



April 10, 2017

Submitted via email to: blm_co_may_2017_lease_sale@blm.gov

BLM Colorado State Office
2850 Youngfield St.
Lakewood, CO 80215

RE: Letter of Support for the June 9, 2017 Quarterly Oil and Gas Lease Sale

Dear Sir/Madam:

Western Energy Alliance wishes to express support for the upcoming June 9, 2017 oil and natural gas lease sale of parcels in the White River, Little Snake, and Kremmling Field Offices (June lease sale). 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).

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.

BLM finalized the Resource Management Plan (RMP) for the Kremmling Field Office in June 2015, amended the White River RMP for oil and gas development in 2016, and finalized the Little Snake RMP in 2011. These documents provide the basis for oil and natural gas leasing in the planning areas, and they have all been updated recently. All three documents place numerous restrictions on oil and natural gas development and enact conservation measures to prevent adverse impacts from leasing.

Despite these protections, the Grand County Board of County Commissioners filed a protest to the June lease sale, citing numerous concerns with oil and natural gas leasing within the county. The concerns lead them to ultimately request the "BLM Kremmling Field Office initiat[e] a revision to the Resource Management Plan for the closure of all of Grand County's portion of the Kremmling Resource Area to oil and gas development."

The time to raise concerns over oil and natural gas development in Grand County was during the RMP process, not during a lease sale that is consistent with an RMP that is less than two years old. BLM is tasked with a multiple-use mandate under the Federal Land Policy Management Act (FLPMA), and accordingly it allowed for resource development in Grand County with appropriate restrictions to protect air, water, wildlife and the land. The

stated intent of the Commissioners' protest would have BLM violate the multiple-use mandate, and BLM must refrain from doing so.

The protest begins by questioning the viability of the parcels as a developable resource based on geology, access, and potential for significant development. Of course, companies take all these factors into account when deciding where and when to lease. If there is truly no interest in the Grand County parcels, then there will be zero bids and the Commissioners should have no reason for concern. If there are bids, however, then the claim that the parcels are nonviable is incorrect and should be ignored. In either scenario, the argument fails to be persuasive as a reason to cancel leasing of Grand County acreage.

The Commissioners also raise numerous concerns with oil and natural gas development in the protest letter, but these concerns can be and have been addressed through the NEPA process. For instance, the protest cites threats to sagebrush vegetation and nesting habitat for raptors as causes for concern. Sagebrush habitat is aggressively protected through the BLM Sage Grouse Final Environmental Impact Statement, which the protest references, and the [Kremmling RMP](#) specifically places a no surface occupancy (NSO) restriction within 0.5 miles of raptor nest sites. To suggest that these habitats would be threatened by the lease sale is to ignore the strict protections in place in NEPA documents that cover Grand County.

The NSO restriction around raptor nests is just one of a great number of stipulations that are attached to all the parcels offered for lease. Other examples include timing restrictions for big game hunting and Columbian sharp-tailed grouse nesting and winter habitat, controlled surface use for fragile soils and steep slopes, and NSO for priority habitat for the Greater Sage-Grouse.

The protest suggests that oil and natural gas development is a threat to air quality in the county, and states that "fracking...is hazardous to the health of residents near wells." The Colorado Department of Public Health and Environment (CDPHE) recently released an assessment that found just the opposite, specifically stating that "the risk of harmful health effects is low for residents living near oil and gas operations."¹

Methane and other greenhouse gas emissions are also listed as a concern in the protest. In fact, oil and natural gas development has been a primary driver in *decreasing* emissions across the United States. Since 1990, oil and natural gas producers have decreased methane emissions by 21% even as natural gas production has climbed 52%, according to the [Environmental Protection Agency](#) (EPA).

The State of Colorado also has some of the most stringent oil and natural gas facility emission standards in the entire country. In 2014, CDPHE developed Regulation No. 7 to require volatile organic compound and nitrogen oxide controls on both new and existing

¹ [Assessment of Potential Public Health Effects from Oil and Gas Operations in Colorado](#), Colorado Department of Public Health and Environment, February 21, 2017.

oil and natural gas facilities statewide. CDPHE's standards require controls for newly constructed, hydraulically fractured, or recompleted wells, storage tanks, pneumatics, compressors, dehydrators, liquids unloading, and fugitive emissions. New air quality rules from EPA and BLM were modeled in part on Regulation No. 7, and in several instances, Colorado's rules remain more stringent than the newest federal standards. CDPHE, BLM, and EPA did not find credible evidence that more stringent standards are necessary or appropriate for protecting public health and the environment. The oil and natural gas industry's success in reducing emissions is making our air cleaner, not more polluted as alleged in the protest.

The Commissioners express concern that cultural and historic resources will be disturbed by development. The [Kremmling RMP](#) specifically provides protections for these resources. Surface occupancy and surface-disturbing activities are prohibited "within a 100-meter-wide protection boundary around known historic properties, traditional cultural properties, listed National Register sites/districts, outstanding cultural resources to be nominated to the National Register of Historic Places (NRHP), interpreted and/or public use sites, and experimental use sites." Clearly BLM has already contemplated protection of cultural and historic resources, so the lease sale will have no effect.

Finally, the protest expresses concern that Rocky Mountain National Park (RMNP) "is only seven (7) miles from the eastern edge of the proposed oil and gas lease sale," and suggests this is a reason not to lease. The boundaries of RMNP were set for a reason, and there is no justification for extending restrictions on development beyond them. The Commissioners suggest that having to drive past oil and natural gas wells in order to reach RMNP "would severely lessen the attraction of visiting this priceless resource." That assertion is not only facially farcical, as it suggests the mere sight of wells will be enough to dissuade tourists from visiting the beautiful park or otherwise ruin the experience, but it also fails to consider how small an impact development would have on the landscape.

The oil and natural gas industry has undergone a significant technological transformation in the past decade. Horizontal and directional drilling, paired with advanced hydraulic fracturing, dramatically reduce the industry's operational footprint. Companies have dramatically shrunk the footprint of development on the landscape.

A 2014 peer-reviewed study in the journal [Human-Wildlife Interactions](#) found that modern oil and natural gas operations result in a 70% reduction in surface disturbance. Such reductions are possible because a single horizontal well now takes the place of 8 to 16 vertical wells, and up to 32 directionally drilled wells can be clustered on one pad. Reducing surface disturbance allows companies to develop resources while having minimal impact on the land. Leasing these acres will not substantially affect visitors to RMNP, especially at a significant seven-mile distance.

The parcels that are targeted by the Commissioners' protest total 27,500 acres, and only a small fraction of that total will eventually be disturbed by oil and natural gas development

through the lease sale. The scope of this sale is especially reasonable when compared to the backlog of millions of acres waiting to be leased in states across the West. BLM has fully evaluated the disturbance contemplated in this sale, and has appropriately tailored the leases to minimize impacts.

Oil and natural gas development on the proposed federal leases will provide numerous benefits to the economics of the State of Colorado and Grand County, and any adverse impacts envisioned in the Commissioners' protest can and will be avoided through the numerous lease stipulations. We therefore urge BLM to allow all 106 parcels covering 101,031 acres analyzed in the EA to move forward for the June 2017 lease sale. These parcels have been the subject of a year-long public analysis in compliance with NEPA and FLPMA, and the concerns listed in the Commissioners' protest were already addressed through the Kremmling RMP. The lease sale should proceed for all parcels. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Tripp Parks
Manager of Government Affairs