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September 3, 2010

VIA ELECTRONIC MAIL

Ms. Sarah Bucklin
Wyoming High Plains District Office
Bureau of Land Management
2987 Prospector Drive
Casper, WY 82604

Re: Wright Area Coal FEIS

Dear Ms. Bucklin:

On behalf of Ark Land Company ("Ark Land"), we respectfully submit these comments to the Final Environmental Impact Statement ("FEIS") for the Wright Area Coal project, as noticed in the Federal Register on August 20, 2009 (74 FR 42092).

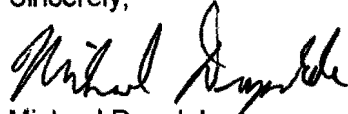
As you may know, since the release for publication of the Draft and Final Environmental Impact Statements for the Wright Area Coal Project, several environmental groups have filed challenges to the BLM's process for leasing coal in the Powder River Basin. See *WildEarth Guardians, et. al. v. Salazar* (D.D.C. Civ. No. 1:10-cv-01174-CKK); *WildEarth Guardians v. Salazar* (D.D.C. No. 1:10-cv-01133-JDB). There is no need to provide a detailed rebuttal to the Plaintiffs' arguments in this forum, but Ark Land would note that a principal theme of Plaintiffs' cases is that the current leasing process results in the leasing of excessive quantities of federal coal, at the alleged behest of the applicant coal companies. That the BLM is somehow beholden to coal company applicants is belied by the fact that the BLM has routinely added lands to the applications submitted, as is reflected in the recently issued Records of Decision for the West Antelope II, Belle Ayr North, and Caballo West lease applications. In the Wright Area Coal project FEIS, the BLM has also studied several alternatives providing for more extensive leases than applied for by Ark Land.

Such lease modifications are plainly within BLM's discretion, and Ark Land further notes that additional acreage variations within the scope of the NEPA study, such as those identified in the recent Wright Area proposed tract delineation, fall within BLM's authority as leasing agency. In light of plaintiffs' allegations, it may be helpful in issuing the Record of Decision for the Wright Area Coal Project to specifically articulate the many factors that inform BLM's ROD and subsequent leasing decisions, including preservation of the coal resource, optimization of bonus bids, and maintenance of market pricing and supply, consistent with BLM's multiple use and environmental protection mandates.

Ms. Sarah Bucklin
September 3, 2010
Page 2

Thank you for your consideration of these comments.

Sincerely,



Michael Drysdale

MD/aj

cc: Doug Downing
Dave Finnerty
Steven Beil
B.J. Sturgill
William Prince