

Southwest Resource Advisory Council Oil and Gas Sub-group Minutes

February 11, (Evening Session) 2016 @ Mancos, CO

Welcome and Introductions-John Reams, SW RAC Chairperson, opened the session at 6:10 p.m.

Southwest Colorado RAC oil and gas subgroup members present: Ernie Williams (SW RAC member), Eric Sanford (SW RAC member), John Reams (SW RAC Chairperson), James Dietrich (SW RAC member), Pete Eschallier (Kokopelli Bike and Board), Christi Zeller (La Plata Energy Council), Jimbo Buickerood (San Juan Citizens Alliance), Dale Davidson (Southwest Canyons Alliance), George San Miguel (Mesa Verde National Park), Matt Thorpe (Colorado Parks and Wildlife), Rod Oliver (landowner), James Lambert (Montezuma County Commission), Gregg Dubit (user group), Dan Huntington (landowner).

BLM staff: Connie Clementson (Tres Rios Field Office Manager), Justin Abernathy (Tres Rios Assistant Field Manager), Ryan Joyner (BLM physical scientist), Barb Sharrow (Acting Southwest District Manager), Matt Azhocar (Southwest Associate District Manager).

Barb Sharrow – gave brief overview and clarification of the Southwest Resource Advisory Council, the RAC Sub-group, and public process. The RAC consists of 15 members, appointed by the Secretary of the Interior, these members have applied, been vetted through multiple levels to include Washington D.C. and consist of 3 categories – Category 1, commercial uses, i.e. livestock and grazing – Category 2, environmental organizations such as dispersed recreation, tribal entities, wild horse and burro interests and Category 3, elected officials, public-at-large and the state and local government, such as Colorado Parks and Wildlife. During previous RAC meetings, it was decided to utilize the existing Oil and Gas Sub-group of the RAC to explore the need for a Southwest BLM Master Leasing Plan.

The RAC Sub-group, consisting of three RAC members, wrote a letter to the counties to request help finding people in their respective communities to serve on a community based work group. They were asked to assign folks, those in the committee here, and charge them with determining the facts and information needed for making a recommendation to the RAC within this area of interest. We have been asked today to talk about what's in the RMP, so that the group can begin to determine what the issues are – the RMP describes a certain level of coverage on the issues, but may not include everything needed to make that recommendation – this group can explore that, this group is in charge of that – the group can determine what information is needed to make that recommendation, and when as far as meetings or amount of meetings etc. A recommendation from the RAC oil and gas sub-group, then goes to the full RAC – 15 described earlier, remember the larger RAC is also a diverse group – they will need to reach a quorum and vote on whether there is a resolution from the RAC to move forward with recommending an MLP or not to BLM. There is a lot of confidence in the RAC that they represent this group and your community – I thank you –

Barbara Sharrow – introduces the BLM staffers.

John Reams –Asks Ryan Joyner to begin the [PowerPoint presentation](#).

John Reams – opened the floor to questions.

Jim B. please explain the maps on the wall –Ryan Joyner gave an overview of the maps of the area of interest boundary. To download maps, go to http://www.blm.gov/co/st/en/BLM_Information/nepa/TRFO_NEPA/TRFOMLP.html.

John Reams – request – Justin Abernathy please explain the 3,000 wells we keep seeing and hearing about –

Justin Abernathy – In 2006, the BLM prepared a [reasonably foreseeable development scenario](#) (RFD) as part of the land use planning process for the current [Tres Rios Field Office Resource Management Plan](#). That 2006 RFD predicted that over the next 20 years approximately 1,200 conventional oil and gas wells would be drilled in the planning area. It was noted that the planning area for the RFD encompasses approximately 3.5 million acres of BLM, Forest Service, private and state lands that stretch from Archuleta County in the east over the Utah border. Also noted that the area of interest encompasses only a portion of the planning area for the RFD – maybe around 25% or so. In 2008 or 2009, the BLM decided that it needed to amend the 2006 RFD in order to address exploration and development that was occurring at that time on the Gothic Shale Gas Play. So the BLM went back and prepared a supplement to the [2006 RFD](#) which it issued in 2009. That [2009 RFD](#) confirmed the 2006 RFD’s prediction of approximately 1,200 conventional oil and gas wells over a 15 year period, and in addition to the conventional wells it also predicted that approximately 1,800 Gothic Shale wells would be drilled over the 15 year period. So, when you add the 1,200 conventional oil and gas wells predicted to the 1,800 Gothic Shale gas wells predicted, that’s where the 3,000 wells you’ve been hearing about is coming from.

Ryan Joyner - forecasting is a benchmark for analysis – need a benchmark to start analysis and so these numbers come from various conservative projections -- not something asked for, it is number we use to start the analysis.

Ernie Williams – please explain maps more – you said, (Ryan Joyner), what we’re seeing is the total fed mineral estate – 31,100 acres are fed/fed; 15,100 are split estate – so the acres we’re looking at is what?

Ryan Joyner - The BLM applies stipulations to federal surface lands and for split-estate lands where there are federal minerals but the surface is private or state lands or any kind of non-federal land, the BLM talks to the landowner about the stipulations that could be applied to the non-federal surface lands and it applies the stipulations if landowner wants it. So of the around 46,000 acres of federal mineral estate in the area of interest, about 15,000 acres are split-estate where the surface is non-federal land and (on those 15,000 acres of non-federal surface split-estate lands) depending on landowner desires, which is where the on-site visit and earlier process I covered comes into play, the private landowner would have a chance to discuss with the BLM and the oil and gas company proposing the development what their options are and what stipulations would be applied before any development occurs.

John Reams – Used the “drinking out of a fire hose” analogy in reference to the community process and the amount of information that the process is trying to cover – He has asked Ryan Joyner to write a narrative of the BLM PowerPoint presentation on the federal oil and gas development process and the RMP information, and also asked Ryan to place that narrative document on the project website. Ryan agreed to do so.

John Reams – points to website address on the wall – please send your written questions and comments in for the subgroup to include –

Oil and Gas Subgroup starts discussion:

Eric Sanford – I would ask all to appreciate the fact we don't do this all the time – these are regular citizens appointed to make sense of this – to give the oil and gas perspective – (points to) the white area on the maps – are not federal minerals or in Parks (CPW, NPS) or in any other control – let's say someone finds oil and gas on those areas, they will likely be developed – assume leases will be developed and drilled – BLM does not control “fee / fee” - private surface and private mineral lands, that said, even if NSO stipulations exist on federal land surrounded by a private parcel, then he (the proponent of the oil and gas development from federal minerals) could go to the private land owner and ask to drill horizontally – that's a scenario that could occur – look at it with this perspective – private minerals surrounding fed are under an entirely different process –

James Dietrich – There are already a lot of wells in Montezuma County following the same scenario Eric Sanford just described – to avoid federal and split estate – development goes to private land first – thinks majority of development will continue to be on the private parcels.

John Reams – we're just gathering info – lets go around the table and talk – I would like to get advice and input from around the table.

Christie Zeller – asks for clarification of the discussion.

Matt Thorpe – are we stuck with the same meeting format – from feedback he heard, the public was agitated at the earlier meeting for not being heard – are we gathering information or are we taking public comment? – How much time should we dedicate to each? – How's this going to work for the next meeting?

Dale Davidson – liked James Dietrich's way and format of previous Montezuma County meeting where he worked through smaller grouping of areas, using [Appendix H](#) as a way to compare areas – heavy on GIS but valuable.

John Reams – however many meetings and ways needed, we can try – this is exactly the input we need.

Gregg Dubit – it would be helpful to have a timeline – articulated for the entire process for which the full considerations which would lead to a MLP needing to be done – people may not have had adequate timeframes and an understanding of the timeline needed and would ask BLM to cover that.

John Reams – we've covered this – we could spend a long time but we want to make the August RAC meeting as a goal – at that time, we would like to have a resolution and/or make that recommendation to the full RAC Committee.

Eric Sanford – We need to try to get BLM our advice this fall, the MLP could take 5 years.

Jim Buickerood – on process - as he understands it, we need to listen to the public and synthesize that input - then this group will need some time also– we would need more meetings to review and discuss that synthesis – it’s one thing to get verbal comments, but getting correlation of those comments to the areas on the map and thoroughly discussing those points is different – do we have a way to tie the comments with the areas of the map?

John Reams – explains his role as chairman of the SW RAC – doesn’t make that recommendation (the oil and gas sub-group does), he’s just facilitating the meeting.

Eric Sanford – you heard some of that, this morning from the mountain biking groups –if some have comments on other areas then the more specific the better, generating comments against or for provide us very little for which to give the BLM advice on the process.

Christie Zeller — my suggestion is that it was very helpful to have comments following the way Montezuma County held their meeting – my suggestion is that if La Plata County wants to do something similar, they should and in order to respect everyone’s time – the area by area method and using the [Appendix H](#) was helpful to focus comments – the three things she’s interested in is; pipeline safety, conservation easements referring to the letter from Colorado Parks and Wildlife – and so far we have heard nothing from the public that isn’t covered by what she has seen in the available documents. She described listening better with her eyes and needing to read the CPW letter first before being able to comment – in August we need to have a public comment meeting.

Dan Huntington – he came away from the meeting this morning with nothing – public comment was so general – he could not use it – get specific – He wants to know how will the private landowners be impacted by doing this – they need to be included.

Pete Eschallier – interest is in Phil’s World - has not read RMP and Appendices – can someone from BLM explain the stipulations, what already exists in the area of Phil’s World? – if that answer is too detailed for this meeting, then how can someone from the public learn and understand more? – can we come with that information next meeting? –

Ryan Joyner - I can bring that info to the next meeting –

Connie Clementson - would like to know if Montezuma County could sit down with the RAC and go over what they did?

Pete Eschallier – doesn’t hear much talk about recreation tourism, economic stipulations and effects on the local economy – does the RMP address that? Economic benefits are a resource issue that maybe we can talk about – develop smartly.

Eric Sanford – Question maybe, is it covered in the RMP? How would it be addressed by a MLP? – Is there another process that would address that issue? If we could look at every issue and their respective specific resources, we can get answers. There is a lot of information to take in – I’m not the only one that may be able to understand what a MLP can or cannot do.

Greg Dubit – with all this information and synthesis to gather thoughts – what is the deadline people can come and speak or make written comments, what’s the deadline – we need to compile for the full RAC – not totally clear on the timeline for people to have their thoughts as part of the compiling and synthesis in order to have that included.

Connie Clementson – originally we talked about targeting the August RAC meeting for a recommendation to BLM due to member turnover on the RAC –plug for applications to serve on the RAC –we asked John Reams to have the recommendation available during a full quorum – and resolution.

Ernie Williams – I think we need to set a date, end of June, and have time after to review and synthesize comments – time to put data together – then have a July meeting – and meeting in August.

Dale Davidson – Remembers a discussion around the idea that if deficiencies in RMP exist, then the MLP could lead to RMP Amendment? Is that still in play?

Connie Clementson – complicated question – the MLP would likely be an Environmental Assessment, it’s hard to answer because we don’t know what the issues are – a RMP amendment would take longer to complete – I think we can say we are not looking for a RMP Amendment – generally, the issues are covered within a new RMP.

Dale Davidson - referring to the private vs federal minerals; it’s a matter of scale, may not be a way to judge importance/relevance – Where are those lands? – Let’s not just think about it on a one-to-one basis.

John Reams - we have 10 minutes remaining before public comments, we may need to address the format of the next meeting.

Matt Thorp – waives time

Jimbo Buickerood – on process – doesn’t see any need to change the agenda for the next couple meetings – suggest we find time to look into the public comments, don’t need to wait until summer, why don’t we think end of March and then sit down and talk and review, let’s move it along and not leave it hanging. Are we still on for what we’re thinking about the MLP and the audience? – going through the RMP definitions not much for Agriculture and Conservation Easements – these are strong pieces of our tourism economy, our organization will be writing up comments to address these - referring to earlier explanation by BLM, I want to talk private surface, I don’t think it’s fair to say that a private landowner is in the driver seat when talking the on-site meetings and using federal stipulations when looking at private minerals and fed minerals – a private landowner that has no attorney doesn’t compare with the government who does –the reality is industry would rather deal with private landowner than the federal government.

James Lambert - something Connie Clementson said, the MLP would deal specifically with environmental concerns –

Connie Clementson – the MLP would look at the key issues – they may be socioeconomic – that’s what

we're looking at, are there things we didn't address in the RMP, she wants to hear from the community –

James Lambert – public comments so far have little to do with environmental issues and more to do with process – he's a proponent of returning lands to the State – one of the objections is that you can't trust the State but he hears the public don't trust the BLM - somewhere somebody has to be trusted – How are we going to deal with environmental concerns in this process?

Chris Lopez – appreciates the dialogue – some frustration this morning – supportive of Jimbo Buickerood suggestion we speed up, not drag on – described his job title – want to discuss what Eric Sanford said earlier – there are multiple layers of regulation that the oil and gas industry already has to go through – state, federal, local – What is the appropriate level to address these concerns? – wants to know where this level is for addressing protections and having protections in place – was involved in SE Utah MLP – this SW MLP is unique because it doesn't even meet the criteria for completing a MLP – and – in this case State Director discretion is being exercised – on the process – CO has 4 other MLPs underway, and have not even started, this is not a quick fix – What is appropriate? – This is brand new territory for BLM nationally, they take a long time – 2010 Canyonlands decision to do MLPs in UT have not even started, named the Greater Canyonlands MLP – frustration, 6 years later and not started – CO is in the same situation.

Rod Oliver – the working group does not have an accurate cross section of the county – it's not about the meeting and who shows up, there are more people in the community that need to be considered.

James Dietrich – asks the group, what value would the mapping exercise add – We could do - if subgroup thinks there is value – He will do –

Public Comments:

Ellen Foster (see attached comments)

M. B. McAfee (see attached comments)

Betty Ann Kolner (see attached comments)

Katie Koppenhafer (see attached comments)

Bruce Short (see attached comments)

Maddy Butcher (see attached comments)

Dennis Styles – W Ranchers Alliance – pipelines – issues codes and regulations. Talk is cheap – not against the MLP but construction traffic and traffic on dirt roads, dust needs to be addressed – all pipelines from wells need to be buried lines – example, Deadhorse Lateral – 100% x-rayed for integrity – meet standards and codes, all inspections should be CDWI – follow guidelines —see comments given at Durango meeting.

Phillip Walters (see attached comments)

Dennis Beasler – Business owner – Montezuma County – are commissioners going to be on final plan development? – will everyone's issues be made public and is anyone answering their issues and comments or will the board and sub-group take them up the line?

Citizen (A name was not captured for the minutes.) -- Concerned about the amount of water fracking will use – keep our water safe for Agricultural uses and all else – is in support of MLP if there is an option to exempt lands from oil and gas extraction – the area has already leased enough if we burn all that is leased we'll harm planet.

Quinn Swope (see attached comments).

