a b

* The Wilderness Society * Southern Utah Wilderness Alliance *
* Center for Native Ecosystems * Colorado Environmental Coalition *

c d

August 9, 2010

Helen Hankins, Director
Colorado State Office
Bureau of Land Management
2850 Youngfield Street
Lakewood, CO 80215

Juan Palma, Director
Utah State Office
Bureau of Land Management
PO Box 45155
Salt Lake City, UT 84145

Kent Walter, Field Manager
BLM White River Field Office
220 E. Market Street
Meeker, CO 81641

Mike Stiewig, Field Manager
BLM Vernal Field Office
170 South 500 East
Vernal, UT 84078

Dear Sirs and Madam:

Attached please find a recommendation for the Bureau of Land Management Colorado and Utah State Offices and White River and Vernal Field Offices to prepare a "Master Leasing Plan" for BLM lands managed by the aforementioned field offices. This recommendation is submitted on behalf of The Wilderness Society, Southern Utah Wilderness Alliance, Center for Native Ecosystems and Colorado Environmental Coalition. We are aware that under the terms of IM No. 2010-117, each BLM State Office is directed to submit an implementation plan and timeline to the Director for fulfilling the terms of the IM by August 16, 2010.

We have taken the opportunity to prepare the enclosed recommendation to assist you in fulfilling this mandate, and look forward to working with the BLM in the preparation of an "Eastern Book Cliffs/Piceance Basin Master Leasing Plan." Please contact us if you have any questions or would like additional information or data.

Sincerely,

Nada Culver, Director and Senior Counsel
The Wilderness Society BLM Action Center
1660 Wynkoop St. Ste. 850
Denver, CO 80202
(303) 650-5818

Steve Bloch, Energy Program Director and Attorney
Southern Utah Wilderness Alliance
425 East 100 South
Salt Lake City, UT 84111
(801) 486-3161

Josh Pollock, Conservation Director
Center for Native Ecosystems

1536 Wynkoop St. Ste. 303
Denver, CO 80202
(303) 546-0214

Luke Schafer, Northwest Campaign Coordinator
Colorado Environmental Coalition
529 Yampa Ave.
Craig, CO 81625
(970) 824-5241

Enclosure – MLP Proposal for Eastern Book Cliffs/Piceance Basin and associated maps
Cc: Assistant Secretary Wilma Lewis
Deputy Assistant Secretary Sylvia Baca
Deputy Assistant Secretary Ned Farquhar
Director Bob Abbey
Deputy Director Mike Pool
Deputy Director Marcilynn Burke

Master Leasing Plan Recommendation:

Eastern Book Cliffs/Piceance Basin

Prepared by

The Wilderness Society, Colorado Environmental Coalition, Center for Native Ecosystems, and Southern Utah Wilderness Alliance

Summary: The Eastern Book Cliffs/Piceance Basin area of Colorado and Utah is an area of significant ecological importance, much of which is included in citizens' wilderness proposals. Over 233,000 acres of proposed wilderness, including the Dragon Canyon, Bitter Creek, Lower Bitter Creek, Big Ridge, Oil Spring Mountain, Sweet Water Canyon, Seep Canyon, Cripple Cowboy, Hells Hole Canyon, and Sunday School CWPs are located within the proposed MLP. These exquisite landscapes along with high quality big game species draw people to this area from around the country, particularly for an unparalleled hunting experience. Situated alongside these valuable natural and recreational attributes lies some of the most sought after oil and gas resources in the Western United States. Though conflict of interests among key stakeholders is presumably unavoidable, more effective management plans are necessary to protect wilderness-quality lands, sensitive habitats, and hunting opportunities while simultaneously promoting development in a sustainable manner.

I. Area Name and Location:

Eastern Book Cliffs/Piceance Basin - located in Western Colorado, Eastern Utah

II. Summary Data (best estimate based on GIS layers provided/available):

- **BLM Field office and counties** = Colorado: White River Field Office, Rio Blanco and Garfield Counties. Utah: Vernal Field Office, Uintah and Grand Counties.
- **Relevant RMP** = White River RMP, Vernal RMP, and White River RMP amendment
- **Map** = see attachments
- **Total acres** = 847,484 acres
- **% Federal lands** = 82% (692,945 acres)
- **% Federal minerals** = 89%* (445,561 acres)
- **% leased** = 56% (474,772 acres)

*Utah BLM was not able to provide any map or data of the federal mineral estate in Utah, so this number refers to the Colorado portions of the MLP proposal.

