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December 30, 2015

Leslie Wilcken
Bureau of Land Management
440 West 200 South, Suite 500
Salt Lake City, Utah 84101-1345

Re.: Expression of Interest, November 2016 Federal Oil and Gas Lease Sale

Sent via email: lwilcken@blm.gov

Dear Ms. Wilcken:

We represent a number of clients that are actively engaged in environmentally responsible exploration and production of oil and natural gas resources in the Uinta Basin, Utah. On behalf of these clients, please accept this expression of interest for the parcels identified on the enclosed spreadsheet for the upcoming November 2016 Green River District Office oil and gas lease sale.

We note that, while *all* of the lands identified in the enclosed spreadsheet are legally available for leasing, a number of these lands have previously been nominated within the last several years, but have either not been carried through for analysis in the pre-sale Environmental Assessment or deferred. For the reasons discussed herein, we believe that all lands nominated by this letter should be analyzed for leasing in the Environmental Assessment and included in the Notice of Competitive Lease Sale ("NLCS") for the November 2016 Green River District Office oil and gas lease sale.

All Nominated Lands Should be Evaluated for Leasing

All parcels identified in the attached spreadsheet are legally available for leasing. Some of the lands identified on the attached are split estate lands with private surface ownership. For these lands, we have provided the name and address of the surface estate owner in column C. BLM is the surface management agency for the majority of the parcels identified, with the

Bureau of Reclamation being the surface management agency for several parcels, as identified in column C.¹

None of the parcels identified in the attached have been offered for competitive lease within the last two years. Further, none of the minerals underlying these lands have been withdrawn from mineral leasing, and none of the lands are within incorporated cities, towns or Indian Reservations² or have patented mining claims or pending mineral entry applications. As such, all parcels identified herein are legally available for leasing and should be included in the November 2016 Green River District Office oil and gas lease sale.

The Vernal RMP

Under the Vernal Field Office Resource Management Plan (“RMP”), all of the lands nominated herein are open for oil and gas leasing, either with standard stipulations, controlled surface use/timing stipulations or major constraints. In selecting these lands for inclusion in this expression of interest we have included only lands that conform to the requirements for leasing discussed in the RMP and contain limited resource conflicts. For example, we have been careful to ensure that none of the lands identified herein embrace Areas of Critical Environmental Concern, Wilderness Study Areas, Wild and Scenic Rivers, Special Management Areas, or contain critical habitat for any species listed under the Endangered Species Act, 16 U.S.C. §§ 1531-1599.

As outlined by the Federal Land Policy and Management Act (“FLPMA”), 43 U.S.C. § 1701(a)(12), BLM’s governing statute, oil and gas leasing is a principal use of public lands. Indeed, FLPMA’s policy statement clearly sets out that it is the policy of the United States that “the public lands be managed in a manner which recognizes the Nation’s need for domestic sources of minerals . . . including implementation of the Mining and Minerals Policy Act of 1970,” an Act which, as to public lands, calls on the federal government to “foster and encourage private enterprise in . . . the development of domestic mineral resources.” 30 U.S.C. § 21a. Congress reaffirmed this commitment to responsible energy development on public lands with the passage of the Energy Policy Act of 2005, 42 U.S.C. §§ 15921-15928, which aimed to streamline the oil and gas leasing and permitting process on federal public lands. Accordingly, Congress has made clear numerous times that BLM must take its multiple use mandate seriously and, when appropriate under the governing land use plan, prioritize energy development on public lands.

¹ We note that it is an open question whether the Ute Tribe of the Uintah and Ouray Reservation may have some interest in the surface (bed and banks) of the nominated containing the bed of the Green River in Section 35, Tract A, Township 11 South, Range 18 East, SLM. Nonetheless, given that there is no question as to ownership of the mineral estate, which lies firmly in the federal public domain, this parcel should be included in the November 2016 Green River District Office sale.

² A majority of the lands nominated by this letter are within exterior boundaries of the Uncompaghe Indian Reservation and some questions persist concerning jurisdiction. *See, e.g., Ute Indian Tribe v. Utah*, 773 F.2d 1087 (10th Cir. 1985).