Chad Gilbert (see attached comments)

Jane Anderson (see attached comments)

Richard Fulton – Mancos – maps show Weber and WSAs - last night he took a walk and noticed the beauty of the area, the valley and this valley is made unique by its quietness and beauty – look and listen-

Chris Easton – Cortez – Connie C. mentioned socioeconomic – current RMP stipulations. Resource protections are just a part of MLP – are there other MLPs and Stipulations crafted that this process can borrow and formulate stipulations to address specific concerns – put them before the RAC.

Tyler Hoyt – Farmer – Mancos – already see drilling impacts of oil and gas everyday – already too much – can't imagine more trucks and traffic driving by his house – looked all over for residence and chose Mancos because of the lack of oil and gas – farmers rely on water and irrigation – Animas had negative influence on farmers – we have something special living here because of the lack of those dangers, economies need to be protected – supportive of MLP.

Andrea Hackensack – Green table farm – expressed concern for water quality – farmers and ranchers have clean water and don't want to see the same thing happening like in La Plata County to move to Mancos – continue to make it safe.

Ollie Bye – Mancos – similar concerns for water – MLP and citizens input into the process – just because private lands are out of the process, doesn't mean they are doomed to development– resent that notion – those in the room, thanks for being activists for showing up and thanks for coming out.

John Reams – next move – mapping exercise for the Sub-group similar to what Montezuma County conducted

John Reams – concluded meeting 8:32 p.m.

**Comments submitted during
public comment period on
2-11-16 in Hesperus, CO**

TRES RIOS FIELD OFFICE, MASTER LEASING PLAN, FEBRUARY 11, 2016

Public Comments by Ellen Foster, 25314 County Road T, Dolores, CO 81323

The boundary of the MLP should be expanded to include all the private land north and west of the proposed boundary, extending to the Montezuma County line.

McPhee Reservoir, the Dam and Narraguinnep are not included in the proposed MLP boundary. And the only protection provided for any Reservoir or Lake in the Resource Management Plan is No Surface Occupancy within 0.25 mile of the high water shoreline. (Stipulation 1.7), but this is also subject to waiver, exception and modification as decided by the BLM. More specific criteria are needed. And more consideration of the risks to these water sources is warranted, as shown by the BLM's recent lease deferral near McPhee.

The BLM should consult with the Bureau of Reclamation and the USGS to establish an appropriate buffer zone around McPhee Reservoir and all reservoirs, where drilling, seismic activities and waste water disposal wells are prohibited. There should be absolutely no exceptions, modifications, or waivers allowed on all protective measures for new AND EXISTING leases.

There must be regular monitoring and review to ensure that Special Lease Stipulations and Conditions of Approval are being met. If the BLM does not have adequate staff to monitor and review these requirements, this area should be closed to oil and gas leasing.

Montezuma County has a long tradition of farming and ranching. Consumers are increasingly concerned about where and how crops are raised. Organic farmers are held to especially high standards. Clean air, water and soil are essential for their economic survival. I couldn't find one reference to agriculture in the Resource Management Plan.

There is immense potential for conflict between oil and gas developers and farmers who don't own the minerals below their private property. Increased oil and gas development threatens not only their livelihood, but their property values, their health, and their quality of life.

You may look at the map of split estate owners and think that there isn't that much acreage involved, but even a small parcel is important to the person who farms it. Final approval of exceptions, modifications, and waivers is left to the discretion of the Authorized Officer, whose determination is partially based on whether or not something has a "substantial" effect. But there are no guidelines for what is considered "substantial".

We need an MLP to create specific lease stipulations and conditions of approval, similar to those included in the Moab MLP, that would protect local farmers, ranchers and other surface owners.

For example, the Moab MLP contains this Stipulation:

On split-estate lands within the Planning Area, the operator would comply with the lease stipulations applied to surrounding lands with Federal surface. The Authorized Officer would apply the same lease exceptions, modifications and waivers as those applied to surrounding lands with Federal surface.

In conclusion, I'm asking the Working Group to recommend that a Master Leasing Plan be done, that the Working Group make their recommendation as soon after the March 16 public hearing as possible, and that no leasing take place until the MLP is finalized.

Thank you all for taking the time to be involved in this process.

Public Comment: Tres Rios BLM Working Group Meeting

From: M. B. McAfee
22277 Road 20
Lewis CO 81327
February 11, 2016
mbmcafee@fone.net

I am keenly interested in moving this process along; it's clear to me that there will be a Master Leasing Plan in western LaPlata County and a central swath of Montezuma County. I believe this process can move along more quickly than is outlined. BLM at the state and national levels will ultimately make the decision. The RAC and its subgroups are advisors. I urge this Working Group to come to grips with the fact that the RMP is inadequate on several fronts. An MLP will be derived from local input and is the best tool to protect our communities in terms of water and air quality, our agricultural heritage, and tourism potential.

I will make two points. First, it is not clear to me how the boundary of this map was determined other than Connie Clementson saying on two occasions (Montezuma County Commissioner meeting on Nov. 2, 2015 and during the Working Group meeting on Nov. 19, 2015), "We had to start somewhere." Experts predict the Gothic Shale Oil play will re-emerge when oil prices rise and the technology to deal with the salinity problem is solved. Therefore, it is a matter of common sense that the boundaries of the MLP map should include the area of the Gothic Shale play. I am in favor of an MLP in this larger area so as to give as much local control about oil and gas development in the largest area possible.

Second, I want to address the language of the Tres Rios Field Office Resource Management Plan, particularly in Appendix H and in reference to Exceptions, Modifications and Waivers. I have read in Chapter 2 of the RMP that the fluid mineral program emphasizes the orderly and environmentally responsible development of oil and gas on lands subject to lease disposal. Also, it is stated on page 112 of Chapter 2 that, "All TRFO oil and gas leases are subject to Standard lease terms; these are the least restrictive terms under which an oil and gas lessee **may** operate." I want to emphasize the permissive language here – "**may**" rather than "**must**." Permissive language leaves too much wiggle room for the area to be regulated at the whim of personal discretion rather than regulations rooted in science and common sense. I'd rather pin my future to a sturdy juniper tree or sagebrush, the lasting sentinels of our high desert plateau.

Furthermore, there is a pervasiveness of permissive language regarding Exceptions, Modifications, and Waivers in Appendix H. On page 8 of Appendix H Standard Lease language is explained; it illustrates that these stipulations can be bent, shaped, or ignored. It describes the Standard Lease language wherein the Authorizing Officer **may** grant exceptions to stipulations, **may** modify stipulations or **may** waive stipulations. This renders the long list of stipulations useless by allowing the Authorizing Officer to overcome any objections from the public or private sector regarding potential reasons to block or redesign oil and gas development activities. I believe this permissive language, alone, indicates that the RMP is deficient. For me this slices through most issues like a laser beam and leads simply to the conclusion that an MLP is the necessary for specific protections in an area that incorporates the entire Gothic Shale play.

Hello, my name is Katie Koppenhafer. I live in Cortez and work with the team at Osprey Packs. I enjoy big game hunting and I'm an avid mountain biker.

This evening I am here to speak on behalf of the Southwest Colorado Cycling Association, formerly known as Kokopelli Bike Club. We currently have over 350 local members and have been active in the community for over 15 years.

The bike club has been instrumental in the building, expansion and maintenance of many of the local trail systems such as Boggy Draw, Sage Hen and Phil's World. Most recently we have secured an agreement with the Forest Service to groom trails for snow biking on Boggy Draw.

The bike club would like to express our gratitude for the staff at the BLM and to you, the volunteers, on the working group for donating your time and energy to this important process.

The Southwest Colorado Cycling Association supports the creation of a Southwest Colorado Master Leasing Plan because we believe that an MLP is a way to ensure our important recreation resources are protected. With smart planning we can avoid conflicts with future oil and gas development. Areas like Phil's World are consistently named among the top mountain bike destinations in Colorado. Phil's World is also nationally known and is a huge draw for our region. Recreation resources like these are why many of us choose to live here. Unfortunately the way things stand now, oil and gas development could occur in and around Phil's World. A master leasing plan would need to include protections to ensure that future oil and gas development does not detract from the user experience.

The new trail project "Paths to Mesa Verde" is a proposed trail system to connect Mancos, Mesa Verde NP, and Cortez. Once completed it would be just another draw to our region and enhance our already amazing recreation opportunities. An ambitious project like this would benefit greatly from a Master Leasing Plan. The SWCO MLP would take a broad look at the region and involve local stake-holders to create a plan that makes sense. It would ensure that future development decisions do not harm our recreation resources.

Our recreation resources are indeed, amazing. Which is why the Southwest Colorado Cycling Association supports the creation of a SWCO MLP. Thank you.

February 11, 2016

To: Tres Rios BLM Office Resource Advisory Committee

From: Cedar Mesa Ranches HOA

P.O. Box 62

Mancos, CO 81328

Subject: Concerns on BLM Oil and Gas Leasing in Montezuma County and Support of Master Leasing
Planning Process

This letter regards potential oil and gas leases on public lands administered by the Bureau of Land Management surrounding the Cedar Mesa Ranches subdivision plus current and potential leases on the publicly-owned subsurface mineral estate underlying private lands within the subdivision.

The residents of Cedar Mesa Ranches (CMR) understand the economic and strategic importance of potential hydrocarbon resources in the Gothic Shale Gas Play underlying our area. We all use petroleum and natural gas to heat our homes, provide electricity and run our vehicles and we understand that supplying those energy sources is necessary to the continued health of our local and national economy. We do believe that oil and gas exploration and development can be done in a manner sensitive to the health, financial stability and quality of life of the local residents. To that end, we offer our concerns for potential leasing of development rights on the public lands and publicly held mineral estate in the CMR vicinity.

- 1. Road Use and Maintenance:** The 10.7 miles of roads within CMR are Montezuma County roads but were not constructed to current County standards and are not maintained by the County. Dues paid to the HOA by the CMR residents pay for all maintenance and improvement of the road system. The roads do not access any place but the subdivision itself. Use of the road system for exploration and development of any oil and gas leases would require heavy truck and equipment traffic which the road system was never designed or constructed to handle. Present road surfacing, alignment, sight distances and grades are not conducive to mixed residential and heavy truck traffic and would present additional safety hazards for the subdivision residents. Reconstruction of the roads to accommodate such heavy traffic would cost far more than the residents could afford, and maintenance costs would increase greatly. The ability of the County to require road reconstruction and maintenance to accommodate oil and gas traffic as well as residential use has not been fully effective as shown by problems with Kinder Morgan on County-maintained roads in the northwest part of the County. An additional issue is increased heavy truck traffic using the exits and intersections at the entrance to Mesa Verde National Park.
- 2. Noise:** The subdivision does not experience through traffic and the location directly across from Mesa Verde National Park and seven miles from both Cortez and Mancos means ambient noise levels are low. Exploration and development within or in close proximity to CMR would bring greatly increased noise levels from traffic, drilling operations, extraction (i.e. pump jacks and

compressor facilities) and well maintenance. Many residents bought land here because of that low ambient noise environment.

3. **Visual Impacts:** CMR residents value the excellent views we have of the La Platas, the Mancos Valley, Mesa Verde and Point Lookout, Sleeping Ute and the Montezuma Valley. A patchwork of drill pads, cleared pipeline corridors and service roads is out of character with the landscape and present an industrial character rather than the rural character we currently enjoy. Our night sky is nearly free of light pollution and security lighting for drill rigs, well pads and associated infrastructure would destroy that.
4. **Air Pollution:** Leakage of gasses during drilling and after are of concern. Hydrogen sulfide leaks have occurred during drilling operations in the Four Corners area in the past and we ask that emergency resident notification protocols be put into place prior to any development activity.
5. **Property Values:** Some studies in Northwest and Northeast Colorado, Northern New Mexico, Wyoming, and Southern La Plata County has shown that property values of tracts with well pads are lowered from 2 up to 22% (La Plata County Commissioner's 2002 report). This is due to all the factors listed above. Additional severance tax revenue from the number of wells that could potentially exist within and around CMR would likely not make up for loss of property tax revenue from the residences in CMR. It has been demonstrated in La Plata County (Durango Herald 2/8/16) that once an oil and gas program is planned or being developed in an area that residents may have a difficult time selling or obtaining property insurance.
6. **Big Game Winter Range:** Cedar Mesa Ranches lies in the area designated by the Colorado Division of Wildlife and noted in the Tres Rios RMP as Critical Winter Range for big game, particularly mule deer. Given the concerns about mule deer populations on the western slope over the past several years, maintaining RMP standards and guides on seasonal use of the BLM parcels surrounding the subdivision are important.
7. **Tres Rios Field Office RMP Compliance:** The CMR HOA and concerned residents have examined the RMP and specifically Appendix H to determine what stipulations O&G exploration and development would be required to meet, and what are the stated management objectives for BLM managed lands surrounding the subdivision. The BLM parcels surrounding CMR are the Summit and Chutes and Ladders portions of the Cortez Special Recreation Management Area. Targeted activities are hiking/trail running and equestrian use in the Summit and mountain biking in Chutes and Ladders sections. Other program management actions for the Summit and Chutes and Ladders sections in the RMP include fuels treatments, but no new temporary or permanent road construction for fuel treatments is allowed, or actions that would adversely impact the recreational settings, experiences or outcomes of the targeted activities. It would seem that O&G exploration and development would also need to comply with those management objectives.

- 8. Possible Solutions:** The CMR HOA recommends a $\frac{3}{4}$ mile No Surface Occupancy (NSO) zone around the subdivision. Exploration activities using CMR roads would be subject to road use standards and limitations commensurate with vehicle weights and use frequency, and road use fees would be paid to the HOA. No development traffic would be allowed unless roads to be used were reconstructed to county standards for the planned vehicle weights and use frequencies prior to any O&G development. Drilling on existing and future leases would be required to use directional drilling methods from pads located outside the $\frac{3}{4}$ mile NSO zone.

Respectfully Submitted,

Cedar Mesa Ranches HOA

Mancos, Colorado

In reading the RMP, I noticed that each resource listed for regulation had the disclaimer that the regs could be modified, by waivers, exceptions or modifications. This would easily nullify any stated regulations within the document, and without the public being notified.

The RMP does not address split estates, leaving surface landowners with few enforceable regulations they could utilize to control unwanted production activities on their land. As a surface owner, being pressured to sign a surface use contract, I was told 1) my signature doesn't matter, they have rights to subsurface minerals, signature or not and 2) in the case of multiple ownership, they need 1% of owners to sign—that's only one out of 100! Extraction on private property is not addressed in the RMP.

The RMP neglects to mention agriculture anywhere in the document. Local producers are a major asset to our economy. Without proper setbacks from water sources and growing areas, along w/attention to air quality and soil health, we stand to lose our ability to grow our own food.

The Master Leasing Plan is a chance to challenge the status quo. Industry can be required to monitor, clean up and reclaim their activities through enforceable stipulations. Industry can foot the bill for staff, equipment and the technology it takes to do the job without a toxic footprint. At present, there is no local independent monitoring of Volatile Organic Compounds, discovered to be escaping from the Yellow Jacket Compressor station, via private monitoring approximately one year ago.