III. Indications of Industry Interest

The Colorado side of the Piceance Basin has long been targeted and developed by industry, while Utah's southeast Book Cliffs region has remained largely intact with few producing wells. Most of the Colorado side is leased and industry continues to nominate parcels. On the Utah side, there is a recent trend of industry requesting approved APDs to be returned, resulting in the termination of the Gorge Spring unit

agreement. The 2008 Vernal RMP made 90% of the field office available to oil and gas leasing[1], and the 1997 White River RMP made 95% available to leasing[2], including lands with stipulations.

In 2006, BLM began an oil and gas amendment to the White River RMP, which was instigated and paid for by the oil and gas industry. The 1997 RMP estimated a reasonable foreseeable development (RFD) scenario at 1,100 wells, and the RFD for the amendment would allow for a range of up to 21,200 wells. This clearly demonstrates industry interest in leasing and developing this area.

IV. Potential Resource Conflicts

Background on Values for the Proposed Area:

Wilderness-Quality Lands

The proposed Eastern Book Cliffs MLP includes citizen proposed wilderness areas in Colorado and Utah. These include Bitter Creek, Dragon Canyon, Cripple Cowboy, Sweet Water Canyon, Hells Hole Canyon, Seep Canyon, Sunday School, Lower Bitter Creek, Big Ridge, and Oil Spring Mountain. All of these proposed wilderness areas have been included in Congresswoman DeGette's Colorado Wilderness Act and Congressman Hinchey's Red Rock Wilderness Act (Utah). These two pieces of legislation have been introduced in Congress multiple times, and include valuable and high-profile lands for conservation groups and the American public.

The Eastern Book Cliffs/ Piceance Basin region lies at the northernmost extent of the Colorado Plateau.

Bitter Creek CWP[3] (Utah and Colorado)

The Bitter Creek proposed wilderness unit straddles the Colorado/Utah state lines high in the remote Eastern Book Cliffs. The area contains spectacular scenic vistas and offers sublime opportunities for solitude. Deep canyons cut through the pale Mesa Verde sandstone, and crenellated ridges buttress the sky. Within the unit, elevations range from 6,000 to 8,000 feet, and canyon slopes rise 600 to 800 feet. Bitter Creek and Rat Hole Canyon, two major drainages, wind through the area, each extending a number of side canyons like fingers into the surrounding mesas.

Vital riparian zones support box-elders and aspens, willows, sedges, and various reptile and amphibian species along the waterways in the canyon bottoms. Many wet meadow areas punctuate the folded landscape and support communities of grasses and wildflowers, insects and birds. At lower elevations, bench- and ridge-top vegetation consists of sagebrush, rabbitbrush, greasewood, and a variety of grasses. Above 7,400 feet, the drainages are dominated by pinyon-juniper woodlands on south facing slopes, and by Douglas-firs and quaking aspens on the northern aspects. Peregrine falcons and golden eagles nest in the cliffs and hunt in the river drainages, deer and elk forage along the mesa tops and in the canyons, and black bears roam the broken terrain.

---

[1] Vernal ROD, p. 20

[2] White River ROD, p. 2-5

[3] In its 1999 Utah Wilderness Inventory, BLM determined that the so-called "Cripple Cowboy" wilderness inventory area had wilderness characteristics, http://www.access.gpo.gov/blm/utah/pdf/ne142.pdf, a determination BLM confirmed in the Vernal RMP – along with acknowledging for the first time that the citizen's "Bitter Creek" unit have wilderness characteristics. Vernal PRMP/FEIS at 3-45 to -47. *See generally* http://www.blm.gov/ut/st/en/fo/vernal/planning/supplemental_rmp/background_documents.html. The citizen's proposed "Bitter Creek" unit includes both the Cripple Cowboy and Bitter Creek units.

With its convoluted topography, screening vegetation, and wide variety of plant and animal species, the Bitter Creek Addition provides outstanding opportunities not only for solitude, but also for primitive and unconfined recreation. Hunting, fishing, camping, hiking, photography, and wildlife viewing are all popular in the area. Backpacking and horseback riding opportunities abound in the area's many and extensive scenic side canyons.