The FLPMA RMP is a comprehensive statement of land management priorities that provides a “rational, consistently applied set of regulations and procedures.” 43 C.F.R. § 1601.0-2. The RMP determines whether an area is open for oil and gas leasing and establishes the baseline protections necessary for resource conservation. Under section 202 of FLPMA, 43 U.S.C. § 1711, management decisions regarding lease parcel offerings must be guided by the governing RMP. We recognize that the Secretary of the Interior, or designee, retains considerable discretion in determining which lands to offer for competitive lease. However, as set forth in FLPMA, the RMP must govern these leasing decisions, 43 U.S.C. § 1711, and BLM is not free to defer lands from leasing on an *ad hoc* basis.

Here, the 2008 VFO RMP and its amendments are the documents that must govern BLM decisions as to whether certain parcels should be offered for lease. The parcels nominated in this letter are all designated as “open” for oil and gas leasing by the 2008 RMP and, consistent with national policy and statutory requirements, should therefore be offered at the upcoming November 2016 lease sale. We ask that in making lease parcel determinations for this lease sale, BLM rely on the 2008 Vernal RMP and applicable amendments and include all nominated parcels in the NCLS for the sale.

Prior Deferrals

Portions of many of the lands identified in the attached spreadsheet have previously been deferred from prior oil and gas lease sales, including the sale that was recently rescheduled from November 2015 to February 2016. The reasons for the deferral of the lands included in this expression of interest include the presence of White Tailed Prairie Dog colonies,³ Greater Sage-Grouse priority habitat management areas,⁴ Yellow-billed Cuckoo habitat (although not designated critical habitat),⁵ and the presence of cultural resources.⁶ However, because any resource conflicts related to BLM’s stated reasons for deferral could be addressed through stipulations and site-specific conditions of approval, none of these reasons provides adequate justification for BLM’s failure to offer these parcels for lease. This is particularly true given that the Vernal RMP designates these lands as open and available for oil and gas leasing.

Indeed, neither the Vernal RMP nor any other statute, regulation or BLM document contains any authority either requiring or justifying deferral of parcels for the stated reasons. First, as to the presence of habitat for species listed under the Endangered Species Act, no prohibition on leasing these lands exists and BLM has numerous management options available

³ Sec. 30: Lots 1-4, E½W½ and Sec. 31: All, T. 6 S., R. 20 E., SLM; Sec. 6: Lots 1-5, S½NE¼, SE¼NW¼, T. 8 S., R. 22 E., SLM; and Sec. 14: Lots 1-3, NW¼, N½SW¼ and Sec. 15: All, T. 9 S., R. 19 E., SLM.

⁴Sec. 33: NW, N2NE, SWNE, NWSE, Sec. 33: SW, S2SE, NESE, SENE, Sec. 34: N2, SE, Sec. 34: SW and Sec. 35: All, T. 6 S., R. 20 E., SLM; Section 3: All, Section 6: All, Section 7: All, Section 10: All, Section 11: All, Sec. 12: Lots 1, 2, 7, 8, S½, Sec. 14: NENW, W½W½ and Sec. 15: All, T. 6 S., R. 21 E., SLM; and Sec. 11: NE¼NE¼, T. 11 S., R. 20 E., SLM.

⁵ Sec. 1: Lots 5, 6, 7 and Sec. 13: Lot 5, T. 9 S., R. 19 E., SLM.

⁶ Sec. 13: E½NE¼, SW¼NE¼, E½SW¼, SE¼, T. 9 S., R. 19 E., SLM; and Sec. 28: E½SE¼, SW¼SE¼ and Sec. 33: Lots 1, 2, 3, SE¼NE¼, NW¼, N½SE¼, T. 11 S., R. 15 E., SLM.

that will allow leasing of these parcels to go forward while still providing adequate protections for the species. These options include limitations on surface disturbance, requiring setbacks or timing and/or seasonal limitations that will prevent disturbance during specified timeframes. In fact, as to areas with important White-Tailed Prairie Dog complexes, rather than closing the areas to oil and gas leasing, the RMP provides that habitat would be protected by “limiting OHV travel to designated routes, and limiting surface disturbance associated with oil and gas leasing through controlled surface use.” *See* Approved Vernal RMP at 11, 39-40.