As a tool with some "teeth", an MLP could give our community a chance to control how and where we want Industry presence. With it's guarantee of public input, this community can say what we want to look like from now and into the future.

Thanks
Bettyann Kolner

To THE SWRAC Sub-group

Comments For Feb. 11 Mancos Meeting

I Also Read Eric Sanford's comment in today's Journal - & I don't know what restrictions that The "public doesn't understand" are in place & what do you mean by: "So when you talk about things like night sky, you're talking about MLP preventing O&G from being on federal land, wherein the background there might be a dozen rigs on public land."

Philip Walters (Elk Stream Ranch) Comments to MLP session in Mancos, CO Feb 10, 2016

Hi, I am Philip Walters, and I live at 6137 Road 46 in East Canyon about 3 miles south of Mancos Hill. I am also speaking on behalf of the Board of Elk Stream Ranch, one of the communities in East Canyon.

We want to thank BLM Tres Rios staff, and the Working Group members, the representatives from Montezuma County, La Plata County, National Park Service and Colorado Parks and Wildlife and today's participants for your valuable time and participation in this MLP process.

We live in a very special place in SW Colorado, and are blessed with many resources. The mineral wealth of this area belonging to the people of the United States is certainly an important resource, but we have many other resources, public and private that are also valuable, and we support the creation of this MLP as a way to balance the protection of these other resources when further mineral development occurs.

Specifically, those of us with property in East Canyon are living on that land, grazing livestock as well, and we are critically dependent upon a shallow and small aquifer for all of our drinking water as well as for livestock water. This aquifer is a locally recharged riparian aquifer, with no impervious formation above it. Any spill or surface contamination will easily enter the aquifer, and can render it unusable for everyone in the canyon. It is imperative that the MLP protect this water resource we depend upon to live in East Canyon. We ask the MLP classify all of the residential private land in East Canyon as "No Surface Use" (a designation that was in place in past lease offers) and the MLP should provide specific protections for this aquifer to protect it from damage.

East Canyon has a low density of development, and low traffic, which makes it a wildlife corridor for most of the wildlife species of this area, giving access to wildlife from public land to the north side of US 160 to the Menifee Wilderness Study Area to our west, and to BLM and Ute lands to our south. East Canyon serves as a buffer for the east side of the WSA. A "no surface use" designation of East Canyon would protect these wildlife resources.

We would like to submit further written comments to the Working Group and are happy to discuss the specific resource issues in East Canyon further.

Thank You

Philip Walters
PO Box 57
Mancos, CO 81328
(970) 533-7177
pwalters@eastcanserv.com

The current NSO map does not include some areas in East Canyon that are near aquifer recharge zones,



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

uinn Swope

1 message

quinn swope <qswope@yahoo.com>

Fri, Feb 12, 2016 at 8:18 PM

Reply-To: quinn swope <qswope@yahoo.com>

To: "blm_co_trfo_oilandgas@blm.gov" <blm_co_trfo_oilandgas@blm.gov>

To the MLP research committee:

I am a citizen of Dolores and appreciate those of you who have volunteered to read these comments. I am a retired educator and grew up in Cortez. I am in favor of an MLP in the Tres Rios area of La Plata and Montezuma counties. Having spent the past 50 years exploring and enjoying the public lands of the area I have a vested interest in seeing our lands protected.

I would like the committee to be sure to protect the edges of Mesa Verde National Park as well as all other cultural resources. We are known worldwide as a cultural hub for archaeology and the study of early people in North America. We need to be sure to be able to conserve these areas for the future. They are important economically and socially in this county.

Being an avid outdoorsman I would be in favor of minimizing the oil and gas industry's impact on all recreation in the area. Please be sure to protect the Phil's World biking area. I live here in order to enjoy our public lands on a regular basis. My retirement income could be spent elsewhere, but I choose this county because of the recreational opportunities in hiking, biking and fishing. Being over run with roads, and pumping jacks would seriously affect the quality of our air, water and therefore our lives.

I volunteer to do trail work on local hiking and biking trails every year about 5 hours a week during the summer and fall. To see my trails cut with new roads everywhere would be really depressing. Recreation if protected will continue to be a big draw for our area. Economically it makes long term sense to preserve what we have.

Many of my fellow retirees appreciate this area as a peaceful and beautiful spot to live. The environment is important to this group and we have a large economic impact in the county. Please be wise in how you guide our future outdoor experience.

Thank you

Quinn Swope
201 North 19th Street
PO Box 374
Dolores, CO

Hello my name is Chad Gilbert and I represent 7000 oil and gas workers nation wide for members of Pipeliners Union 798. I also live in Cedar Mesa Ranches near proposed development of oil and gas reserves in the Gothic Shale Play.

Although I am pro gas and oil development as a union member and craftsmen, I am also for quality construction and for using a local workforce, when possible, and prevailing wages for development of our local resources.

I urge the committee to pursue the Master Lease Plan and also to insure the socio economics of the project. Contractors should be required to have healthcare for their employees so we, as citizens of Montezuma and La Plata Counties, are not responsible for out of state low wage workers that cannot pay for hospital and clinic visits for their families. We also request these jobs be prevailing wage so the workers will be able to afford good housing and shop in local businesses. This will help build the economy in our communities.

So many times in my career I have seen workers living in poor living conditions and barely making enough money to send home to Texas or Arizona, or where the workers families reside. I have also seen workers who are forced to work for contractors because they fear being turned into authorities for lack of citizenship.

I ask the commission to help workers by addressing our issues of unscrupulous contractors being used to develop our resources in Montezuma and La Plata Counties under the socio economics of a Master Leasing Plan.

Quality should also be looked at so every aspect of the development is safe for our families. Gathering systems should be 100 percent weld X-rayed and only Certified Welding inspectors should be used for construction of the piping and facilities. Pipeline safety needs to be addressed in a MLP . These are issues I see from my 30 years in the field that I know the Counties are not prepared to consider and address.

To finish, I truly believe that all these issues need to be addressed in order for the Gothic Shale Play and the leases we are addressing today to be successful.

Thank you
Chad Gilbert
36013 Rd K.3
Mancos Co. 81328



© 2011
C-851-TU

CHAD GILBERT
Business Agent
Office: 918-270-6736
Cell: 918-606-9458
E-Mail: chad@local798.org

P.O. Box 470798
(4823 S 83rd E Ave)
Tulsa, Oklahoma 74147-0798
Phone: 918-622-1900
Fax: 918-627-9327

Comments related to BLM Oil and Gas Subgroup Meeting

2/11/2016, Mancos Colorado

Good evening. My name is Jane Anderson. After retiring from the National Park in January of 2015 Service I moved to Montezuma County, purchased a home and property. I spent 8 years of my NPS career working at Mesa Verde National Park.

I appreciate the opportunity to make comments to the BLM about the necessity of developing a Master Leasing Plan for potential oil and gas development on 66,422 acres managed by the Tres Rios Field Office.

The BLM as an agency of the Department of the Interior has a responsibility to insure that any lands leased for oil and gas development are protected from harm. In the current leasing allotment there are two areas of national and international importance that must be addressed with adequate protection to insure that those areas do not sustain irreparable damage. Those areas are Mesa Verde National Park and Canyon of the Ancients. The newly released Resource Management Plan does not adequately address lease stipulations for the lands adjacent to these two magnificent areas where conflict will occur. A MLP can address stipulations to protect air quality, water quality, protection of flora and fauna and any endangered or threatened species, viewsheds, soundscapes and night skies – especially important for Mesa Verde and its value to the public. Mesa Verde is a \$50 Million economic engine in this area and the viewsheds from the park are like no other. It will lose significant value if the landscape is marred with drilling rigs, access roads and off gassing of methane. The development of these adjacent lands results in increased truck traffic on dusty roads that lead to health issues and hazy skies. The BLM itself has data that shows increased vandalism to archeological sites as a result of access roads and development of leasing sites. A MLP can address these issues and insure conditions of approval are met and best practices implemented. In the case of Mesa Verde the BLM should be working closely with their sister agency to insure the best protection of the park and adjacent lands.

There are many other areas of concern that should be addressed by a MLP:

1. Wildlife – the impacts include disruption of wildlife corridors, habitat fragmentation due to road development and pipeline infrastructure, threats to rare and endangered species – all items that could be addressed with specific stipulations in a MLP
2. Air Quality – including visibility in the region – increased introduction of hazardous air pollutants such as benzene and n-hexane – known carcinogens
3. Water quality – drilling can affect both surface and below ground water sources. This is a major concern that have devastating results if there are not safeguards in place. While the RMP has some stipulations they are not specific and no particular water resource has been identified.
4. Agriculture is one of the major providers of income in this county. The current RMP does not adequately any conflicts that would arise between oil and gas development and agricultural resources.
5. Recreation, community and quality of life. This area is mostly undisturbed and provides incredible hiking, boating, biking skiing, wildlife observation and peaceful rural living like no other. The potential of destroying these resources without adequate protection would be disastrous. Is it worth short term job inflation and gas production only to destroy these precious resources that we all love? What about the future generations that would be affected?

Thank you

Jane Anderson

11822 Road 28.3

Dolores, CO 81323

andersonmorris@hotmail.com

On a local level there are numerous economic and environmental reasons to stop oil, gas and other extractions on BLM land in Montezuma and La Plata counties—preserving the beauty of the land we love, not adding to the air pollution that already exists in our area, not interfering with recreational and agricultural use of BLM and surrounding land, etc.

But when we jump to a big-picture perspective, there we find the biggest, most crucial, motivator of all—climate change. We—all of us, every living being on this planet, our only planet—are on track for a 4 degree increase in global temperature, double what all models say we need to prevent. Therefore, all of us as global citizens need to consider this necessary prevention in virtually every decision we make.

Thus, BLM as a governmental agency representing many, many global citizens and having great influence over the land use of BLM lands and surrounding areas needs to do its part in keeping carbon in the ground. Please change BLM's focus, policy, and work to the truly sustainable management of the lands BLM stewards—no further extractions and instead support communities and individuals to build solar arrays, wind farms, public transportation, keep water sources clean, preserve open space and beauty, etc., etc.

Think and act in the big-picture reality—you can do it!

Lisa Allee, RN, CNM
14493 Rd 31
Mancos, CO 81328
lisaalleecn@gmail.com
970-570-7936

Specifically—
yes to a MLP, increase the area
the MLP covers, use the
MLP to push BLM to
change course ~~to~~ away
from fossil fuel extraction
& towards 100% renewable
energy

The RMP does not address
climate change & it
is crucial that it does!



**Southwest Resource Advisory Council
Oil and Gas Sub-group
February 11, 2016
Durango, CO ♦ Mancos, CO**

Public Comment Form

Name: STAN MATTINGLY

Address: 35987 ROAD J.9 MANCOS CO 81328

Phone: 970 565 0118

Email: stanbmattingly@hotmail.com

Comments: Does the RMP adequately describe the role and authorities of Colorado Oil and Gas Conservation Commission (COGCC) as it applies to the proposed oil and gas program in southwest Colorado? If it does not, I believe it should because activities on Federal lands and subsurface mineral holdings impact neighboring private lands and vice versa. The public deserves to be informed.

Stan S. Mattingly

Statement to RAC Group for BLM Consideration of a MLP in Tres Rios Field Area - February 11, 2016

The overwhelming weight of my husband's and my decision to move his medical practice as a Family Practitioner and raise our family in this area was the natural beauty and varied outdoor opportunities we could readily enjoy on a daily basis. He gave himself tirelessly to the health and well-being of his patients and saw first hand the devastation and ill effects of some of the issues our community members faced working in such high-risk occupations like mining and the oil and gas extraction industries. An athlete in his own right, non-smoker, early proponent and ardent cyclist from the inception of Phil's World, he, too, would fall victim to metastatic lung cancer.

Our home and property has become a refuge and a place of retreat with small vacation rentals for those who continue to travel from around the globe to this uniquely grand locale which has, no less, a designated WORLD HERITAGE PARK at MESA VERDE NATIONAL PARK. I have personally had potential guests query my drinking water source. They would not take accommodations in the Durango area because of last year's mining tailings spill into the Animas River. As a result of this disastrous event they chose to utilize my lodging which felt less "endangered" to them.

But we are all imminently "endangered" by our short-sided, narrowly focused goals on how to use the resources this area offers, most specifically, hastily and poorly regulated extraction of oil, gas and minerals. This one pointed and dogged pursuit to develop these limited resources has a much larger impact on the economic, social, and emotional health of our communities. Additionally, the threats being imposed on the natural wildlife, agricultural sustainability, and panoramic beauty we all take such pleasure in having just outside our back doors are of significant consideration for the ongoing, future viability of not just our small area of the country, but of this planet. Please consider the long-term ramifications over the short-term lure of oil and gas development and use this proposed MLP as a means to mitigate the draw backs of this "race to ravage" our land, air, water and sense of place...

Sincerely and most urgently noted,

jeanne cain, proprietor of casa cielo retreats (Ph: 970-882-7503)
15975 Rd 30
Dolores, CO 81323



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Comment Letter

1 message

Maddy Butcher <maddybutcherhere@gmail.com>

Mon, Feb 15, 2016 at 10:12 AM

To: blm_co_trfo_oilandgas@blm.gov

Dear Subgroup members:

Thanks very much for your volunteer efforts.

I'm one of the many residents of southwestern Colorado who landed here for the area's unique splendor and outdoor opportunities. As you contemplate recommendations to the BLM, please consider:

Despite whatever revenues might be gained by leasing acreage to oil and gas interests, such leases will have a direct and detrimental impact on the existing economy.

The outdoor recreation industry is a \$34.5 billion business in Colorado. According to a 2014 report by the Colorado Statewide Comprehensive Outdoor Recreation Plan, twenty-five thousand jobs exist here in the southwest region because of outdoor recreation.

The choice to live here has been quantified as a Willingness to Pay (WTP), an economic model developed by researchers at the University of Utah, Weber State University, and Utah State University for the huge, 784-page study looking into whether transferring federal land to the states would make sense for Utah. It's a model that is readily relevant in the Tres Rios MLP discussion.

The researchers calculated significant WTP losses if there were more extraction in previously undeveloped areas. For example, folks pay huge money to hunt trophy elk in pristine wilderness. If industry comes in, stirs up the elk population and wrecks the panoramic photo opportunities, the WTP goes down. Hunters go elsewhere.

Researchers have found that folks move to places like Montezuma and LaPlata counties for the natural amenities of public lands and protected landscapes. Those conditions are directly connected to "local economic well-being, including in particular income levels, income growth, and employment growth."

In other words, people who move here aren't slackers, living out of their cars, camping on BLM land, and cooking up ramen night after night. They're smart, go-getters who contribute significantly to the economy:

"[They] tend to be highly educated and employed in skilled and professional occupations [which] can cause such areas to exhibit enhanced levels of "human capital."

Generations ago, bringing more industry to the area might have made sense. But clearly, the area can move away from an economy reliant on environmentally-damaging industries.

Keep it in the ground and it's a win-win.