In addition to the inspiring scenery and vital habitat, a number of pictograph and petroglyph sites, as well as historic homesteads, grace the area, lending it archaeological and historical significance. Queen Chipeta, wife of Ute Chief Ouray, was intelligent, talented, and hard working, a model of constancy and courage during a desperate time. She acted as a messenger of goodwill between Indians and Whites, meeting with President McKinley and performing many acts of kindness and sacrifice, and thus earning her place among tribal leaders. Her eponymous canyon traverses the heart of the Bitter Creek Wilderness in Utah and provides access to many side canyons. Her legend informs the rich cultural heritage of the area.

In addition to documenting wilderness characteristics, Utah BLM found the area to meet relevance and importance criteria for designation as an Area of Critical Concern based on these same values, stating:

> **Bitter Creek and Bitter Creek-P.R. Springs**
>
> **Relevance Criteria:** The area has relevance due to the existence of an old growth forest, significant cultural and historic resources, important watershed, and critical ecosystem for wildlife and migratory birds.
>
> **Importance Criteria:** The relevant values described above have substantial significance due to qualities that make it fragile, sensitive, rare, irreplaceable, exemplary, and unique. The ancient pinyon forest is over 1200 years old, and includes the Utah champion pinyon, which is irreplaceable. Within the unit is the ancestral home of the Northern Ute Tribe when they were relocated from Colorado in the late 1800s. Many features, including graves, are within the potential ACEC, but specific locations are not known. Also in the potential ACEC is the most extensive wetland in the multi-state Book Cliffs. It exists because of a uniquely perched water table. This wetland and surrounding watershed is unique as a critical ecosystem for migratory birds and a wide variety of wildlife. (Vernal RMP Draft RMP at G-4,5)

Dragon Canyon CWP (Utah and Colorado)

The Dragon Canyon proposed wilderness unit consists of several large canyons that run south to north to Evacuation Creek. These include Davis, Side, Atchee, and Dragon Canyons in Utah, and Little Whiskey Creek in Colorado.

In this area, vital riparian zones support box elders and aspens, willows, sedges, and various reptile and amphibian species along the waterways in the canyon bottoms. Many wet meadow areas punctuate the folded landscape and support communities of grasses and wildflowers, insects and birds. At lower elevations, bench- and ridge top vegetation consists of sagebrush, rabbitbrush, greasewood, and a variety of grasses. Above 7,400 feet, the drainages are dominated by pinyon-juniper woodlands on south facing slopes, and by Douglas-firs and quaking aspens on the northern aspects. Peregrine falcons and golden eagles nest in the cliffs and hunt in the river drainages; deer and elk forage along the mesa tops and in the canyons; and black bears roam the broken terrain. Other wildlife species include Townsend's big-eared bat, dwarf shrew, ringtail cat, Lewis' woodpecker, and ferruginous hawk and black

bear fall concentration area. Expanding upon the important watershed values in Utah, the area provides protection for Whiskey Creek, Little Whiskey Creek, Tent Creek, Davis Creek, and West Evacuation Creek.

Significant cultural resources are found within the broader area. According to the Colorado Office of Archaeology and Historic Preservation there are forty-three registered sites with the Colorado portion of the Dragon Canyon unit alone. The type and significance of these sights is not available to the public. Superior visual resources exist in the area and the ACEC should include scenic qualities as a protected value.

These values are also significant, relevant and important given the threats these and similar values face in the broader landscape. The Utah BLM found the Utah portions of the Dragon/Atchee/Davis Canyon area to have relevant "Scenic, cultural resources and natural systems." (Vernal RMP DEIS at G-7). Within the broader context of the Piceance Basin and the threats to the area (described below) these values are of substantial significance and must be protected.

Sweet Water Canyon CWP (Utah)

The Sweet Water Canyon proposed wilderness is located along the Book Cliffs Divide and is dominated by three deep canyons—Railroad, Dry, and Sweet Water. Each one of these canyon drains to the north with vegetations consisting of pinyon and juniper, Douglas fir on northern aspects, ridges dominated by brush and oak and canyon bottoms with large sagebrush communities. Aspens are found throughout the area, but mostly at the head of the canyons in the south. Elevations range from 8,300 feet in the south and along the ridges to around 7,000 feet at the confluence of South and Sweet Water Canyon.

