



June 17, 2016

Mr. Greg Larson  
Project Manager  
Bureau of Land Management  
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Road, Silt, CO 81652.

***RE: West Slope Colorado Oil & Gas Association and Western Energy Alliance Addendum to January, 2016 Comments on Draft Environmental Impact Statement for Previously Issued Oil and Gas Leases in White River National Forest, Colorado***

Mr Larson:

The West Slope Colorado Oil & Gas Association and Western Energy Alliance and the Colorado Oil & Gas Association highly criticized both the United States Forest Service and the Bureau of Land Management (BLM) for disregarding information provided about the value and importance of the Mancos Shale gas resource to our country, community and world. This criticism took the form of providing important information about the Mancos Shale during scoping, DEIS comments as well as during a protest conference held with the USFS prior to the agency finalizing a Forest Plan which all but eliminates future natural gas leasing.

We claimed the agencies, in a race to retroactively cancel and modify valid, existing oil and natural gas leases, completely ignored information submitted about the importance of the Mancos Shale gas resource throughout western Colorado.

Despite our organizations' good faith effort, our comments were summarily ignored and our claims about the new and emerging shale gas resource were glibly rejected by both Forest Service and BLM officials. This month, BLM's sister agency, the United States Geological Survey (USGS), announced not only that the Mancos Shale is much larger than assumed in the DEIS, but is in fact at least the second largest shale gas resource in the United States.

This announcement by USGS not only constitutes new information but is in fact "significant new information" that triggers a legal obligation for BLM to reopen and republish the draft EIS alternatives. After all, the Forest Service noted in its 2010 Reasonable and Foreseeable Development Scenario that "future development will follow past development trends." Only by canceling leases and blocking reasonable access to responsible development of the Mancos Shale on federal lands will that self-fulfilling prophecy come true. We rejected that false assumption then and are now joined by USGS in rejecting the underlying resource assumptions today.

Because the Colorado River Valley Field Office and White River National Forest host the second largest natural gas reserve in the United States, the agency's NEPA analysis can and must reflect this significant fact. The public should have the opportunity to comment on the creation of new alternatives. To not do so leaves the final EIS and Record of Decision legally indefensible. Specifically, the USGS announcement upends the validity of alternatives given the increase in resource isn't just a percent or two as assumed in the DEIS, but represents a 40-fold increase in technically recoverable natural gas within the White River National Forest.

The information BLM is using to justify canceling leases was derived from numerous and often biased sources, all of which are now rendered obsolete and inadequate. For example, the resource report commissioned by the Thompson Divide Coalition for the sole purpose of undermining our member companies and their Mancos leases is now completely irrelevant and the underlying data used are meaningless. The same is true for every calculation, assumption, socio-economic consideration and pretext used for lease cancellation in the DEIS.

While the goal of BLM's leadership in Washington may be to complete the record of decision at any and all cost before the November elections, we believe the most significant upward revision in the history of USGS, if ignored, will constitute arbitrary and capricious action rendering the ROD vulnerable to legal challenge. BLM must use the best available information and data in its NEPA analysis. It is difficult to comprehend how BLM could move forward with the current NEPA analysis while intentionally avoiding data provided by a sister agency.

Reopening the alternatives for public comment and curating the underlying NEPA and alternatives in an updated DEIS is the only way for the agency to account for this historic announcement by USGS.

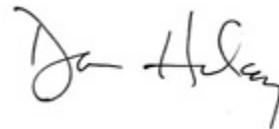
Thank you and best,



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