Maddy Butcher

Mancos, CO

--

[Writer/Reporter/Author/Outsider](#)

**Comments submitted to
blm_co_trfo_oilandgas@blm.gov**



January 13, 2016

State Director Ruth Welch
BLM Colorado State Office
2850 Youngfield Street
Lakewood, Colorado 80215-7093
rwelch@blm.gov

Connie Clementson
Tres Rios Field Manager
Bureau of Land Management
29211 Hwy. 184
Dolores, Colorado 81323
cclementson@blm.gov

RE: Tres Rios Master Leasing Plan

Dear Colorado State Director Ruth Welch and Tres Rios Field Manager Connie Clementson:

Public Land Solutions (PLS) is a non-profit organization dedicated to providing comprehensive recreation planning and stakeholder coordination to support effective and sustainable public land solutions. We would like to thank you for initiating a master leasing plan (MLP) process for the Tres Rios Field Office. Our organization has been an active participant in the Moab Master Leasing Plan effort, which has provided a strong forum for stakeholder engagement and ensuring that the concerns of businesses that rely on public lands for recreation and tourism have a seat at the table.

We at PLS are looking forward to the opportunity to provide input on a more detailed discussion and, ultimately, a plan that will better manage oil and gas development in southwestern Colorado where we have a strong interest and protecting and enhancing the recreation assets that support a thriving recreation economy. We appreciate the work that the BLM has already put into the Tres Rios Resource Management Plan and hope to now work with the agency to better address our concerns regarding protection of Mesa Verde National Park, mountain biking at Phil's World, climbing at the Hawkins Preserve and other opportunities for backcountry recreation, hunting, wildlife, and cultural resources. Fundamental to these experiences is protecting regional water and air quality, and the quality of life of local residents. Having the chance to contribute to the discussion around a MLP is very important to PLS. We want to see the commitment the BLM has already made to evaluating an MLP move forward and lead to a productive outcome.

As a concerned public interest organization, PLS wants to ensure the state BLM defers leasing for areas in Tres Rios that are being considered while a MLP is being prepared. Please follow the direction set out in BLM Colorado's guidance (Instruction Memorandum No. CO-2014-019, issued April 7, 2014) and apply it to the potential Tres Rios MLP. The ongoing process around the Tres Rios MLP meets the standard set out in BLM's own guidance that: "This policy applies only to those MLP areas that have been approved for analysis by the Colorado State Director." Deferring leasing while so many stakeholders are working to analyze this potential MLP will make sure the BLM's decisions can be most meaningful.

Since the decision on whether or not to pursue a Master Leasing Plan is currently planned for August, we request that the BLM publicly defer leasing until a decision is made, as provided for

in BLM's April 2014 guidance. If BLM continues to lease lands within the potential MLP area before a decision is made, the utility and effectiveness of the potential MLP will be undermined.

Thank you for your consideration. We look forward to working with the Tres Rios Field Office once it begins a Master Leasing Plan effort.

Sincerely,

A handwritten signature in black ink that reads "Jason Keith". The signature is written in a cursive, flowing style.

Jason Keith
Managing Director
Public Land Solutions
478 Millcreek Drive
Moab, UT 84532
www.publiclandsolutions.org

CC: Lonny Bagley, CO Deputy State Director, Energy Lands & Minerals
Barb Sharrow, Field Manager BLM CO Uncompahgre Field Office

February 3, 2016

Via email and U.S. Mail

Ruth Welch, Director (rwelch@blm.gov)
Bureau of Land Management
Colorado State Office
2850 Youngfield Street
Lakewood, CO 80215-7210

Connie Clementson, Field Manager (cclementson@blm.gov)
Tres Rios Field Office
Bureau of Land Management
29211 Hwy. 184
Dolores, CO 81323

Re: Tres Rios Field Office Master Leasing Plan

Dear Director Welch and Field Manager Clementson:

In recent years, Conservation Colorado and a number of our partners in the conservation community have been advocating for the adoption of a Master Leasing Plan (MLP) process in the Tres Rios Field Office (TRFO). Following the revision and eventual adoption of the TRFO Resource Management Plan (RMP), it became apparent that certain deficiencies in the RMP would need to be addressed in subsequent planning processes to ensure the balanced management of resources and uses could occur in a comprehensive manner.

So needless to say, we were very excited and thank BLM for moving forward with a MLP process in La Plata and Montezuma Counties. We feel that MLP's are a great tool that can help avoid and ameliorate resource and user conflicts and concerns around the Mesa Verde National Park region, as well engage the public in a substantive dialogue around future land management.

However, we are concerned that currently BLM has not instituted a moratorium on fluid mineral leasing within the proposed MLP. Previously in other field offices where MLP's were under consideration as part of RMP revisions or amendments (specifically the Dinosaur Trails MLP within the White River Field Office) lands within the proposed MLP boundary were temporarily withdrawn from lease sales in order to not foreclose upon future management opportunities and undermine public confidence within the planning process.

Additionally, we are a bit confused on what the MLP Working Group's role will be in relation to both the public and the Southwest Resource Advisory Council (SWRAC) and the SWRAC Oil and Gas Sub-group. Currently, the Working Group is charged with a mixture of data gathering and

providing recommendations. However, the protocols on how recommendations will be made by the Working Group or the RAC Oil and Gas Sub-group aren't clear. Will only consensus recommendations be forwarded up the chain as has been the norm for all sub-RAC's and working groups for the NWRAC? Or will a simple majority be sufficient? It would be helpful if these questions were addressed prior to the first working group meeting in order to provide clarity to both the public and working group members as well as empower these individuals with a clear road-map on how to achieve a successful outcome. We recommend the NWRAC Sub-group protocols that were developed for the current WRFO TMP Sub-group as a very useful reference document for RAC members, working group members and the public.

Again, we are pleased that BLM has taken a MLP under consideration in southwest Colorado and we believe that fostering a dialogue about the future of our public lands is always a worthwhile endeavor. We hope will consider the recommendations provided in this letter to help further aid the MLP evaluation process by not only producing a robust set of recommendations for the SWRAC to consider, but also to promote the most efficient and comprehensive level of public involvement possible.

We look forward to continue to work with BLM on this and all other planning processes and appreciate your consideration of the issues we have raised.

Sincerely,

Luke Schafer
Western Slope Advocacy Director
Conservation Colorado
529 Yampa Ave.,
Craig, CO 81725
luke@conservationco.org
970-756-5854



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

MLP vs RMP

1 message

betty ann kolner <bettyannkolner@gmail.com>

Tue, Feb 9, 2016 at 11:56 AM

To: blm_co_trfo_oilandgas@blm.gov, cclementson@blm.gov

In reading the RMP, I noticed that each resource listed for regulation had the disclaimer that the regs could be modified, by waivers, exceptions or modifications. This would easily nullify any stated regulations within the document, and without the public being notified.

The RMP does not address split estates, leaving surface landowners with few enforceable regulations they could utilize to control unwanted production activities on their land. As a surface owner, being pressured to sign a surface use contract, I was told 1) my signature doesn't matter; they have rights to subsurface minerals, signature or not and 2) in the case of multiple ownership, they need 1% of owners to sign--that's only one out of 100! Extraction on private property is not addressed in the RMP.

The RMP neglects to mention agriculture anywhere in the document. Local producers are a major asset to our economy. Without proper setbacks from water sources and growing areas, along w/attention to air quality and soil health, we stand to lose our ability to grow our own food.

The Master Leasing Plan is a chance to challenge the status quo. Industry can be required to monitor, clean up and reclaim their activities through enforceable stipulations. Industry can foot the bill for staff, equipment and the technology it takes to do the job without a toxic footprint. At present, there is no local independent monitoring of Volatile Organic Compounds, discovered to be escaping from the Yellow Jacket Compressor station, via private monitoring approximately one year ago.

As a tool with some "teeth", an MLP could give our community a chance to control how and where we want Industry presence. With it's guarantee of public input, this community can say what we want to look like from now and into the future.

Thanks you
Bettyann Kolner



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Fwd: Tres Rio Master Leasing Plan

1 message

Sharrow, Barbara <bsharrow@blm.gov>

Tue, Feb 9, 2016 at 8:44 AM

To: BLM_CO TRFO_OilandGas <blm_co_trfo_oilandgas@blm.gov>

----- Forwarded message -----

From: **Debra Anderson** <debraa@outlook.com>

Date: Tue, Feb 9, 2016 at 7:37 AM

Subject: Tres Rio Master Leasing Plan

To: bsharrow@blm.gov

Greetings,

I encourage leasing BLM land for mineral development. The BLM is empowered by an act of Congress to exploit all manner of methods of producing revenue on the Federal land under its supervision. This includes mineral leasing of all kinds, grazing leases, and collecting fees for allowing hunting, fishing, and other recreational access. To not develop the minerals on this land would be in direct opposition to Congress. The revenues generated from leasing/development benefits everyone on both a local, personal and national level.

Thank you,

Debra

Debra Anderson

1972 S Grant St.

Denver, CO 80210

719-661-7614

debraa@outlook.com

Comments related to BLM Oil and Gas Subgroup Meeting

2/11/2016, Mancos Colorado

Good evening. My name is Jane Anderson. After retiring from the National Park in January of 2015 Service I moved to Montezuma County, purchased a home and property. I spent 8 years of my NPS career working at Mesa Verde National Park.

I appreciate the opportunity to make comments to the BLM about the necessity of developing a Master Leasing Plan for potential oil and gas development on 66,422 acres managed by the Tres Rios Field Office.

The BLM as an agency of the Department of the Interior has a responsibility to insure that any lands leased for oil and gas development are protected from harm. In the current leasing allotment there are two areas of national and international importance that must be addressed with adequate protection to insure that those areas do not sustain irreparable damage. Those areas are Mesa Verde National Park and Canyon of the Ancients. The newly released Resource Management Plan does not adequately address lease stipulations for the lands adjacent to these two magnificent areas where conflict will occur. A MLP can address stipulations to protect air quality, water quality, protection of flora and fauna and any endangered or threatened species, viewsheds, soundscapes and night skies – especially important for Mesa Verde and its value to the public. Mesa Verde is a \$50 Million economic engine in this area and the viewsheds from the park are like no other. It will lose significant value if the landscape is marred with drilling rigs, access roads and off gassing of methane. The development of these adjacent lands results in increased truck traffic on dusty roads that lead to health issues and hazy skies. The BLM itself has data that shows increased vandalism to archeological sites as a result of access roads and development of leasing sites. A MLP can address these issues and insure conditions of approval are met and best practices implemented. In the case of Mesa Verde the BLM should be working closely with their sister agency to insure the best protection of the park and adjacent lands.

There are many other areas of concern that should be addressed by a MLP:

1. Wildlife – the impacts include disruption of wildlife corridors, habitat fragmentation due to road development and pipeline infrastructure, threats to rare and endangered species – all items that could be addressed with specific stipulations in a MLP
2. Air Quality – including visibility in the region – increased introduction of hazardous air pollutants such as benzene and n-hexane – known carcinogens
3. Water quality – drilling can affect both surface and below ground water sources. This is a major concern that have devastating results if there are not safeguards in place. While the RMP has some stipulations they are not specific and no particular water resource has been identified.
4. Agriculture is one of the major providers of income in this county. The current RMP does not adequately any conflicts that would arise between oil and gas development and agricultural resources.
5. Recreation, community and quality of life. This area is mostly undisturbed and provides incredible hiking, boating, biking skiing, wildlife observation and peaceful rural living like no other. The potential of destroying these resources without adequate protection would be disastrous. Is it worth short term job inflation and gas production only to destroy these precious resources that we all love? What about the future generations that would be affected?

Thank you

Jane Anderson

11822 Road 28.3

Dolores, CO 81323

andersonmorris@hotmail.com



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

No drilling in Montezuma County ~

1 message

Katherine Dobson <katdob11@gmail.com>

Tue, Feb 9, 2016 at 4:23 PM

To: blm_co_trfo_oilandgas@blm.gov

Cc: sborders@blm.gov

Dear BLM,

I am writing to strongly oppose the exploration of drilling/ fracking in Montezuma County and in particular, canyon of the ancients and Mesa Verde national park. Our county has precious tourist and nature resources which will be badly affected by drilling, not to mention our quality of life. Make Montezuma County an example of how to say "NO" to oil & gas to preserve our communities value on health and the environment and clean air and water. We will lose so much if the BLM decided to lease to oil&gas interests ~ stand up and say no!!!!!!

Thank you,

Katherine Dobson
12761 Road 41,9
Mancos, Co 81328

February 1, 2016

RECEIVED
FEB 03 2016
DOLORES PUBLIC
LANDS OFFICE

To the Southwest RAC:

I am unable to attend the meetings to provide my comments in person but wanted to say that there are a lot of us out here outside of the environmental groups that wonder what has come of our world? Seems that we live in a world of hypocrites and finger pointing.

So the La Plata county wants the BLM to do another study on ... what? So I saw the BLM's presentation on this master leasing plan. It appears they are being forced into something that the tax payers shouldn't have to pay for. So.. the BLM said that this area is that they're looking at only has around 80,000 acres of the government's minerals. Most of that is private property with the government's below. I believe it was something like only 26,000 acres remained that the BLM actually had total control over.

So where are the COUNTIES in this. They seem to be doing a lot of finger pointing, acting like they have no role or responsibility in this. I don't think so. Our current commissioners seem to not have any concept of reality.

Montezuma is trying to pass rules that they can't implement (hey guys .. can't implement county rules on federal lands).. and La Plata is busy pointing fingers and not taking any responsibility to lead additional rules for private property (isn't that your jurisdiction guys?).

I say. La Plata county should be doing this master leasing plan since most of the land is private property and it is going to be developed way before the federal land. Just look around. Private lands don't have near the red tape to go through to drill and develop.

Signed


Henry Michael Williams

Lewis, Colorado

Dear RAC members,

Please tell the newspapers to cover the whole story. They seem to only allow editorials from the LEFT and environmentalists. Its about time that the rest of folks are represented. These idiots that drive to protest .. where the hell do they think they think their clothes and mountain bikes and tires and heating comes from.. Or are they 'living' in a tent and walking everywhere. I doubt it.

RAC and BLM.. stop letting these people waste our tax payers money. I'd much rather see some more trails at Phils world than BLM do another study. Does these idiots understand that developing on federal lands is the safest and most controlled processes in the country/world?

Stop waste my tax payer money...

Put that in the papers Cortez Journal and Durango Herald.

Let's get a petition started with that as our goal!

James and Haley Robins

(retired and left that damn county)

POB 77821

Seneca, New York

RECEIVED
JAN 09 2016
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LANDS OFFICE



Borders, Shannon <sborders@blm.gov>

Master leading plan

1 message

Joanie Trussel <joaniepatricia@gmail.com>
To: sborders@blm.gov

Wed, Feb 10, 2016 at 9:49 AM

I would like to submit the following opinion regarding gas and oil leasing in monte zuma county:

The arguments against a master leasing plan stand directly in opposition to what a master leasing plan is intended to do. It is about protection of our land which then leads to protection of our existence - the air we breathe and the water we drink. Realistically we are destroying our atmosphere with every well that is drilled. This is not about economics -- this is about how much digging in the ground we can continue to do before we have affected our physical health and the health of our children and the health of our forests, our wildlife and the health of our planet. This issue needs to be addressed and not ignored for the sake of economic security. It's time for us to wake up!

