



June 13, 2016

Colorado River Valley Field Office  
Bureau of Land Management  
Attn: Draft Oil & Gas EA  
2300 River Frontage Road  
Silt, CO 81652

**RE: Environmental Assessment for the Grand Junction and Colorado River Valley  
Field Offices November 2016 Competitive Oil & Gas Lease Sale**

Dear Sir/Madam:

Western Energy Alliance wishes to express support for the upcoming November 10, 2016 oil and natural gas lease sale of parcels in the Grand Junction and Colorado River Valley Field Offices. We urge the Bureau of Land Management (BLM) to refrain from deferring any parcels from the sale, as they have undergone the necessary analysis in accordance with the National Environmental Policy Act (NEPA). Furthermore, we suggest BLM consider conducting the lease sale online in order to avoid the disruptive activity that has plagued recent lease sales in Colorado and across the West.

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 fifteen employees. Oil and natural gas development, including on public lands, plays an important role in the economic well-being of Colorado, and our members are proud to provide jobs and royalty revenue that funds vital services for the state and nation. Oil and natural gas provides the large majority, 71%, of economic activity on Colorado BLM lands—\$4.7 billion of the \$6.6 billion value, from BLM's own estimates.

Since leasing policy changes enacted in 2010, BLM has not been holding statewide sales each quarter, as envisioned by Congress in the Mineral Leasing Act. Rather, field offices participate in only one quarterly sale per year, greatly extending the time span from nomination to sale, as companies must wait until the one yearly sale designated for the planning area where their parcels of interest are located—a sale which has often been postponed or canceled.

Because of this needless restriction, parcels in the Grand Junction and Colorado River Valley Field Offices have not been offered for sale since August 2012 and August 2011, respectively. As such, we wish to emphasize the need to conduct a robust November 2016 sale of all identified parcels, with no further deferrals. Interested companies rely upon regular lease sales in order to evaluate their future development plans, and unnecessary,

years-long delays only further discourage oil and natural gas development on federal lands.

BLM originally received Expressions of Interest (EOI) for thirty-one parcels totaling 25,470.43 federal mineral acres in the planning area, of which seven were deferred due to BLM's determination of conflicts with the Greater Sage-Grouse. We are disappointed that BLM made that determination, as there are stipulations that can be imposed to protect the sage grouse without further delaying leasing of these parcels. Nonetheless, under the preferred alternative BLM only plans to offer 18,349.47 acres for sale in November. We urge BLM not to further defer acreage prior to the lease sale.

In addition to BLM policies that are limiting sales, several environmental groups have begun a campaign to stop all oil and natural gas leasing on federal lands. Dubbed Keep-It-in-the-Ground, the movement is motivated by an agenda of ultimately stopping all fossil fuels, which of course would be devastating for the entire economy, not to mention the quality of life and safety of all Americans. Keep-It-in-the-Ground activists have employed intentionally disruptive tactics at recent lease sales in an attempt to shut down oil and natural gas leasing.

Although we appreciate BLM's efforts to conduct safe and orderly lease sales in the face of these disruptive tactics, we suggest that BLM take advantage of the online auction option for the November 2016 sale. Congress has authorized online auctions in lieu of in-person sales, and this approach will allow BLM to fulfill its statutory obligations without the threat of disruption. Online auctions also have added cost-savings benefits as venues and security personnel do not have to be enlisted to handle potentially unruly crowds.

We urge BLM to allow all parcels analyzed in the EA to move forward for the November 2016 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: Ruth Welch, State Director, Colorado BLM  
Lonny Bagley, Deputy State Director, Energy Lands & Minerals  
Sue Mehlhoff, Branch Chief, Fluid Minerals