Wildlife is abundant and includes elk, mule deer, cougar, ravens, ground squirrel, and black bear. Specifically, this area includes the largest remaining population of black bear in the state of Utah, as well as crucial fawning habitat and crucial summer range for mule deer and elk, as well as for elk. The area is popular with hunters and often produces trophy game.

Native Americans frequented this area and have left several petroglyphs on the rock at the confluence of Sweet Water and South Canyon.

Views of the surrounding region are spectacular with prominent features as the Uinta Mountains, Split Mountain, Blue Mountain and Cliff Ridge. The steep cliffs around Bitter Creek before it enters the White River and the prominent buttes in the UWC Lower Bitter Creek unit can also be seen.

In 2007, BLM's Vernal field office agreed that the 6,994 Sweet Water Canyon proposed wilderness unit has wilderness characteristics. BLM reported that "[t]he alternative ridges and deep, steep walled canyons" provide a high degree of naturalness as well as solitude and opportunities for primitive and unconfined recreation.

Hells Hole Canyon CWP (Utah)

The Hells Hole Canyon proposed wilderness includes public lands managed by both Moab and Vernal field offices, located in Grant and Uintah counties respectively.[4] The Hells Hole Canyon unit lies along the Bookcliffs Divide with the majority on the southern aspect of this feature. County Line Ridge and an

[4] The Hells Hole Canyon proposed wilderness also extends into Colorado where it is known as the "Prairie Canyon" proposed wilderness.

unnamed ridge separate watersheds from the White River and the Colorado River, while the majority of the landscape is within the Colorado River watershed. Within this unit, several large canyons exist including Hells Hole, Tony and Lee Canyons with many more unnamed.

Vegetation consists of vast areas of pinyon and juniper forests, oak, sagebrush, native grasses, Douglas fir along northern aspects and isolated stands of aspens. Wildlife includes, mule deer, elk, cougar, black bear, ground squirrel and a variety of birds.

Views from within these units are some of the best in the region, with those from County Line Ridge being particularly impressive. From that vantage, there are clear views of the Uinta Mountains to the north, and Grand Mesa, Uncompahgre Plateau, La Sal Mountains and the distant San Juan Mountains to the south.

In 2005, the Moab field office determined that 2,538 acres of the proposed Hells Hole Canyon wilderness unit in Grand County contains wilderness characteristics. Later, in 2007, the Vernal field office determined that an additional 2,709 acres in Uintah County also contains wilderness characteristics, noting that "[t]he steep slopes, canyons, and heavy vegetation screen the visitor and provide opportunities for solitude and primitive and unconfined recreation."

Lower Bitter Creek CWP (Utah)

The Lower Bitter Creek proposed wilderness unit is dominated by Lower Bitter Creek itself, with its rich riparian corridor and intermittent stream that runs northwest to southeast through the center of the unit. Several deep washes enter Bitter Creek as it passes through this unit. In addition, some portions of the unit are desert landscape with sparse vegetation, while other locations support thick pinyon and juniper forests intermixed with sagebrush parks. The unit also has several prominent unnamed rock buttes that present striking features in the landscape.

Bitter Creek and its drainage, which provides excellent wildlife habitat for many State sensitive species including ferruginous hawk, burrowing owl, sage grouse, bald eagle, dwarf shrew, ringtail cat, black-footed ferret, as well as big game species such as mule deer and elk. Occasionally, a cougar or a bobcat can be seen. This unit may also be home to the Graham Beardtongue (penstemon Grahamii), a state sensitive plant species. A short day hike to several of the buttes provides unsurpassed views of this unique geologic region.

In 2007, the Vernal field office determined that 11,417 acres of the proposed Lower Bitter Creek wilderness unit contain wilderness characteristics.