Joanie Trussel

Sent from my iPhone



Borders, Shannon <sborders@blm.gov>

Comments about the proposed Leasing Plan

1 message

DARCY LEVTZOW <darcylevtzow@hotmail.com>

Wed, Feb 10, 2016 at 3:31 PM

To: "sborders@blm.gov" <sborders@blm.gov>

The current Resource Management Plan has many concerning issues for me.

It appears that any issue dealing with the No Occupancy Provisions has a disclaimer that the provisions may be waived, modified, or exempted as written. That seems as if the oil companies and/or the BLM can do whatever they wish with the land with no consideration for the people, animals, vegetation, and crops living on or near these sights.

It appears that farming and ranching do not seem to be a concern. The oil companies and the BLM should consider the livelihood also of the people living off of this land, growing crops and raising animals.

It also appears as if split estate owners are not protected from any conflict. The BLM should consult with people living on the land, farmers and ranchers, and split estate owners and draft more protective stipulations for their livelihood.

I believe having wells and contamination in our beautiful country and near our incredible cultural resources such as Mesa Verde and the Canyon of the Ancients can only diminish our tourism economy. I can only hope protective stipulations can protect our scenery as that's why the people who live here have their families, animals, and land.

I want there to be more protective overall stipulations or to simply close certain areas to leasing.

Why? More reasons?

The biggest reasons for me are water and air contamination.

Seeps and leakage can contaminate and ruin underground water supplies forever. This effects the people living here, their families, pets, livestock, and land. Seeps and leakages can contaminate our drinking water, streams, and reservoirs. Is any stipulation really going to protect everything? Doubtful.

Then, of course, we have the many chemicals we will be sending into our atmosphere. Yes, the air we breathe. Our area already suffers from poor air quality. Allowing all of these wells and areas to be drilled by the gas and oil companies is only going to make things worse.

So, in the many areas of water and air contamination, wildlife protection, cultural resources, recreation, irrigation canals, rivers, reservoirs, farming and ranching, please consider the most protective stipulations or closing any questionable areas to leasing. All of these deficiencies can contribute to the degradation of our communities quality of life. Please manage this precious land by doing the right thing.

Thank you very much for your time and consideration.

Darcy Levtzow

Public Comment: Tres Rios BLM Working Group Meeting

From: M. B. McAfee
22277 Road 20
Lewis CO 81327
February 11, 2016
mbmcafee@fone.net

I am keenly interested in moving this process along; it's clear to me that there will be a Master Leasing Plan in western LaPlata County and a central swath of Montezuma County. I believe this process can move along more quickly than is outlined. BLM at the state and national levels will ultimately make the decision. The RAC and its subgroups are advisors. I urge this Working Group to come to grips with the fact that the RMP is inadequate on several fronts. An MLP will be derived from local input and is the best tool to protect our communities in terms of water and air quality, our agricultural heritage, and tourism potential.

I will make two points. First, it is not clear to me how the boundary of this map was determined other than Connie Clementson saying on two occasions (Montezuma County Commissioner meeting on Nov. 2, 2015 and during the Working Group meeting on Nov. 19, 2015), "We had to start somewhere." Experts predict the Gothic Shale Oil play will re-emerge when oil prices rise and the technology to deal with the salinity problem is solved. Therefore, it is a matter of common sense that the boundaries of the MLP map should include the area of the Gothic Shale play. I am in favor of an MLP in this larger area so as to give as much local control about oil and gas development in the largest area possible.

Second, I want to address the language of the Tres Rios Field Office Resource Management Plan, particularly in Appendix H and in reference to Exceptions, Modifications and Waivers. I have read in Chapter 2 of the RMP that the fluid mineral program emphasizes the orderly and environmentally responsible development of oil and gas on lands subject to lease disposal. Also, it is stated on page 112 of Chapter 2 that, "All TRFO oil and gas leases are subject to Standard lease terms; these are the least restrictive terms under which an oil and gas lessee **may** operate." I want to emphasize the permissive language here – "**may**" rather than "**must**." Permissive language leaves too much wiggle room for the area to be regulated at the whim of personal discretion rather than regulations rooted in science and common sense. I'd rather pin my future to a sturdy juniper tree or sagebrush, the lasting sentinels of our high dessert plateau.

Furthermore, there is a pervasiveness of permissive language regarding Exceptions, Modifications, and Waivers in Appendix H. On page 8 of Appendix H Standard Lease language is explained; it illustrates that these stipulations can be bent, shaped, or ignored. It describes the Standard Lease language wherein the Authorizing Officer **may** grant exceptions to stipulations, **may** modify stipulations or **may** waive stipulations. This renders the long list of stipulations useless by allowing the Authorizing Officer to overcome any objections from the public or private sector regarding potential reasons to block or redesign oil and gas development activities. I believe this permissive language, alone, indicates that the RMP is deficient. For me this slices through most issues like a laser beam and leads simply to the conclusion that an MLP is the necessary for specific protections in an area that incorporates the entire Gothic Shale play.



COLORADO

Parks and Wildlife

Department of Natural Resources

Southwest Region Office
415 Turner Drive
Durango, CO 81303
P 970.375.6702 | F 970.375.6705

Ms. Shannon Borders
Public Affairs Specialist
Bureau of Land Management
2465 S. Townsend Ave
Montrose, CO 81401
blm_co_trfo_oilandgas@blm.gov

10 February 2016

RE: Oil and Gas Leasing and Master Leasing Plan (MLP) Evaluation for Tres Rios Area of Interest in Montezuma and La Plata Counties, Colorado

Dear Ms. Borders:

Colorado Parks and Wildlife (CPW) has reviewed the Bureau of Land Management (BLM) Tres Rios Master Leasing Plan (MLP) Area of Interest in Montezuma and La Plata counties, Colorado. CPW's mission is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. Montezuma and La Plata counties receive combined economic benefits of approximately \$64.1 million annually from hunting and fishing activities that support an estimated 700 jobs (BBC Research and Consulting 2008). Hunting, fishing and wildlife viewing diversify and enhance the economy of these rural counties. These economic benefits are a sustainable annual source of economic benefit for these counties only if wildlife populations are maintained and quality hunting and fishing opportunities continue to exist.

CPW has a long history of working cooperatively with BLM to evaluate nominated lease parcels for potential conflicts with wildlife and park resources. On December 17, 2012, CPW submitted to BLM's State Office a protest letter requesting deferral of many parcels nominated for the February 2013 Quarterly Lease Sale that are within the current MLP Area of Interest in Montezuma and La Plata counties (see Exhibit 1).

CPW's recommendation to defer these parcels at that time (under the previous Resource Management Plan) was based primarily on the inadequacy of existing lease stipulations to adequately protect wildlife resources. BLM remedied many of our concerns with the RMP update completed in 2015. There are, however, a number of issues raised in our previous lease sale comments that have not been addressed in the updated RMP. Several of these issues are identified in BLM IM 2010-17 and BLM Manual H-1624-1 as potential MLP decisions:

- 1) **Surface facility density limits or caps on surface disturbance** - There is a growing body of evidence that Timing Limitation Stipulations on oil and gas development activities are not adequate to protect crucial winter habitats and migratory corridors for big game, and that limits on the density of surface facilities may be necessary to maintain big game populations (Sawyer et al. 2006, 2009, Sawyer and Neilsen 2010, Northrup et al. 2015);

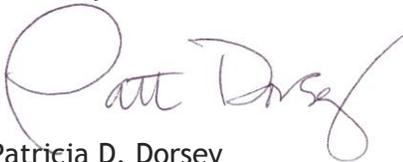


- 2) **Implementation of site-specific best management practices (BMPs)** - In this case, BMPs that promote the use of existing infrastructure to limit additional surface disturbance, such as the use of combined utility corridors, multiple well pads and liquids gathering systems could be appropriate. Phased development that focuses the most intense development activities in specific geographic areas may also reduce widespread impacts to wildlife;
- 3) **Implementation of site-specific lease stipulations to protect land conservation values** - A number of split estate fee surface/federal mineral properties in this area have conservation easements purchased by CPW and others to protect the surface estate for wildlife habitat and wildlife-related recreational values (see Exhibit 1). These values are potential jeopardized by unrestricted mineral development (in terms of facility placement and density). BLM could use the MLP process to develop an additional stipulation for these properties to allow mineral extraction with minimal impacts to the conservation values that they contain;
- 4) **Implementation of mitigation to address residual adverse wildlife impacts from mineral development** - Where mineral development requires surface facility densities exceeding one well pad/mile² in big game crucial winter ranges and migration corridors, CPW recommends requiring compensatory mitigation to offset the impacts to big game populations. In this context, compensatory mitigation to offset impacts to big game from development should focus on replacing the impacted habitat (through conservation of similar habitats) or improving adjacent habitats to the extent necessary to maintain existing big game populations in the lease area. BLM could use the MLP process to promote mineral extraction while offsetting residual adverse impacts to wildlife and wildlife habitat;
- 5) **Defining site-specific lease exception, waiver, and modification criteria**- The Final San Juan National Forest and Bureau of Land Management (BLM) Tres Rios Field Office (TRFO) Land and Resource Management Plan (RMP) and Environmental Impact Statement does not include explicit criteria outlining when and how exceptions, modifications, and waivers may be granted on BLM lands. This makes it difficult to evaluate the effectiveness of these stipulations for protecting wildlife resources during development on. BLM could use the MLP process clarify lease stipulation exception, waiver, and modification criteria to avoid confusing oil and gas operators, resource agencies, and the public.

Conclusion

CPW appreciates BLM's solicitation of public input for its evaluation of a MLP for the Area of Interest identified in Montezuma and La Plata counties, Colorado. CPW values this opportunity to provide BLM with the best available information regarding protection of wildlife resources during oil and gas development. If you have any questions, please contact Jon Holst, SW Region Energy Liaison, at (970) 759-9588.

Sincerely,



Patricia D. Dorsey
SW Region Manager

xc: CPW - M. Thorpe, Area 15 Wildlife Manager; Brian Magee, SW Region Land Use Coordinator; Scott Wait, SW Region Senior Terrestrial Biologist; John Alves, SW Region Senior Aquatic Biologist

Literature Cited

BBC Research & Consulting. 2008. The economic impacts of hunting, fishing and wildlife watching in Colorado (Final Report). 24 pp.

Northrup, J., Anderson, C.R., and G. Wittemyer. 2015. Quantifying spatial habitat loss from hydrocarbon development through assessing habitat selection patterns of mule deer. *Global Change Biology*, John Wiley & Sons Ltd, doi: 10.1111/gcb.13037

Sawyer, H. and R. Neilsen. 2010. Mule deer monitoring in the Pinedale Anticline Project Area. Pinedale Anticline Planning Office (PAPO), Pinedale, WY. 19 pp.

Sawyer, H., Kauffman M.J., and R.M. Nielson. 2009. Influence of well pad activity on winter habitat selection patterns of mule deer. *Journal of Wildlife Management* 73:1052-1061.

Sawyer, H., Nielson, R., Lindzey, F., and L. McDonald. 2006. Winter habitat selection of mule deer before and during development of a natural gas field. *Journal of Wildlife Management* 70(2), 396-403. 2006



COLORADO PARKS & WILDLIFE

1313 Sherman Street, Room 618 • Denver, Colorado 80203
 Phone (303) 866-3437 • FAX (303) 866-3206
 wildlife.state.co.us • parks.state.co.us

December 17, 2012

Helen Hankins, State Director
 BLM Colorado State Office
 2850 Youngfield Street
 Lakewood, CO 80215
 FAX: (303) 239-3799

RE: February 2013 Quarterly Lease Sale

Dear Ms. Hankins:

Helen

Colorado Parks and Wildlife (CPW) has reviewed the Bureau of Land Management (BLM) Notice of Competitive Lease Sale for the February 2013 quarterly lease sale, and the Environmental Assessments (EAs) completed by the BLM Field Offices involved in this sale. CPW has provided input on the parcels nominated for lease through correspondence with the appropriate BLM Field Offices statewide. CPW appreciates the opportunity to coordinate with BLM Field Office staff early in the review process for upcoming lease sales in order to provide the best available information regarding the protection of wildlife resources during oil and gas development.

Background

In 2010, BLM's State Office hosted a series of meetings between our agencies to coordinate a more consistent approach regarding management of wildlife resources during oil and gas development. Integral to those discussions was the desire to incorporate up-to-date wildlife protections in quarterly lease sales and Resource Management Plan (RMP) revisions. At your request, CPW provided BLM's State Office recommendations for oil and gas lease stipulations relevant to RMP revisions and quarterly lease sales in Colorado (see **Attachment 1 - "Lease Recommendations"**).

We derived an understanding from BLM during those meetings that it is extremely difficult to modify the terms of an oil and gas lease once it is issued. Our understanding in 2010 was that BLM intended to use CPW's Lease Recommendations for conducting Plan Maintenance to update lease stipulations in existing RMPs, for possible inclusion in a Statewide RMP amendment for oil and gas, and/or for incorporating updated lease stipulations into RMP revisions – with a goal of including up-to-date stipulations on newly issued leases.

STATE OF COLORADO

John W. Hickenlooper, Governor • Mike King, Executive Director, Department of Natural Resources
 Rick D. Cables, Director, Colorado Parks and Wildlife
 Parks and Wildlife Commission: Robert W. Bray • Chris Castilian • Jeanne Home
 Bill Kane, Vice-Chair • Gaspar Perricone • James Pribyl • John Singletary, Chair
 Mark Smith, Secretary • James Vigil • Dean Wingfield • Michelle Zimmerman
 Ex Officio Members: Mike King and John Salazar

Since 2010, CPW has continued to coordinate with BLM's Field Office staff on quarterly lease sales. CPW generally reviews quarterly sale proposals for wildlife concerns, and where existing stipulations are inadequate to conserve the wildlife resource and/or do not reflect the best available information, CPW recommends that BLM incorporate the stipulations contained in our Lease Recommendations or defer the parcels until such time that appropriate wildlife protections can be attached to the affected leases.

In some cases, BLM Field Offices have deferred specific parcels associated with particularly problematic issues (such as sage grouse) until further analysis can be completed or until an out-of-date RMP is updated with the best available information. We appreciate BLM's responsiveness in those instances, and urge the BLM to take more comprehensive steps to address our Lease Recommendations Statewide in quarterly lease sales and RMP revisions.

February 2013 Lease Sale

On several occasions in the past, CPW has communicated our concerns associated with the February 2013 lease sale with the appropriate BLM Field Offices. For parcels located in Gunnison and Delta Counties, CPW provided scoping comments to the BLM Field Office in February 2012 (Attachment 2) and comments on the original Draft EA in April 2012 (Attachment 3). For parcels located in Montezuma County, CPW provided scoping comments to the appropriate BLM Field Office in September 2012 (Attachment 4).