Similarly, while the Western Yellow-billed Cuckoo is not discussed in the RMP, any conflicts associated with the presence of cuckoo habitat could be addressed through a site-specific condition of approval requiring compliance with the Fish and Wildlife Service’s standardized Yellow-Billed Cuckoo conservation and mitigation measures or through a blanket leasehold stipulation. Likewise, the presence of cultural resources should be managed through adherence to the Vernal RMP’s management decisions for cultural resources, RMP at 72-77 (CUL 1-34), and application of appropriate stipulations, RMP App. K, rather than a simple decision not to lease the parcels.

As to BLM’s decision to defer parcels from leasing that are within Sage-Grouse priority habitat management areas, now that the Utah Greater Sage-Grouse Land Use Plan Amendment has been finalized and implemented, parcels in priority habitat management areas should be offered for lease consistent with the terms of the Land Use Plan Amendment. In the past, BLM has deferred leasing numerous parcels in the Uinta Basin in anticipation of completion of the Sage-Grouse Land Use Plan Amendment, which was completed and finalized in September 2015. Because the Plan Amendment has now been finalized, BLM should no longer defer lands from leasing because of the presence of Sage-Grouse, but should instead offer the parcels for lease consistent with the terms of the Plan Amendment. Under the Plan Amendment, areas designated as priority habitat management areas may still be made available for oil and gas leasing, subject to no surface occupancy stipulations. *See* Utah Greater Sage-Grouse Approved Resource Management Plan Amendment § 2.2.6. Thus, at the very least, these parcels should be offered with the Plan Amendment-required no surface occupancy stipulation.

Under FLPMA, management decisions regarding land use planning—including a determination as to what lands are open to oil and gas leasing—is a public process that must be undertaken with appropriate public notice and comment. This, at the very least, requires a notice of intent to amend the governing land use plan, a period for public comment, and the requisite NEPA analysis and documentation. BLM IM 2004-110 makes clear that “all Field Offices are expected to follow their respective approved land use plans in offering for sale parcels with expressions of interest,” and “fluid mineral leasing allocation decisions are made at the planning stage.” The Utah State Office’s continued deferral of certain parcels in the Uinta Basin that are “open” to leasing under the VFO RMP amounts to *de facto* land use planning, in violation of FLPMA’s public process requirements.

Accordingly, rather than continue to defer these parcels because of potential resource conflicts, BLM should instead offer these parcels for competitive lease with appropriate stipulations that are outlined in the RMP and applicable amendments. If any additional resource conflict concerns were to be found at the site-specific development phase, these conflicts would be fully analyzed during site-specific NEPA analysis and could be addressed through applicant committed mitigation measures or the imposition of conditions of approval on the drilling permits. This would conform to the requirements of the governing RMP and fulfill BLM's multiple use mandate, while at the same time providing measures that would protect wildlife and cultural resource values.

Lands with Wilderness Characteristics and the Gasco EIS

We note that some of the lands identified on the attached spreadsheet are designated as non-wilderness study area lands with wilderness characteristics ("LWC").⁷ These lands are located generally around the Desolation Canyon LWC inventory area. Under the Vernal RMP, non-wilderness study area LWCs are broken into two categories: (1) those that are to be managed to "protect, preserve and maintain" wilderness characteristics, including closing the lands to oil and gas leasing; and (2) those that have no such management proscriptions. The LWCs in the Desolation Canyon area fall into the latter category, and there are no prohibitions on leasing these lands. *See* Vernal RMP Figure 12b, *Non-WSA Lands with Wilderness Characteristics*; Vernal RMP at 101-102, Management Decisions WC-1 and WC-2. Instead, under the RMP, these lands are designated as open to leasing, either with major constraints, timing or controlled surface use stipulations, or standard stipulations. *See* Vernal RMP Figure 8b. Accordingly, in conformity with the approved Vernal RMP, these lands should be made available for leasing, subject to the constraints and stipulations outlined in the RMP.

