



December 5, 2016

*Submitted via e-mail to [jbierk@blm.gov](mailto:jbierk@blm.gov)*

John Bierk  
State Chief Ranger  
BLM Colorado State Office  
2850 Youngfield Street, Lakewood, CO 80215

**Re: Proposed Supplementary Rules for Public Lands in Colorado**

Dear Mr. Bierk:

Western Energy Alliance supports the proposed supplementary rules to protect natural resources and provide for public health and safety on public lands and BLM facilities in Colorado. We are particularly supportive of rules 1 through 11, which would ensure BLM staff and the public are able to engage in oil and natural gas lease sales and other normal business functions without disruption.

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. Alliance members are independents, the majority of which are small businesses with an average of fifteen employees. Individual employees of our member companies frequently conduct business at BLM facilities, including participating in lease sales and routine interactions with BLM staff, and their safety when conducting such business should never be threatened.

The proposed rules include commonsense prohibitions on disruptive and lewd behavior that accord with reasonable standards of decency. The fact that BLM is compelled to issue these rules at all indicates a heightened level of concern regarding the behavior of certain malcontents at recent events, and speaks to the unruly tactics of the groups who organize these bad actors. In fact, BLM Director Neil Kornze, in testimony before Congress, compared the threat they pose to BLM employees as similar to that by armed militias that occupied Malheur Wildlife Refuge.<sup>1</sup> We share BLM's concern and appreciate its prudent response.

On several instances in 2016, BLM has attempted to conduct oil and natural gas lease sales only to be interrupted by protestors who have threatened to overwhelm available facilities and disrupt the sale. These threats have caused the postponement of sales across the West and have raised the costs associated with successful sales via venue changes and

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<sup>1</sup> Examining the Bureau of Land Management Public Lands Leasing: Hearing before the Committee on Oversight and Government Reform, U.S. House of Representatives, March 23, 2016.

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security personnel. Since BLM is required by statute to conduct regularly-scheduled quarterly lease sales, continued disruptions threaten to force BLM to violate the law.

While we respect the right to peacefully assemble, these protests have repeatedly taken an ugly and aggressive turn, and BLM is right to be concerned about future events. We applaud BLM's separate action of transitioning to an online lease sale system, which will limit the opportunities for disruptive protests. For any protests that do occur, proposed rules 1 through 11 make clear that behavior that is disruptive, disorderly, or indecent is unacceptable and will not be tolerated on public lands and at BLM facilities.

BLM should adopt the proposed supplementary rules to ensure the public is safe and business can be conducted in an orderly fashion. Thank you for the opportunity to comment on these rules, and please do not hesitate to contact me with any further questions.

Sincerely,



Kathleen M. Sgamma  
President