The concerns outlined in our previous comments to each BLM Field Office remain the basis for this letter. We have outlined below the concerns that are not addressed in the EAs prepared by your Field Offices. These concerns and those stated in our previous correspondence comprise our **Statement of Reasons** for objecting to the sale of the parcels listed in **Attachment 5** until the wildlife issues associated with those parcels can be resolved.

1) Economic concerns raised by CPW have not been addressed

As described in our correspondence to your Field Offices, Delta and Gunnison counties received combined economic benefits of approximately \$80.9 million in 2007 from hunting and fishing activities that support an estimated 912 jobs. Similarly, Archuleta, Dolores, La Plata, Montezuma, and San Miguel counties received combined economic benefits of approximately \$103.3 million in 2007 from hunting and fishing activities that support an estimated 1157 jobs.

The economic benefits from hunting and fishing recreational activities are a sustainable annual source of economic benefit for these counties only if wildlife populations are maintained and quality hunting and fishing opportunities continue to exist. As described in our previous correspondence, CPW anticipates that oil and gas development on the

parcels identified in Attachment 5 will decrease population levels of big game and result in lower quality and fewer hunting and fishing recreational opportunities in the affected counties, decreasing sustainable revenues from these activities. No BLM Field Offices addressed this issue in their EAs for the February 2013 sale.

2) Potential impacts to big game winter habitats and migratory corridors have not been adequately addressed

BLM's existing RMPs generally contain a Timing Limitation (TL) stipulation for crucial deer and elk winter ranges, but do not contain a TL or other stipulations to protect migration corridors. We also note that they do not address the impacts of road and well density on the effectiveness of critical deer and elk winter ranges and migration corridors. There is a growing body of evidence that TL stipulations on oil and gas development activities are not adequate to protect critical winter habitats and migratory corridors for big game. Additional limitations on the density of surface facilities in these habitats, which comprise approximately 22 percent of Colorado, may be necessary to maintain big game population levels.

To address this issue, CPW currently recommends limiting the density of surface facilities in these habitats to one well pad (or less)/mile² to maintain existing big game populations (see Attachment 1 - Lease Recommendations). This recommendation is consistent with recommendations made by other state fish and game agencies in the Rocky Mountain Region. If the well pad density on the nominated parcels cannot be limited to one pad/mile² through appropriate lease stipulations or some other planning mechanism, we recommend that BLM defer these parcels until the applicable RMPs can be amended to address this well pad and road density issue with respect to these big game habitats. We urge all BLM Field Offices to address this issue in their EAs for this lease sale.

3) Potential impacts to raptor nest sites, including bald and golden eagle nest sites, have not been adequately addressed

Some BLM Colorado RMPs contain No Surface Occupancy (NSO) stipulations to protect raptor nest sites; other BLM Colorado RMPs do not. As a result, protections are not being applied consistently to nesting raptors across the State. Field Offices without NSO stipulations in existing RMPs are relying on dated seasonal TL stipulations and Lease Notices (LN) to protect raptor nest sites. These mechanisms are not sufficiently protective of raptor nest sites that may be used year-after-year because both TL stipulations and LNs allow permanent production facilities to be built in very close proximity to active nest sites. Once an oil or gas facility is built in close proximity to a nest site (even outside the breeding season), ongoing operation and maintenance activities are required for the life of the facility and these activities may occur at any time during the breeding season.

As described in previous comments, repeated human-caused disturbance in close proximity to raptor nest sites during the incubation or nestling phase increases the probability of nest failure due to increased adult flushing frequency and time away from the nest, which increases the probability of egg incubation failure and predation on the eggs or nestlings. Even if the nest does not completely fail, human activities and habitat alteration that encroach upon active raptor nest sites, including those associated with oil and gas activities, change raptor behavior and may reduce nest productivity (i.e., numbers of chicks fledged), potentially resulting in local or regional population declines. We believe this issue can be better addressed in the EAs prepared by BLM Field Offices for the February 2013 lease sale.

4) Potential impacts to aquatic habitat and CPW mapped Recovery and Conservation Waters have not been adequately addressed

CPW maps Recovery and Conservation Waters for a variety of aquatic species. In order to avoid impacts to these habitats, CPW recommends a 300-foot NSO buffer. In addition, CPW recommends that a TL stipulation be implemented for any temporary stream crossings or other in-stream work to protect spawning activities for these species (see attached Lease Recommendations).

Several of the existing RMPs and Field Office EAs address the desired buffer around these habitats with Controlled Surface Use (CSU) stipulations or LNs. These stipulations may be adequate to address the 300-foot buffer recommended by CPW, but they are not adequate to address our TL recommendation for in-stream work. We don't believe this issue can be addressed site-specifically with Conditions of Approval on individual APDs because in some cases the recommended exclusion period exceeds 60 days (see 43 CFR 3101.1-2). If these protections cannot be added under the existing RMP or EAs, CPW recommends deferring these parcels until such time that these protections are incorporated into the RMPs and corresponding lease stipulations are included in quarterly lease sales.

Of particular concern is parcel 6619 (COC75860) that saddles Deep Creek. Deep Creek upstream from this parcel contains a conservation population of cutthroats. While most of the population occurs upstream, fish do occur on the parcel and we are part of a partnership that has been working for several years to extend the available habitat downstream. Together with the USFS, BLM, and the private landowner, several large projects have been completed on the stream including rebuilding and screening and irrigation diversion and building a large fish migration barrier below the proposed parcel. Partners have spent over \$185,000 on these projects with the aim of removing the brook trout between the two projects and then extending the cutthroat population downstream through it. The planned reclamation project is to occur in 2013 and 2014, so we expect the conservation population to be extended through the parcel this year or next.

5) Potential impacts to property interests purchased by CPW specifically for wildlife conservation values have not been adequately addressed

CPW continues to provide BLM Field Offices with information regarding State Wildlife Areas and other property interests that CPW has purchased specifically for wildlife habitat conservation. In most cases, CPW also provides information on the extent to which BLM oil and gas leasing and development without specific density limitations on surface facilities is incompatible with the conservation values for which these properties were purchased.

Parcels 6450 (COC75903), 6451 (COC75904), and 6452 (COC75905) in the February 2013 Lease Sale contain minerals beneath large portions of a 2,520 acre property on which CPW is purchasing a conservation easement (CE) to protect wildlife habitat at a cost of \$582,800. This CE is being purchased specifically to preserve a large block of unfragmented habitat and to provide remote recreational hunting opportunities in this area. These values would be compromised by leasing and development of this property for oil and gas. While CPW understands that the mineral estate is dominant regardless of a CE on the surface, we encourage BLM to only lease these parcels with an NSO stipulation to protect the conservation values of the CE. We believe that impacts to CPW's investment in this property and the associated wildlife values should receive additional consideration in the EAs prepared for the February 2013 lease sale.

Conclusion

CPW applauds BLM's leasing reform efforts, and in particular, your efforts to evaluate upcoming lease sales for potential surface conflicts and to resolve those conflicts prior to leasing. CPW is also encouraged by the close working relationships that our field staff have with BLM Field Office staff. BLM Field Office staff understand CPW's concerns, and in many cases, they have relied on information and references that CPW provided to draft portions of the effects analysis for the individual EAs that were prepared for the February 2013 lease sale.

BLM's Field Office EAs generally state that the act of leasing itself has no direct or indirect effects on wildlife. When viewed narrowly, we agree. However, given the investment backed expectation of the lessee, the property right that the lease conveys, and the extreme difficulty in modifying lease terms after they are issued, we feel we must plan as though leased parcels will eventually be developed to their fullest potential under the terms of the lease when it is issued. We will not have another opportunity to affect the terms of the lease that dictate the character of the development and associated impacts, so we should incorporate into the lease the best available information to address potential impacts when the lease is sold.

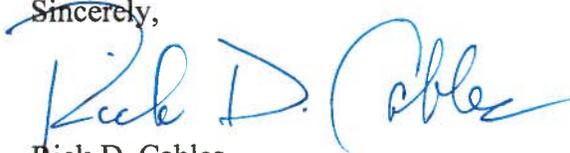
The wildlife stipulations attached to parcels nominated for lease in the February 2013 sale are limited to those contained in existing outdated RMPs and additional LNs that will not be effective for issues that warrant NSO protection or other density limits on surface facilities. Without specific NSO stipulations or other density limits on surface facilities outlined in the lease, we understand that the BLM is limited by its own regulations to relocating proposed operations no more than 200 meters or avoiding surface disturbing activities for a maximum of 60 days per year (43 CFR 3101.1-2). We advocate for additional flexibility to address the wildlife concerns raised for the parcels included in the February 2013 sale.

We are concerned that BLM Field Office staff may not have the planning tools necessary to incorporate up-to-date stipulations for wildlife resources in quarterly lease sales. With the limitations outlined in 43 CFR 3101.1-2 in mind, we recommend that the parcels identified in Attachment 5 be deferred until such time that the lease stipulations can be updated in BLM's planning documents to reflect the best available information.

CPW looks forward to continuing to work with BLM staff on leasing reform and efforts to revise existing RMPs to reflect the best available information on wildlife resources. If there are other avenues to address our concerns in the interim – until the RMP revisions are completed – we welcome the opportunity to discuss those options with you. Our hope is that implementation of consistent stipulations in RMPs and quarterly lease sales will streamline appropriate oil and gas development while also providing for the long-term conservation of wildlife resources across the State of Colorado.

If you have any questions, please contact Jon Holst, SW Region Energy Liaison, at (970) 759-9588.

Sincerely,



Rick D. Cables
Director

xc: CPW – A. Gurzick, Acting SW Region Manager; P. Dorsey, Area 15 Wildlife Manager; J. Wenum, Area 16 Wildlife Manager; Jon Holst, SW Region Energy Liaison; Scott Wait, SW Region Senior Terrestrial Biologist; John Alves, SW Region Senior Aquatic Biologist

Attachments 1 – 4

Omitted Intentionally [contact CPW for information]

ATTACHMENT 5 - Parcels Without Adequate Stipulations

<u>BLM Serial #</u>	<u>Parcel ID</u>	<u>COUNTY</u>	<u>ISSUES NOT ADDRESSED BY BLM</u>
COC75910	6401	ARCHULETA	Lost Hunting Opportunity Economic Impacts Surface Facility Density Elk Migration Corridor Elk Winter Concentration Area
COC75906	6433	LA PLATA	Lost Hunting Opportunity Economic Impacts Surface Facility Density Mule Deer Critical Winter Range
COC75907	6449	LA PLATA	Lost Hunting Opportunity Economic Impacts Surface Facility Density In-Stream work Aquatic Habitat Recov. and Conserv. Waters Elk Winter Concentration Area Mule Deer Critical Winter Range
COC75903	6450	LA PLATA	Incompatible Use with CPW Property Lost Hunting Opportunity Economic Impacts
COC75904	6451	LA PLATA	Incompatible Use with CPW Property Lost Hunting Opportunity Economic Impacts
COC75905	6452	LA PLATA	Incompatible Use with CPW Property Lost Hunting Opportunity Economic Impacts Surface Facility Density In-Stream work Aquatic Habitat Recov. and Conserv. Waters Elk Winter Concentration Area
COC75865	6604	GUNNISON	Elk Migration Corridor Lost Hunting Opportunity Economic Impacts Surface Facility Density
COC75869	6605	DELTA	Mule Deer Critical Winter Range Lost Hunting Opportunity Economic Impacts Surface Facility Density
COC75870	6606	DELTA & GUNNISON	Lost Hunting Opportunity Economic Impacts Surface Facility Density Elk Migration Corridor Mule Deer Critical Winter Range
COC75875	6607	DELTA	Lost Hunting Opportunity Economic Impacts Surface Facility Density Elk Winter Concentration Area Mule Deer Critical Winter Range

COC75876	6608	DELTA	Lost Hunting Opportunity Economic Impacts Surface Facility Density Elk Winter Concentration Area Mule Deer Critical Winter Range
COC75871	6609	DELTA	Lost Hunting Opportunity Economic Impacts Surface Facility Density Elk Migration Corridor Elk Winter Concentration Area Mule Deer Critical Winter Range
COC75877	6610	DELTA	Lost Hunting Opportunity Economic Impacts Surface Facility Density Elk Migration Corridor Elk Winter Concentration Area Mule Deer Critical Winter Range
COC75872	6611	DELTA	Lost Hunting Opportunity Economic Impacts Surface Facility Density Elk Migration Corridor Elk Winter Concentration Area Mule Deer Critical Winter Range
COC75878	6612	DELTA	Lost Hunting Opportunity Economic Impacts Surface Facility Density Elk Winter Concentration Area Mule Deer Critical Winter Range
COC75878	6613	DELTA	Lost Hunting Opportunity Economic Impacts Surface Facility Density Elk Winter Concentration Area Mule Deer Critical Winter Range
COC75879	6614	DELTA	Mule Deer Critical Winter Range Lost Hunting Opportunity Economic Impacts Surface Facility Density
COC75880	6615	DELTA	Lost Hunting Opportunity Economic Impacts Surface Facility Density In-Stream work Aquatic Habitat Recov. and Conserv. Waters Elk Migration Corridor Elk Winter Concentration Area Mule Deer Critical Winter Range
COC75866	6616	DELTA	Elk Winter Concentration Area Mule Deer Critical Winter Range Lost Hunting Opportunity Economic Impacts Surface Facility Density
COC75867	6617	DELTA & GUNNISON	Elk Winter Concentration Area Mule Deer Critical Winter Range