We also note that, previously, BLM has deferred a large number of acres because they are within the general project area of the Gasco Environmental Impact Statement ("EIS"). We are again nominating these lands.⁸ The Record of Decision ("ROD") for the Gasco EIS was signed on June 18, 2012. However, over one year later, Southern Utah Wilderness Alliance ("SUWA") filed a complaint challenging several Gasco-proposed projects, including the EIS and ROD as well as several site-specific Environmental Analyses. *See Southern Utah Wilderness Alliance v. Department of Interior, et al.*, Case No. 13-cv-1060 (filed November 27, 2013). In July 2015, the United States District Court for the District of Utah issued a decision dismissing all of SUWA's claims relating to the EIS and ROD for lack of standing and failure to state a claim. *See* Docket Entry No. 71 ("The Court finds the EIS and the EA do not qualify as "final agency actions" under the APA. Further, the Court finds the ROD does not cause "concrete" or "real and immediate" injuries-in-fact. . . . For these reasons, the Court dismisses SUWA's claims against the EA, the EIS, the ROD, and the Six-Well EA and DR/FONSI but not SUWA's claims

⁷ Certain lands located in T. 11 S., R. 13 E., T. 11 S., R. 14 E., T. 11 S., R. 18 E. and T. 11 S., R. 19 E., SLM.

⁸ Certain lands located in T. 11 S., R. 18 E., T. 11 S., R. 17 E., T. 11 S., R. 16 E., T. 11 S., R. 15 E., T. 10 S., R. 18 E., T. 10 S., R. 17 E., T. 10 S., R. 16 E., T. 10 S., R. 15 E. and T. 10 S., R. 14 E., SLM.

against the Sixteen-Well DR/FONSI.”). Because the litigation concerning the EIS and ROD has now been fully resolved by the District Court, BLM should move forward with leasing all available parcels within the Gasco EIS area.

Conclusion

We ask that BLM please include all of the lands identified on the enclosed spreadsheet in the NCLS for the November 2016 Green River District oil and gas lease sale and accompanying NEPA analysis. If you have any question, please do not hesitate to contact me.

Sincerely,

/s Nora Pincus

Cc: Jenna Whitlock; Kent Hoffman

Enclosures

**Enclosure to Welborn Sullivan Meck & Tooley Expression of Interest for
November 2016 Green River District Office Oil and Gas Lease Sale**

LEGALS	APPROX. ACRES	FEE SURFACE OWNER	Address
The following are unleased lands within the USM;			
<u>T. 6 S., R. 4 W., Duchesne County, USM, UT</u>	-		
Sec. 27: All;	640		
Sec. 28: All;	640		
Sec. 29: All;	640		
Sec. 30: All;	640		
Sec. 31: All;	640		
Sec. 32: All;	640		
Sec. 33: All;	640		
Sec. 34: All;	640		
 <u>T. 6 S., R. 5 W., Duchesne County, USM, UT</u>	 -		
Sec. 19: All;	640		
Sec. 20: All;	640		
Sec. 29: All;	640		
Sec. 30: All;	640		
Sec. 31: All;	640		
Sec. 32: All;	640		
Sec. 33: All;	640		
Sec. 34: All;	640		
Sec. 35: All;	640		
Sec. 36: All;	640		
The following are unleased lands within the SLM;			
<u>T. 6 S., R. 20 E., Uintah County, SLM, UT</u>	-		
Sec. 30: Lots 1-4, E½W½;	320		
Sec. 31: All;	640		
Sec. 33: NW, N2NE, SWNE, NWSE	320		
Sec. 33: SW, S2SE, NESE, SENE	320		
Sec. 34: N2, SE	480		
Sec. 34: SW	160		
Sec. 35: All;	640		

T. 6 S., R. 21 E., Uintah County, SLM, UT

Sec. 3: All;	-	
Sec. 6: All;	640	
Sec. 7: All;	640	
Sec. 10: All;	640	
Sec. 11: All;	640	
Sec. 12: Lots 1, 2, 7, 8, S½;	480	
Sec. 14: Lots 7, 8	280	
Sec. 14: NENW, W½W½;	280	
Sec. 15: All;	640	

