



June 13, 2016

Royal Gorge Field Office
Bureau of Land Management
Attn: Draft Oil & Gas EA
3028 East Main
Canon City, Colorado 81212

**RE: Environmental Assessment for the Royal Gorge Field Office 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 Royal Gorge Field Office. 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 quarter designated for the planning area where their parcels of interest are located.

Because of this needless restriction, parcels in the Royal Gorge Field Office have not been offered for sale since November 2015, and a cancellation or postponement could create a two year gap between sales in this field office. 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 evaluated only eight parcels totaling 2,038 acres under the EA, and two parcels totaling 236 acres were deferred due to BLM's determination of conflicts with the Lesser Prairie Chicken (LPC) and the possible presence of a National Historic Trail. We are disappointed that BLM made that determination, as there are stipulations that can be imposed to protect both resources. Additionally, the small amount of acreage would be negligible compared to the vast range of the LPC, and the lack of specification on the historic trail seems somewhat specious. Nonetheless, under the preferred alternative BLM only plans to offer 1,801.6 acres for sale in November. This amount of acreage is already very small, and 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