



July 14, 2016

Submitted via e-mail to BLM_UT_Vernal_Comments@blm.gov

Stephanie Howard
Vernal Field Office
Bureau of Land Management
170 South 500 East
Vernal, UT 84078

RE: Environmental Assessment for the Vernal Field Office November 2016 Oil and Gas Lease Sale

Dear Ms. Howard:

Western Energy Alliance wishes to express support for the upcoming November 15, 2016 oil and natural gas lease sale of parcels in the Bureau of Land Management's (BLM) Vernal Field Office. However, we are disappointed that BLM plans to defer the vast majority of parcels and acreage nominated from the November lease sale, and we urge BLM to offer these parcels at the February 2017 lease sale. Furthermore, we suggest BLM consider conducting the lease sale online in order to avoid the disruptive activity that has plagued recent lease sales in Utah 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 Utah 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 Utah, and our members are proud to provide jobs and royalty revenue that funds vital services for the state and nation.

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 (MLA). 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.

BLM originally received Expressions of Interest (EOI) for 102 parcels totaling 95,880 federal mineral acres in the planning area. BLM is now only offering 28 parcels totaling 12,344 acres, as more than 87% of the nominated acres have been deferred. We strongly disagree with BLM's decision to defer 74 nominated parcels, especially as many of these parcels have been nominated in past years and are again being deferred. Companies rely upon regular lease sales in order to plan future development, and years-long delays only further discourage oil and natural gas development on federal lands. Parcels deferred in

the EA will not be available for leasing until at least November 2017 if BLM continues its current rotational leasing practice, and any parcels that are deferred will experience an unacceptable delay of several years. Instead, BLM should make these parcels available at the earliest possible lease sale, in February 2017.

We are especially concerned that 28 parcels are being deferred because of Greater Sage-Grouse (GrSG). In September 2015 BLM finalized an amendment to the 2008 land use plan for the Vernal Field Office to specifically provide for GrSG protections in the planning area. The plan amendment provided protections such as timing stipulations and buffers which should allow oil and natural gas development to proceed forward. The plan took years to develop, and leasing in GrSG habitat was repeatedly delayed while the plans were being finalized. Now that the Record of Decision has been signed and the plans are in force with strong protections, leasing in GrSG should proceed forward. The justification offered for further delays is illegitimate: “[t]his deferral was made consistent with the BLM’s sage-grouse conservation plans and strategy, which direct the BLM to prioritize oil and gas leasing and development in a manner that minimizes resource conflicts in order to protect important habitat.” BLM is using the plans to enact a *de facto* ban on oil and natural gas development in sage grouse habitat.

Furthermore, the remaining 51 deferrals are the result of the state director’s discretion, recreation concerns, and other wildlife species. As discussed above, however, the land use plan for the Vernal Field Office contains stipulations on oil and natural gas leasing that provide protections for wildlife and recreation concerns. Oil and natural gas development can coexist with other land uses, as the plan rightly indicates. We urge BLM to reconsider and offer these parcels for lease.

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 they would 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 make all deferred parcels available at the next lease sale on February 21st, 2017, and we encourage BLM to consider conducting the November lease sale online.

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Thank you for 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