T. 8 S., R. 22 E. Uintah County, SLM, UT

Sec. 6: Lots 1-5, S½NE¼, SE¼NW¼;	-	
	320	

T. 8 S., R. 23 E. Uintah County, SLM, UT

Sec. 26: NE¼NE¼;	-	
	40	

T. 8 S., R. 24 E. Uintah County, SLM, UT

Sec. 1: Lots 1, 2, S½NE¼, SE¼;	-	
Sec. 13: S½SE¼;	320	
Sec. 15: N½SW¼, SE¼SW¼, SE¼;	80	
Sec. 23: SE¼NE¼, SW¼SE¼;	280	
Sec. 24: E½;	80	
Sec. 25: E½;	320	
	320	

T. 9 S., R. 17 E. Duchesne and Uintah Counties, SLM, UT

Sec. 35: All;	-	
	640	

T. 9 S., R. 18 E. Uintah County, SLM, UT

Sec. 33: S½;	-	
	320	

T. 9 S., R. 19 E. Uintah County, SLM, UT

Sec. 1: Lots 5, 6, 7;	-	
	120	

Sec. 11: Lot 5:	40	
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Sec. 13: Lot 5,	40	
Sec. 13: E½NE¼, SW¼NE¼, E½SW¼, SE¼;	360	

Sec. 14: Lots 1-3, NW¼, N½SW¼;	360	
Sec. 15: All;	640	

T. 10 S., R. 13 E. Duchesne County, SLM, UT

Sec. 31: Lot 1;	40	
Sec. 33: Lots 1-4, S½SW¼;	240	
Sec. 34: Lot 1;	40	

T. 10 S., R. 14 E. Duchesne County, SLM, UT

Sec. 24: SE¼;	160	
Sec. 25: All;	640	

T. 10 S., R. 15 E. Duchesne County, SLM, UT

Sec. 1: All;	640	
Sec. 3: Lots 1-4, S½NW¼,SW¼;	400	
Sec. 4: All;	640	
Sec. 9: All;	640	
Sec. 10: W½;	320	
Sec. 11: N½;	320	
Sec. 15: W½;	320	
Sec. 17: All;	640	
Sec. 19: Lots 2-6,S½NE¼,SE¼NW¼, E½SW¼, SE¼;	520	
Sec. 20: All;	640	
Sec. 22: NE¼, W½NW¼;	240	

T. 10 S., R. 15 E. Duchesne County, SLM, UT Cont:

Sec. 23: W½E½, NW¼;	320	
Sec. 28: SE¼NE¼, NW¼, NE¼SE¼;	240	
Sec. 29: All;	640	
Sec. 30: All;	640	
Sec. 31: Lot 7,NE¼SE¼;	80	
Sec. 33: Lots 1-4;	160	
Sec. 34: Lots 1-4,NW¼NE¼, SE¼NW¼;	240	
Sec. 35: All;	640	

T. 10 S., R. 16 E. Duchesne County, SLM, UT

Sec. 1: All;	640	
Sec. 10: SE¼NE¼, E½SW¼, SE¼;	280	
Secs. 11 to 15: All;	640	
Sec. 23: E½E½;	160	

Sec. 25: E½, NW¼, N½SW¼, SE¼SW¼;	600
Sec. 27: N½;	320
Sec. 28: N½;	320
Sec. 35: SE¼NE¼, SE¼SE¼;	80

T. 10 S., R. 17 E. Duchesne and Uintah Counties, SLM, UT

Sec. 30: Lot 4;	40
Sec. 31: Lots 1-4, E½W½;	320

T. 10 S., R. 18 E. Uintah County, SLM, UT

Sec. 13: Lot 4;	40
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T. 11 S., R. 13 E. Duchesne County, SLM, UT

Sec. 1: Lots 1,2;	80
Sec. 3: All;	640
Sec. 4: All;	640
Sec. 5: All;	640
Sec. 11: E½, NE¼NW¼;	360
Sec. 12: All;	640
Sec. 19: Lots 2-4, E½, E½W½;	600
Sec. 34: SW¼SW¼;	40
Sec. 35: S½;	320