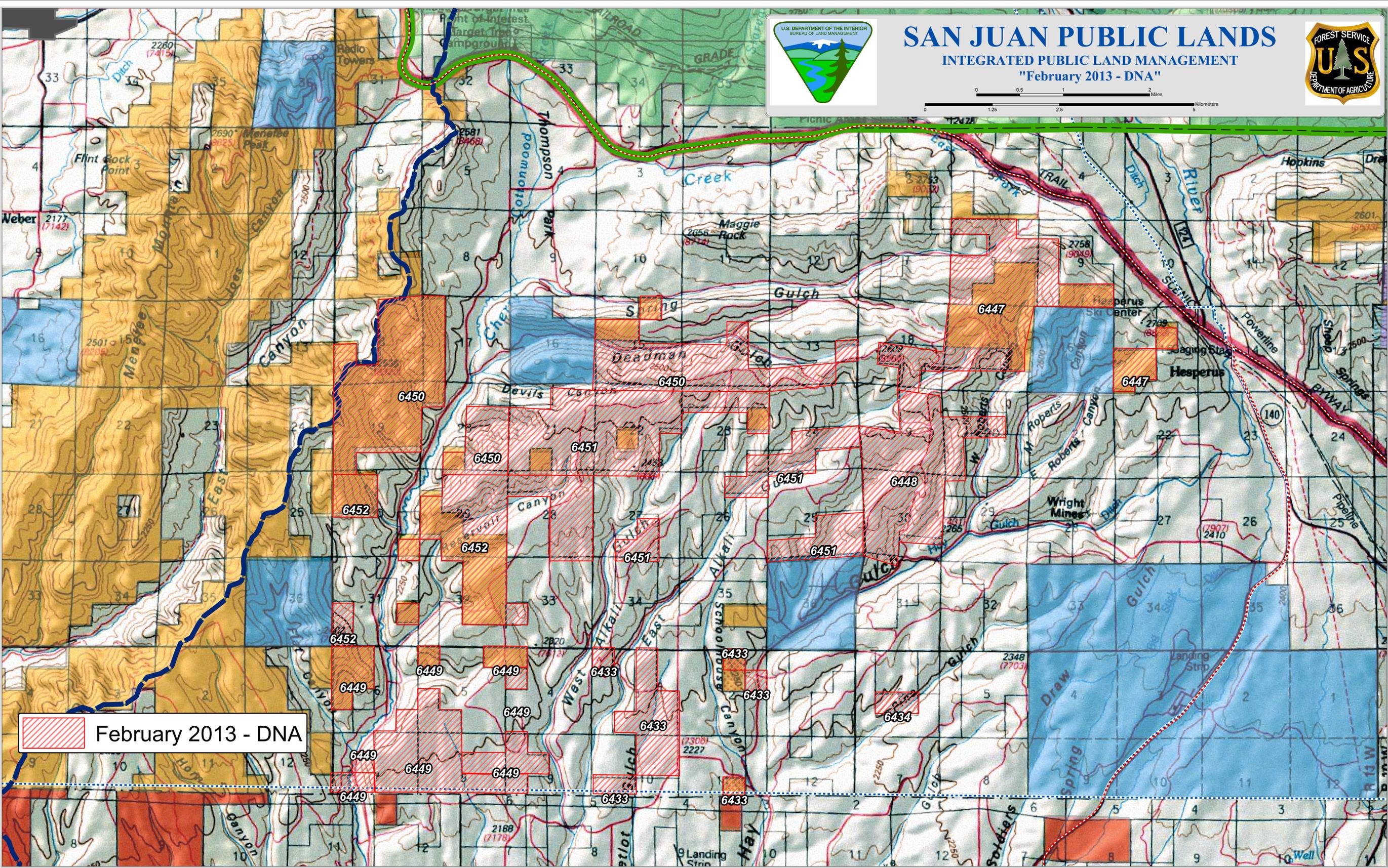
			Lost Hunting Opportunity Economic Impacts Surface Facility Density
COC75863	6618	GUNNISON	Aquatic Habitat Recov. and Conserv. Waters In-Stream work
COC75860	6619	GUNNISON	Lost Hunting Opportunity Economic Impacts Surface Facility Density In-Stream work Aquatic Habitat Recov. and Conserv. Waters Cutthroat Trout Designated Critical Habitat Elk Winter Concentration Area
COC75726	6621	DELTA	Elk Winter Concentration Area Mule Deer Critical Winter Range Lost Hunting Opportunity Economic Impacts Surface Facility Density
COC75864	6623	GUNNISON	Golden Eagle Active Nest Sites Mule Deer Critical Winter Range Lack of NSO for Rapor Nest Sites Lost Hunting Opportunity Economic Impacts Surface Facility Density
COC75868	6624	DELTA	Golden Eagle Active Nest Sites Mule Deer Critical Winter Range Lack of NSO for Rapor Nest Sites Lost Hunting Opportunity Economic Impacts Surface Facility Density



SAN JUAN PUBLIC LANDS

INTEGRATED PUBLIC LAND MANAGEMENT

"February 2013 - DNA"



 February 2013 - DNA

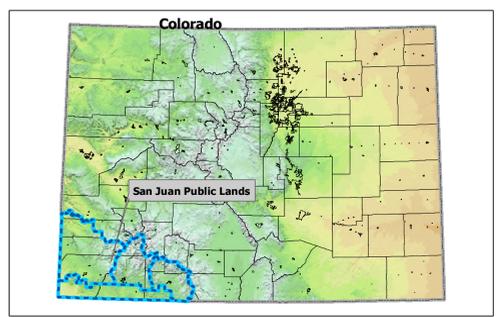
San Juan Public Lands - Legend

- | | | |
|--|---|--|
| Surface Ownership |  National Forest |  Wilderness |
|  Bureau of Land Management |  Major Waterways |  Cities |
|  National Park Service and Other Federal Land |  USFS/BLM - Ranger Districts / Field Office Boundary |  San Juan Forest Boundary |
|  Indian Reservation |  Private Land |  County Boundary |
|  State Public Use Land |  State Land Subject to Leasing |  State & Federal Highways |



NAD 83 UTM Zone 13N
MAY 9, 2010

The USFS attempts to use the most current and complete geospatial data available. Geospatial data accuracy varies by theme on the map. Using this map for other than their intended purpose may yield inaccurate or misleading results. The USFS reserves the right to correct, update or modify geospatial inputs without notification.



February 12, 2016

State Director Ruth Welch, BLM Colorado State Office
2850 Youngfield Street
Lakewood, Colorado 80215-7093

Connie Clementson, Tres Rios Field Manager
Bureau of Land Management
29211 Hwy. 84
Dolores, Colorado 81323

Transmitted by email: rwelch@blm.gov; cclementson@blm.gov



Dear State Director Ruth Welch and Tres Rios Field Manager Connie Clementson:

The Colorado Wildlife Federation and the National Wildlife Federation urge that the Bureau of Land Management (BLM) apply its master leasing planning tool to the public lands it manages in La Plata County and Montezuma County. We understand that a decision will be made in August. We also ask that additional oil and gas leasing be deferred until a decision is reached, within the spirit of the April 2014 Colorado BLM Instruction Memorandum.

A master leasing planning process will enable BLM to address the range of potential impacts of future oil and gas development on a landscape level, where there likely will be conflicts among multiple uses and the numerous resource values. The lands BLM manages in the area are situated within a mosaic of public, state, and private lands. These resources and uses include important intact wildlife habitats including big game crucial winter ranges and migration corridors, viewsheds from Mesa Verde and Canyon of the Ancients, ground water, agriculture, recreation, and archeological/cultural resources. We are optimistic that master leasing planning will be a really productive process for this area, and note our excellent experience and that of many other stakeholders during preparation for and the initial stages of master leasing planning with BLM's Royal Gorge Field Office in South Park, an area that also is a mosaic of public and private lands.

CWF and NWF look forward to the opportunity to actively work with the Tres Rios Field Office during a master leasing planning process.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne O'Neill".

Suzanne O'Neill, Executive Director
Colorado Wildlife Federation
1410 Grant St., C-313
Denver CO 80203
303-987-0400 cwfed@coloradowildlife.org

A handwritten signature in blue ink, appearing to read "Bill Dvorak".

Bill Dvorak, Public Lands Organizer
National Wildlife Federation
303 E. 17th Ave., Suite 15
Denver CO 80203
719-221-3212 dvorakb@nwf.org



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Fwd: speaking at meeting

1 message

Borders, Shannon <sborders@blm.gov>

Fri, Feb 12, 2016 at 12:56 PM

To: BLM_CO TRFO_OilandGas <blm_co_trfo_oilandgas@blm.gov>

----- Forwarded message -----

From: **Joanie Howland** <joaniehowland@gmail.com>

Date: Thu, Feb 11, 2016 at 4:01 PM

Subject: Re: speaking at meeting

To: "Borders, Shannon" <sborders@blm.gov>

Hi Shannon,

I was planning on speaking tonight at the meeting, but my husband is not feeling well and we have decided not to come. Thank you for your help. Following are my comments for the record:

Though there are a myriad of problems with oil and gas drilling for residents of the affected areas, today I'd like to mention the problem of well sites that the industry has finished with, but equipment sits idly on the surface.

A few years ago my husband and I spent a few days in Rangely. There is a canyon there along the road with rock art. The BLM did a lovely job with trails and interpretive signs. But in the middle of the area were all these abandoned well pads. It certainly made me not want to be there. On the other side of town it was even worse.

It appears that there are similar problems in eastern LaPlata county.

According to an associated press article in the Cortez Journal on January 5th there are 45,000 wells in Colorado that are ready for final reclamation. 45,000! This appears to be an industry that doesn't think it needs to clean up after itself.

I think we need to have a Master Leasing Plan to address this problem in our area. Perhaps we could encourage the drilling companies by getting a deposit that would be large enough to clean up the site in 20 years. If they reclaim the site, their money is returned. If not, it is not left to the taxpayers to clean it up, nor would the equipment be left there forever. Maybe someone else has a better idea.

I'd hate to see our area look like Rangely.

Joanie Howland

Resident of Montezuma County



February 10, 2016

State Director Ruth Welch
BLM Colorado State Office
2850 Youngfield Street
Lakewood, CO 80215
rwelch@blm.gov

Field Manager Connie Clementson
Tres Rios Field Office
Bureau of Land Management
29211 Hwy. 184
Dolores, CO 81323
cclementson@blm.gov

Re: Southwest Colorado Master Leasing Plan Process

Dear Director Welch and Field Manager Clementson:

We at Osprey Packs, the individuals and businesses listed below are very interested and invested in land management decisions that affect our community in southwest Colorado. Our business and the culture of Osprey is built on the responsible use, access and protection of our natural resources and as such we have a vested interest in what is happening in our backyard. As a growing economic engine in this region we want to be involved in the process and have a voice during the discussion. We value the amazing outdoor recreation opportunities afforded to us, including true gems like the trail system at Phil's World and the recent announcement of the proposed Paths to Mesa Verde — a multimodal trail connecting Cortez, Mesa Verde National Park and Mancos. With Osprey's investment in a new Cortez facility it is our intention to more actively host partners and guests from all over the world and proudly engage them and celebrate the unrivaled cultural and natural resources Montezuma County has to offer.

That's why we want to thank the Bureau of Land Management at both the state and local level for moving forward with a Master Leasing Plan process. A Master Leasing Plan (MLP) for southwestern Colorado will truly enhance our region by ensuring any future oil and gas development will be balanced with other important resources and interests such as our recreation opportunities, access, and economy. As a company and as individual community members in the region, we at Osprey Packs support the creation of a Master Leasing Plan because it is the best way to protect the places and natural resources that make southwest Colorado such an amazing place to live and grow our business.

We also want to acknowledge that many members of our community are volunteering their time to gather public input and participate in the MLP process. In order to make sure that our time and theirs is adequately valued, we respectfully request that the BLM defer any future oil and gas leasing in the proposed MLP area until a final decision on the plan is determined and the full planning process is

concluded. We understand the agency has deferred leasing while other master leasing plans, like Dinosaur Trails, were considered and southwest Colorado is worthy of the same treatment.

Moreover, since many of our staff members are eager to participate in the public process around the MLP, we want to better understand how this process will work. Unfortunately, beyond when and where the upcoming public meetings will take place, there is a dearth of information on how public information and comments on the MLP will be compiled, considered, and how a final recommendation will be made. Any efforts to provide clarity to our community at large would be greatly appreciated.

In summary, this issue is of the utmost importance to Osprey's growing business and our vibrant outdoor culture and we feel strongly that having a seat at the table to express our interests and concerns is important because in the end, if you are not at the table, you are on it. This home we have chosen both for business and personal reasons has far more to offer than oil and gas and we would like to see it managed in a way that carefully considers all uses, including the vast potential for exemplary outdoor recreation.

Thank you for the consideration of these issues and we look forward to working with you on this process.

Sincerely,

Osprey Packs Inc. and the following concerned individuals and businesses

- Kenny Ballard, Chief Operations Officer, Osprey Packs Inc.
- Tom Barney, Chief Executive Officer, Osprey Packs Inc.
- Diane Wren, Owner, Osprey Packs Inc.
- Mike Pfothauer, Owner/Founder, Osprey Packs Inc.
- Mychal McCormick, Osprey Packs Inc.
- Matthew Walker, Osprey Packs Inc.
- Rob BonDurant, Director of Marketing, Osprey Packs Inc.
- Geoff Peck, Osprey Packs Inc.
- Courtney Hart, Osprey Packs Inc.
- Bill Chandler, Outdoor Sales Manager, Osprey Packs Inc.
- Jeff Busic, International Sales Director, Osprey Packs Inc.
- Scott Robertson, Copywriter, Osprey Packs Inc.
- David Dunn, Operations Management, Osprey Packs Inc.
- Kimberly Mendenhall, Osprey Packs Inc.
- Emily Mason, Osprey Packs Inc.
- Rich Pierce, Dealer Services, Osprey Packs Inc.
- Sam Mix, Conduit of Corporate Outreach, Osprey Packs Inc.
- Southwest Colorado Cycling Association, Jeff Fox, President
- Kristin Carpenter Ogden, Owner/Founder, Verde Brand Communications
- Anna Peterson, Communications Specialist, Verde Brand Communications
- Pete Eschallier, Owner, Kokopelli Bike and Board
- Kathy Hands, Owner, Mancos Brewing Company
- Kristin Ruger, Concerned citizen
- Ginny Chandler, Concerned Citizen



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

2 messages

audrey@conservationco.org <audrey@conservationco.org>

Wed, Feb 3, 2016 at 10:06 AM

Reply-To: audrey@conservationco.org

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

We need to strike a balance for Southwestern Colorado, work together, and create a plan for the future that benefits the diversity of interests in our region. I want a Master Leasing Plan to, protect our public land gems, wildlife habitat, ensure protections for our air and water quality, and create smart-from-the-start planning regarding any additional roads or industry development in and around our community.

Unfortunately, the recently-completed Tres Rios Resource Management Plan (RMP) does not address this need for balance, or set out guidelines to protect our public lands or natural and economic resources in Southwestern Colorado. Please develop a Master Leasing Plan that fills in the gaps and protects our landscapes for uses besides just oil and gas development.

Thank you very much for your time.

Sincerely,

Audrey Wheeler
4250 E Cornell Ave
Denver, CO 80222-6727

Clementson, Connie <ccllementson@blm.gov>

Wed, Feb 3, 2016 at 10:11 AM

To: audrey@conservationco.org, BLM_CO TRFO_OilandGas <blm_co_trfo_oilandgas@blm.gov>

thank you..

here is the email address for this comment. I've cc'd to that address.

Connie Clementson, Field Manager
Tres Rios Field Office
office 970-882-6808
cell 970-394-4045
email: ccllementson@blm.gov

On Wed, Feb 3, 2016 at 10:06 AM, <audrey@conservationco.org> wrote:

Dear Ms. Clementson:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

We need to strike a balance for Southwestern Colorado, work together, and create a plan for the future that benefits the diversity of interests in our region. I want a Master Leasing Plan to, protect our public land gems, wildlife habitat, ensure protections for our air and water quality, and create smart-from-the-start planning regarding any additional roads or industry development in and around our community.

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Thank you very much for your time.

