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# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Wyoming State Office  
P.O. Box 1828  
Cheyenne, Wyoming 82003-1828



**Note:** Mailing list of recipients attached.

Dear: Operator

Peer-reviewed, published research indicates that Coalbed Natural Gas (CBNG) development is having negative impacts to long-term Sage grouse population levels. The Bureau of Land Management (BLM) has been participating in discussions with the Petroleum Association of Wyoming (PAW), the Governor of Wyoming, and the academic community to develop an approach to continue coalbed natural gas development, while not compromising the overall population of Sage grouse in Wyoming.

Many operators have Plans of Development (PODs), Applications for Permit to Drill (APDs), or rights-of-way (ROWS) applications pending, or prepared for, submittal to our Buffalo Field Office that are wholly, or partially, within high quality Sage grouse habitats. The BLM's 2003 Powder River Basin oil & gas Environmental Impact Statement and Record of Decision determined that adaptive management would be employed to manage energy development in the Powder River Basin. This letter is to advise you of BLM's approach to processing permits in these areas in response to the findings of Sage grouse research and BLM's adaptive management approach.

The BLM, Wyoming Game and Fish Department and researchers have identified high quality Sage grouse habitat areas. These areas have been referred to as "Sage grouse planning polygons" and have become the subject of considerable discussion and concern. The BLM is hopeful that the efforts of PAW can provide practices that can be implemented that allow continued CBNG development in these areas. The BLM will need to prepare additional National Environmental Protection Act (NEPA) and/or planning documents to integrate this information into our future decisions.

The BLM Wyoming is currently developing interim guidance for processing energy actions in Sage grouse habitats and more specifically for the Powder River Basin. In light of the above, the following actions will be taken in the Powder River Basin:

1. Decisions on APD/POD/ROW applications that lie within identified high quality Sage grouse habitat will be processed by completing NEPA analysis that incorporates the findings of the recent peer reviewed research. Operators may amend their current applications in the Buffalo Field Office to exclude actions in the high quality Sage grouse habitat areas if they wish to continue the processing of their applications in the short-term.
2. The Buffalo Field Office will give a priority to processing APD/POD/ROW applications that are outside of these identified high quality sage grouse habitats and submitted in lieu of previously submitted applications that would be processed in number 1, above.
3. Operators with innovative ideas for CBNG development in the high quality Sage grouse habitat areas should initiate discussions with the Buffalo Field Office and share those ideas with the industry representatives on the Governor's task force that was formed in follow-up to the recent Sage grouse summit. The Buffalo Field Office will consider applications with innovative ideas on a case-by-case basis and in consultation with this office, may proceed to process applications incorporating approaches which appear to have a high likelihood of success.
4. Operators/lessees whose leases would be adversely affected by this action may request a suspension of operations and/or production through the Buffalo Field Office.

The collective efforts between the minerals industry, the ranching community, and involved Government agencies should provide the innovation and commitment necessary to recover the CBNG resources without putting the Sage grouse population in jeopardy.

If you have questions about this approach, please contact either Alan Rabinoff at 307-775-6148 or Jane Darnell at 307-775-6113 in this office or Chris Hanson in our Buffalo Field Office at 307-684-1141.

Sincerely,

*/s/ Alan Rabinoff*  
for Robert A. Bennett  
State Director

cc:  
Field Manager, Buffalo