T. 11 S., R. 14 E., Duchesne County, SLM, UT

Sec. 8: All;	640
Sec. 11: S½;	320
Sec. 12: SW¼;	160
Sec. 14: E½;	320
Sec. 25: W½NW¼, SE¼NW¼, SW¼;	280
Sec. 26: E½SW¼, SW¼SE¼;	120
Sec. 27: E½W½, SW¼SW¼;	200
Sec. 28: E½SW¼;	80
Sec. 30: Lots 3, 4, 7, 8, 9, 12;	240
Sec. 31: Lot 6, NE¼NE¼, NE¼SE¼;	120
Sec. 33: NW¼, N½SW¼, SE¼SW¼, E½SE¼;	360
Sec. 34: NE¼, E½NW¼, N½S½;	400
Sec. 35: Lots 1-4, N½N½, NE¼SW¼, N½SE¼;	440

T. 11 S., R. 15 E., Duchesne County, SLM, UT

Sec. 1: All;	640
Sec. 3: S½N½, S½;	480

Sec. 4: All;	640
Sec. 9: SE¼SE¼;	40
Sec. 11: E½, SW¼;	480
Sec. 12: All;	640
Sec. 13: E½;	320
Sec. 28: E½SE¼, SW¼SE¼;	
Sec. 31: Lot 4;	40
Sec. 33: Lots 1, 2, 3, SE¼NE¼, NW¼, N½SE¼	

T. 11 S., R. 16 E., Duchesne County, SLM, UT

	-
Sec. 1: All;	640
Sec. 6: Lots 1-7, S½NE¼, SE¼NW¼;	400
Sec. 7: All;	640
Sec. 11: S½;	40
Sec. 12: W½;	320
Sec. 13: N½N½, SE¼;	480
Sec. 14: N½;	320
Sec. 15: N½;	320
Sec. 25: All;	640
Sec. 26: All;	640
Sec. 33: All;	640
Sec. 34: All;	640
Sec. 35: All;	640

T. 11 S., R. 17E., Duchesne Counties, SLM, UT

	-
Sec. 10: E½;	320
Sec. 19: Lots 2-4, S½NE¼, SE¼NW¼, E½SW¼, SE¼;	480
Sec. 20: All;	640
Sec. 21: SW¼NW¼, S½;	360
Sec. 23: S½S½;	160
Sec. 26: All;	640
Sec. 27: All;	640
Sec. 28: S½;	320
Sec. 29: S½;	320
Sec. 30: Lots 3, 4, E½SW¼, SE¼;	320
Sec. 31: Lots 1, 2, 4, NE¼, E½NW¼, SE¼SW¼, E½SE¼, SW¼SE¼;	520
Secs. 33 to 35: All;	640

T. 11 S., R. 17E., Uintah Counties, SLM, UT Cont:

	-
Sec. 24: S½S½;	160
Sec. 25: All;	640

T. 11 S., R. 18E., Uintah County, SLM, UT

Sec. 6: Lot 2, 3, 4, SW¼NE¼, S½NW¼, SW¼, NW¼SE¼;	-
Sec. 7: NW¼, NW¼SW¼;	440
Sec. 17: N½NE¼, SE¼NE¼, NW¼;	200
Sec. 18: N½NE¼, SW¼NE¼, NW¼, N½SW¼, NW¼SE¼;	280
Sec. 19: N½SW¼, N½SW¼SW¼, SE¼SW¼, S½SE¼;	400
Sec. 20: S½S½;	280
Sec. 25: SE¼SW¼, S½SE¼;	160
Sec. 26: Tract A;	120
Sec. 27: Lots 1-4, S½N½, S½;	-
Sec. 28: S½NE¼, NW¼NW¼, SE¼;	640
Sec. 29: W½;	280
Sec. 30: All;	320
Sec. 31: All;	640
Sec. 33: NE¼, SW¼, NW¼SE¼;	640
Sec. 34: N½NE¼, SW¼NE¼, NW¼, N½SW¼, SW¼SW¼;	360
Sec. 35: Tract A, Bed of Green River	400
Sec. 36: All;	-
	640

