with the location of the nominated parcels reveals that while a handful are within proximity, none appear to be located within this designation, and should not be subject to deferral.

**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 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 allow the nominated parcels to move forward in the NEPA process in preparation for the February 2015 lease sale. 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