



September 20, 2019

*Submitted via [eplanning.blm.gov](http://eplanning.blm.gov)*

Project Manager, Eastern Colorado RMP  
Bureau of Land Management  
Royal Gorge Field Office  
3028 East Main Street  
Cañon City, CO 81212

**Re: Draft Eastern Colorado Resource Management Plan & Environmental Impact Statement**

Dear Sir/Madam:

Western Energy Alliance appreciates the opportunity to comment on the Bureau of Land Management's (BLM) Draft Eastern Colorado Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The Alliance strongly supports adoption of Alternative C: Emphasis on Responding to Demand for Resource Use in the final EIS.

Western Energy Alliance represents over 300 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 independents, the majority of which are small businesses with an average of fourteen employees.

Alternative D in the draft RMP, the Preferred Alternative, would add significant restrictions on oil and natural gas development in the planning area compared to both the No Action Alternative and Alternative C. The Alliance supports Alternative C because it would provide for increased protections of other resource uses as compared to the No Action Alternative, without placing unduly burdensome restrictions on energy development as prescribed in Alternative D.

The Alliance supports BLM's multiple-use mandate, and where energy production exists, public lands are also available for other uses such as recreation, ranching, farming and hunting. By its nature, multiple use engenders coexistence, not competition. We can develop the energy on public lands that all Americans own while protecting the land, wildlife, air, water, cultural and other resources. Unfortunately, the Preferred Alternative would place restrictions on development that are unnecessary to achieve BLM's multiple use goals.

Each year, improvements in technology reduce the footprint of oil and natural gas development, and reclamation techniques continue to improve so that the impact to the land is small and temporary. Over the last decade, oil and natural gas development has

shifted from vertical wells with dense well-pad spacing to directional and horizontal wells with significantly less disturbance and fragmentation per section of land developed. One horizontal well now takes the place of 8 to 16 vertical wells, leading to reductions in well pad disturbances, linear disturbances, and disturbances due to human activity.<sup>1</sup>

After a well is drilled and completed, which usually takes just a few weeks to months, depending on how many wells are clustered on a pad, interim reclamation occurs and the surrounding land remains available for recreational and agricultural purposes. Once wells are plugged and abandoned and final reclamation occurs, the disturbance to the land is barely discernable, if at all.

Ultimately, the impacts of developing vital energy resources are temporary, and oil and natural gas development can and does coexist with other multiple uses. BLM should recognize these facts and not unreasonably preclude lands from oil and natural gas leasing.

Under the Preferred Alternative, however, there are numerous restrictions that would limit leasing. These include, but are not limited to, the following:

- “Notify the lessee that COAs [condition of approvals] would be applied to prohibit surface occupancy for oil and gas activities within 328 feet (100 meters) of waterways, including wetlands, perennial water impoundments, perennial streams, fens, and wetlands on BLM surface lands.”
- “Prohibit all surface-disturbing activities (including fluid mineral development) in important habitats for special status plant species, bald eagle, and golden eagle.”
- “Prohibit surface occupancy for fluid minerals in important habitats for prairie dog, blackfooted ferret, northern goshawk, ferruginous hawk, peregrine falcon, Mexican spotted owl, and lesser prairie chicken.”
- “Restrict surface use for fluid mineral development in important habitats for New Mexico and Preble’s jumping mouse, Mexican spotted owl, long-billed curlew, whitefaced ibis, least tern, piping plover, western snowy plover, yellow-billed cuckoo, southwestern willow flycatcher, special status amphibian and snake species, Pawnee montane skipper, and Uncompahgre fritillary butterfly.”
- “Notify the lessee that COAs would be applied to prohibit surface occupancy or use from oil and gas activities on BLM-administered surface lands within 328 feet (100 meters) of the boundary of significant eligible cultural resources, culturally

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<sup>1</sup> *Oil & Gas Impacts on Wyoming’s Sage-Grouse: Summarizing the Past & Predicting the Foreseeable Future, 8 Human-Wildlife Interactions*, David H. Applegate & Nicholas L. Owens, Fall 2014, 288.

sensitive locations, listed NRHP [National Register of Historic Places] sites/districts, outstanding cultural resources to be nominated to the NRHP.”

- “Manage fluid mineral leasing on federal mineral estate outside of South Park as:
  - o 67,000 acres closed
  - o 247,900 acres NSO
  - o 367,700 acres CSU
  - o 710,500 acres TL
  - o 1,530,300 acres open under Standard Terms and Conditions.”
- “Manage 68,300 acres in the following areas as WSAs under BLM Manual 6330 unless designated by Congress as Wilderness Areas or released for other purposes:
  - o Beaver Creek
  - o High Mesa Grassland Research Natural Area
  - o McIntyre Hills
  - o Lower Grape Creek
  - o Upper Grape Creek
  - o Manage WSAs to protect their wilderness characteristics if they are released by Congress until subsequent land use planning outlining management is completed.”

Each of these restrictions is a change to current management practices, and taken together they will severely impact the opportunity to responsibly develop oil and natural gas resources in the planning area. Alternative C, on the other hand, would allow for development while implementing measures such as surface use restrictions and timing limitations that would minimize impacts to wildlife, cultural and visual resources, and air and water quality. Those stipulations strike the proper balance between the multiple uses of public lands, and therefore Alternative C should be adopted in the final EIS.

Western Energy Alliance appreciates the opportunity to provide comments on the draft RMP. Today’s oil and natural gas technology is better, safer and more efficient than ever before in minimizing impacts. We urge BLM to choose the alternative that will balance reasonable protections for wildlife, cultural, and other resources with responsible oil and natural gas development. Please do not hesitate to contact me with any questions.

Sincerely,



Tripp Parks  
Vice President of Government Affairs