T. 11 S., R. 19 E., Uintah County, SLM, UT

Sec. 6: Lots 3-7, SE¼NW¼, E½SW¼;	-
Sec. 7: Lots 1-4, E½W½;	320
Sec. 18: Lot 1;	320
Sec. 28: SW¼SW¼;	320
Sec. 33: W½NW¼, NW¼SW¼;	40
	120

T. 11 S., R. 20 E., Uintah County, SLM, UT

Sec. 11: NE¼NE¼;	-
	40

T. 7 S., R. 20 E., Uintah County, SLM, UT

SEC 06: S2SE	80	See below for owner information
SEC 07: N2NE	80	See below for owner information
SEC 14: NWSW	40	See below for owner information
SEC 15: W2, N2SE, SWSE	440	See below for owner information
SEC 20: S2, SWNE (PELICAN LAKE)	360	See below for owner information

SEC 21: S2NE, NESE, SW, W2SE, SESE

400

SMA=U.S. Bureau of
Reclamation

See below for owner
information

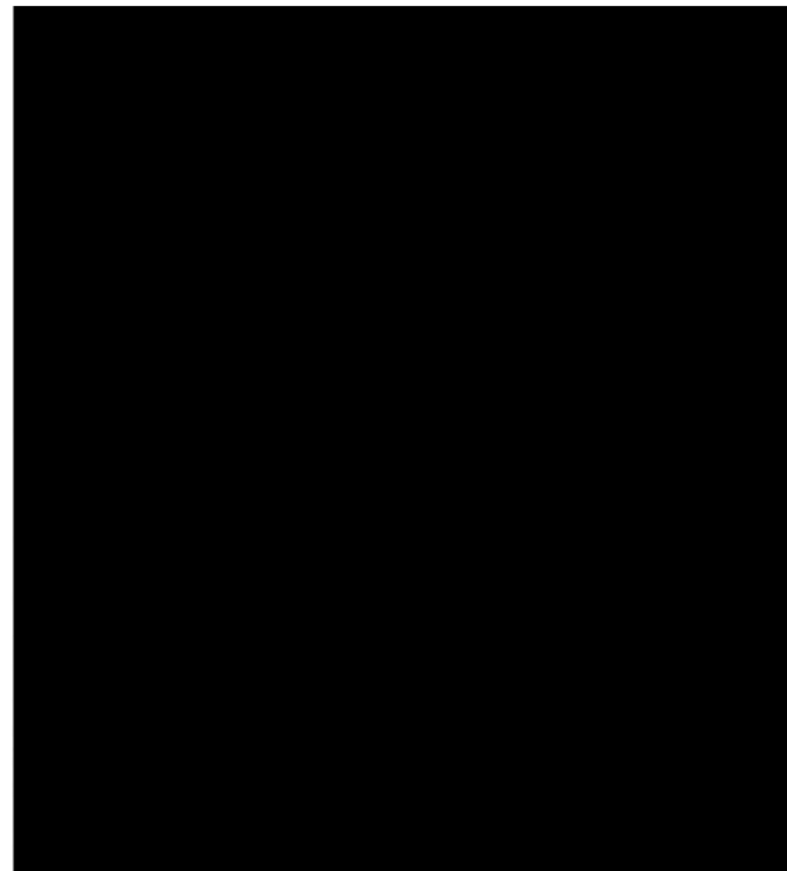
SMA=U.S. Bureau of
Reclamation

SEC 22: W2NW

80

SEC 23: E2, NW, NESW

480

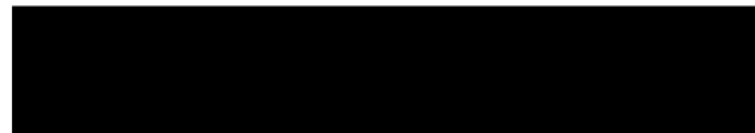


SEC 26: NW

160

SEC 27: N2

320



SEC 28: N2, SW

440

SEC 29: N2, N2SE, SESE, NESW

480

SMA=U.S. Bureau of
Reclamation

Ownership Information for
Sections 6, 7, 14, 15, 20, 21, 22,
T 7S, R 20E , Uintah County,
SLM, UT



TOTAL EOI ACRES

70,160.00