Sincerely,

Audrey Wheeler
4250 E Cornell Ave
Denver, CO 80222-6727



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

1 message

gkiritz@gmail.com <gkiritz@gmail.com>

Wed, Feb 3, 2016 at 12:21 PM

Reply-To: gkiritz@gmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Gabriel Kiritz
605 W 5th Ave #202
Denver, CO 80204-5104



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

1 message

matthew.sheldon9@gmail.com <matthew.sheldon9@gmail.com>

Wed, Feb 3, 2016 at 12:41 PM

Reply-To: matthew.sheldon9@gmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Matthew Sheldon
566 E 1st Unit 69
Durango, CO 81301



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

1 message

michal.rosenoer@gmail.com <michal.rosenoer@gmail.com>

Wed, Feb 3, 2016 at 11:41 AM

Reply-To: michal.rosenoer@gmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

I want an MLP that protects our public land gems like Phil's World, Mesa Verde, and Canyons of the Ancients. While some leasing may be acceptable, we cannot sacrifice our community's recreational resources and natural landscapes for oil and gas development that's neither reliable economically nor a driving source of the tourism we depend upon here in the southwest.

We also need protections for our night skies, air and water quality in this region. We don't need more unplanned roads to well pads for a failing industry - we need long-term planning to mitigate impacts, and an MLP can help us do that.

Thanks for your time.

Sincerely,

Michal Rosenoer
114 Conejo Place
Durango, CO 81301



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

Samuel Just <mailagent@thesoftedge.com>

Wed, Feb 3, 2016 at 2:21 PM

Reply-To: philyphreak2127@yahoo.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Unfortunately, the recently-completed Tres Rios Resource Management Plan (RMP) does not address this need for balance, or set out guidelines to protect our public lands or natural and economic resources in Southwestern Colorado. Please develop a Master Leasing Plan that fills in the gaps and protects our landscapes for uses besides just oil and gas development.

Thank you very much for your time.

Sincerely,

Samuel Just
2957 west centennial drive
Littleton, CO 80123



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

1 message

erica@conservationco.org <erica@conservationco.org>

Wed, Feb 3, 2016 at 5:41 PM

Reply-To: erica@conservationco.org

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

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Thank you very much for your time.

Sincerely,

Erica Mathwich
1045 S. Birch St.
Denver, CO 80246-2504



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

1 message

Jefferydelaney57@gmail.com <Jefferydelaney57@gmail.com>

Wed, Feb 3, 2016 at 9:11 PM

Reply-To: Jefferydelaney57@gmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Jeffery Delaney
2315 Albion St
Denver, CO 80207



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

1 message

drloisvk@gmail.com <drloisvk@gmail.com>

Wed, Feb 3, 2016 at 5:31 PM

Reply-To: drloisvk@gmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Lois Vanderkooi
710 Burbank St
Broomfield, CO 80020



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

1 message

lynnfrederick@fastmail.fm <lynnfrederick@fastmail.fm>

Thu, Feb 4, 2016 at 8:41 AM

Reply-To: lynnfrederick@fastmail.fm

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Lynn Frederick
721 Twin Creek Circle
Pagosa Springs, CO 81147



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

2 messages

Cherie Straub <mailagent@thesoftedge.com>

Mon, Feb 8, 2016 at 9:11 AM

Reply-To: cheriestraub@yahoo.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Cherie Straub
33468 bluebell circle
evergreen, CO 80439

Cherie Straub <mailagent@thesoftedge.com>

Mon, Feb 8, 2016 at 9:11 AM

Reply-To: cheriestraub@yahoo.com

To: bsharrow@blm.gov

Dear Ms. Sharrow:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

We need to strike a balance for Southwestern Colorado, work together, and create a plan for the future that benefits the diversity of interests in our region. I want a Master Leasing Plan to protect our public land gems, wildlife habitat, ensure protections for our air and water quality, and create smart-from-the-start planning regarding any additional roads or industry development in and around our community.

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Thank you very much for your time.

Sincerely,

Cherie Straub

2/9/2016

DEPARTMENT OF THE INTERIOR Mail - Strike a balance for Southwestern Colorado lands.

33468 bluebell circle
evergreen, CO 80439



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

2 messages

mingus59@gmail.com <mingus59@gmail.com>

Thu, Feb 4, 2016 at 9:41 PM

Reply-To: mingus59@gmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

We need to strike a balance for Southwestern Colorado, work together, and create a plan for the future that benefits the diversity of interests in our region. I want a Master Leasing Plan to protect our public land gems, wildlife habitat, ensure protections for our air and water quality, and create smart-from-the-start planning regarding any additional roads or industry development in and around our community.

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Thank you very much for your time.

Sincerely,

Eric Ming
502 Sabeta Dr
Ridgway , CO 81432

mingus59@gmail.com <mingus59@gmail.com>

Thu, Feb 4, 2016 at 9:41 PM

Reply-To: mingus59@gmail.com

To: bsharrow@blm.gov

Dear Ms. Sharrow:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

We need to strike a balance for Southwestern Colorado, work together, and create a plan for the future that benefits the diversity of interests in our region. I want a Master Leasing Plan to protect our public land gems, wildlife habitat, ensure protections for our air and water quality, and create smart-from-the-start planning regarding any additional roads or industry development in and around our community.

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Thank you very much for your time.

Sincerely,

Eric Ming

2/9/2016

DEPARTMENT OF THE INTERIOR Mail - Strike a balance for Southwestern Colorado lands.

502 Sabeta Dr
Ridgway , CO 81432



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

2 messages

Robinrichardmd@gmail.com <Robinrichardmd@gmail.com>

Fri, Feb 5, 2016 at 2:46 PM

Reply-To: Robinrichardmd@gmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

I want a Master Leasing Plan to protect our public land gems, wildlife habitat, ensure protections for our air and water quality, and create smart-from-the-start planning regarding any additional roads or industry development in and around our community.

Unfortunately, the recently-completed Tres Rios Resource Management Plan (RMP) does not address this need for balance, nor does it set out guidelines to protect our public lands or natural and economic resources in Southwestern Colorado. So much of the habitat and beauty of our state have already been ruined by oil and gas development. The short-term monetary gain of corporations and of local jobs cannot come at the expense of sacrificing the long-term well-being of the people and ecosystems of this region and world. A plan that limits oil and gas leasing is an opportunity to protect habitats, people, and animals (all of which are way more valuable than monies obtained from extractive industries) is a plan that ultimately serves the greater good.

Sincerely,

Robin Richard
196 Trail Wood Drive
Durango, CO 81303

Robinrichardmd@gmail.com <Robinrichardmd@gmail.com>

Fri, Feb 5, 2016 at 2:46 PM

Reply-To: Robinrichardmd@gmail.com

To: bsharrow@blm.gov

Dear Ms. Sharrow:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

I want a Master Leasing Plan to protect our public land gems, wildlife habitat, ensure protections for our air and water quality, and create smart-from-the-start planning regarding any additional roads or industry development in and around our community.

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Sincerely,

Robin Richard

2/9/2016

DEPARTMENT OF THE INTERIOR Mail - Strike a balance for Southwestern Colorado lands.

196 Trail Wood Drive
Durango, CO 81303



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

3 messages

annaeswanson@hotmail.com <annaeswanson@hotmail.com>

Wed, Feb 10, 2016 at 10:26 AM

Reply-To: annaeswanson@hotmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

We need to strike a balance for Southwestern Colorado, work together, and create a plan for the future that benefits the diversity of interests in our region. I want a Master Leasing Plan to protect our public land gems, wildlife habitat, ensure protections for our air and water quality, and create smart-from-the-start planning regarding any additional roads or industry development in and around our community.

Unfortunately, the recently-completed Tres Rios Resource Management Plan (RMP) does not address this need for balance, or set out guidelines to protect our public lands or natural and economic resources in Southwestern Colorado. Please develop a Master Leasing Plan that fills in the gaps and protects our landscapes for uses besides just oil and gas development.

Thank you very much for your time.

Sincerely,

Anna Peterson
2495 COUNTY ROAD 203
Durango, CO 81301-6129

annaeswanson@hotmail.com <annaeswanson@hotmail.com>

Wed, Feb 10, 2016 at 10:26 AM

Reply-To: annaeswanson@hotmail.com

To: bsharrow@blm.gov

Dear Ms. Sharrow:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Anna Peterson

2495 COUNTY ROAD 203
Durango, CO 81301-6129

Sharrow, Barbara <bsharrow@blm.gov>
To: BLM_CO TRFO_OilandGas <blm_co_trfo_oilandgas@blm.gov>

Wed, Feb 10, 2016 at 10:50 AM

----- Forwarded message -----
From: <annaeswanson@hotmail.com>
Date: Wed, Feb 10, 2016 at 10:26 AM
Subject: Strike a balance for Southwestern Colorado lands.
To: bsharrow@blm.gov

Dear Ms. Sharrow:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Sincerely,

Anna Peterson
2495 COUNTY ROAD 203
Durango, CO 81301-6129



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

3 messages

Anita Craig <mailagent@thesoftedge.com>

Wed, Feb 10, 2016 at 11:46 AM

Reply-To: Strtch6832@aol.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Anita Craig
30 Highland Ct.
South Fork , CO 81154

Anita Craig <mailagent@thesoftedge.com>

Wed, Feb 10, 2016 at 11:46 AM

Reply-To: Strtch6832@aol.com

To: bsharrow@blm.gov

Dear Ms. Sharrow:

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Thank you very much for your time.

Sincerely,

Anita Craig

30 Highland Ct.
South Fork , CO 81154

Sharrow, Barbara <bsharrow@blm.gov>
To: BLM_CO TRFO_OilandGas <blm_co_trfo_oilandgas@blm.gov>

Wed, Feb 10, 2016 at 12:00 PM

----- Forwarded message -----

From: **Anita Craig** <mailagent@thesoftedge.com>
Date: Wed, Feb 10, 2016 at 11:46 AM
Subject: Strike a balance for Southwestern Colorado lands.
To: bsharrow@blm.gov

Dear Ms. Sharrow:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Sincerely,

Anita Craig
30 Highland Ct.
South Fork , CO 81154



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

2 messages

Susan Rose <mailagent@thesoftedge.com>

Wed, Feb 10, 2016 at 1:56 PM

Reply-To: b1rder2@yahoo.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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This area has some of the most beautiful scenery in the U.S. Tourists do NOT want to look at oil and gas wells and flares!!! Please take into consideration the importance of preserving pristine areas such as this for future generations! Short term gains for the oil and gas industry are NOT worth the damage they will do!!

Thank you very much for your time.

Sincerely,

Susan Rose
Box 72
Ovid, CO 80744

Susan Rose <mailagent@thesoftedge.com>

Wed, Feb 10, 2016 at 1:56 PM

Reply-To: b1rder2@yahoo.com

To: bsharrow@blm.gov

Dear Ms. Sharrow:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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2/10/2016

DEPARTMENT OF THE INTERIOR Mail - Strike a balance for Southwestern Colorado lands.

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Sincerely,

Susan Rose
Box 72
Ovid, CO 80744



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

2 messages

eliza.carter34@gmail.com <eliza.carter34@gmail.com>

Fri, Feb 19, 2016 at 10:26 AM

Reply-To: eliza.carter34@gmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Eliza Carter
700 N Washington St.
Denver, CO 80203

eliza.carter34@gmail.com <eliza.carter34@gmail.com>

Fri, Feb 19, 2016 at 10:26 AM

Reply-To: eliza.carter34@gmail.com

To: bsharrow@blm.gov

Dear Ms. Sharrow:

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Thank you very much for your time.

Sincerely,

Eliza Carter

2/22/2016

DEPARTMENT OF THE INTERIOR Mail - Strike a balance for Southwestern Colorado lands.

700 N Washington St.
Denver, CO 80203



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

3 messages

chomontezuma@gmail.com <chomontezuma@gmail.com>

Thu, Feb 11, 2016 at 12:11 PM

Reply-To: chomontezuma@gmail.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

gretchen groenke
po box 1202
mancos, CO 81328

chomontezuma@gmail.com <chomontezuma@gmail.com>

Thu, Feb 11, 2016 at 12:11 PM

Reply-To: chomontezuma@gmail.com

To: bsharrow@blm.gov

Dear Ms. Sharrow:

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Thank you very much for your time.

Sincerely,

gretchen groenke

po box 1202
mancos, CO 81328

Sharrow, Barbara <bsharrow@blm.gov>
To: BLM_CO TRFO_OilandGas <blm_co_trfo_oilandgas@blm.gov>

Fri, Feb 12, 2016 at 1:06 PM

----- Forwarded message -----
From: <chomontezuma@gmail.com>
Date: Thu, Feb 11, 2016 at 12:11 PM
Subject: Strike a balance for Southwestern Colorado lands.
To: bsharrow@blm.gov

Dear Ms. Sharrow:

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Thank you very much for your time.

Sincerely,

gretchen groenke
po box 1202
mancos, CO 81328



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

2 messages

katslaughter@msn.com <katslaughter@msn.com>

Wed, Feb 17, 2016 at 8:16 PM

Reply-To: katslaughter@msn.com

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

Thank you for providing opportunities for local residents to weigh in on the Tres Rios Master Leasing Plan. I appreciate knowing that my voice will be heard in these long-term decisions.

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Thank you very much for your time.

Sincerely,

Kathy Slaughter
2990 1/2 RED WILLOW DR
Grand Junction, CO 81504

katslaughter@msn.com <katslaughter@msn.com>

Wed, Feb 17, 2016 at 8:16 PM

Reply-To: katslaughter@msn.com

To: bsharrow@blm.gov

Dear Ms. Sharrow:

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Thank you very much for your time.

Sincerely,

Kathy Slaughter

2/22/2016

DEPARTMENT OF THE INTERIOR Mail - Strike a balance for Southwestern Colorado lands.

2990 1/2 RED WILLOW DR
Grand Junction, CO 81504



TRFO_OilandGas, BLM_CO <blm_co_trfo_oilandgas@blm.gov>

Strike a balance for Southwestern Colorado lands.

3 messages

tsykes@swhealth.org <tsykes@swhealth.org>

Fri, Feb 12, 2016 at 10:21 AM

Reply-To: tsykes@swhealth.org

To: blm_co_trfo_oilandgas@blm.gov

Dear Tres Rios Field Office:

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Thank you very much for your time.

Sincerely,

tom sykes
po box 1122
dolores, CO 81323

tsykes@swhealth.org <tsykes@swhealth.org>

Fri, Feb 12, 2016 at 10:21 AM

Reply-To: tsykes@swhealth.org

To: bsharrow@blm.gov

Dear Ms. Sharrow:

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Sincerely,

tom sykes

po box 1122
dolores, CO 81323

Sharrow, Barbara <bsharrow@blm.gov>
To: BLM_CO TRFO_OilandGas <blm_co_trfo_oilandgas@blm.gov>

Fri, Feb 12, 2016 at 12:31 PM

----- Forwarded message -----
From: <tsykes@swhealth.org>
Date: Fri, Feb 12, 2016 at 10:21 AM
Subject: Strike a balance for Southwestern Colorado lands.
To: bsharrow@blm.gov

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