Sunday School Canyon CWP (Utah)

The Sunday School Canyon proposed wilderness unit is adjacent to the northern boundary of the Winter Ridge wilderness study area and is bounded topographically by Wood Canyon on the south, Buck Canyon to the north, the Willow Creek drainage on the west, and Seep Ridge to the east. Beyond adopting the name of its most prominent feature, the unit encompasses the entire Sunday School Canyon drainage. Upper portions of this canyon system are broad, shallow, and park-like. The canyon becomes increasingly entrenched as one proceeds down through its multiple layers of exposed geology. During wetter periods, the area is drained by an intermittent stream that runs through this canyon.

Pinyon and Juniper forests that dominate the higher elevations within the unit become less prominent in lower areas. Other vegetation, including sagebrush, cactus, yucca, rabbitbrush, and native grasses are

interspersed throughout the unit. The transition from lower desert to higher forested areas is important to wildlife and primitive recreation opportunities.

Wildlife viewing opportunities abound, as the unit is critical deer and elk winter habitat. In addition, on a hike up a canyon or along a ridge, a visitor may observe wild horses galloping through the landscape, or raptors circling for prey or soaring on thermals. The unit also contains either substantial, high-value, or substantial habitat for certain species of special concern, including: the state threatened ferruginous hawk, bald eagle, the burrowing owl, big free-tailed bat, sage grouse, Lewis' Woodpecker, ringtail cat, dwarf shrew, short-eared owl, Townsend's big-eared bat, and Utah Milk Snake. Special status plant species within the unit include the federally threatened Uinta Basin Hookless cactus, the Graham's beardtongue (an ESA candidate), and the Barneby's columbine, the Caespitose Cats-eye, the Grass Goldenweed, and Garrett's beardtongue.

The varied topography, wildlife, scenic vistas, and vegetation combine to create an overwhelmingly natural landscape with outstanding opportunities for solitude and a primitive, unconfined type of recreation. The unit offers incredible sight-seeing, with dramatic views of several prominent geological features including Big Pack Mountain, the Uinta Mountains, the Willow Creek drainage, the southern portions of Seep Ridge, and Bates Knolls. In addition, the potential for cultural sites exists along Willow Creek and its side drainages, as well as along Seep Ridge.

Seep Canyon CWP (Utah)

The Seep Canyon proposed wilderness unit is comprised of sandstone rimrocks, towering cliffs, broken slopes, broad valleys, and endless ridge lines. Besides Seep Canyon and Seep Ridge, other predominant canyons and ridges include Park Canyon, Park Ridge, Crooked Canyon, and many other side canyons and nameless draws and ridge lines. The several canyon systems drain north toward Sweet Water Canyon. The scenery created by this topographic feature is both stunning and intricate, and more distant views of the prominent buttes within the Lower Bitter Creek proposed wilderness unit, and McCook Ridge are spectacular.

Dense pinyon and juniper forests that dominate the landscape are interspersed with sagebrush, grasses, oakbrush cacti, yucca, and other species. Isolated stands of aspen and Douglas fir are also present within the unit.

The Seep Canyon wilderness unit is important habitat for elk, deer, and several other wildlife species; cougar, and golden eagles are also present. In addition, the area overlaps lands subject to a long-term black bear study by Brigham Young University and sponsored by the Utah Division of Wildlife Resources. The area also contains habitat for the federal and state threatened Mexican spotted owl, the federal and state endangered Willow Flycatcher; and the state threatened Ferruginous Hawk, and provides critical habitat for the Northern Goshawk, and ringtail cat; and high value habitat for the Bald Eagle, Burrowing Owl, Lewis' Woodpecker, Williamson's Sapsucker, Townsend's Big-eared bat, and the Utah Milk Snake.

Main Canyon Potential Area of Critical Environmental Concern (Utah)

The Main Canyon potential area of critical environmental concern (ACEC) covers much of the Seep Canyon and Sunday School Canyon proposed wilderness units. The Vernal field office acknowledged that the Main Canyon potential ACEC has the necessary "relevant and important" values for formal ACEC designation. The field office describes the Main Canyon potential ACEC this way:

Relevance Criteria: This area has relevance due to the existence of important cultural and historic resources, and natural systems.

Importance Criteria: The relevant values described above have substantial significance due to qualities that make them fragile, sensitive, rare, irreplaceable, exemplary, and unique. Within the area there are numerous sites associated with the historic Northern Ute migration route along Main Canyon. In addition, there is a recently discovered historic inscription from the early French fur trade era. This area has been the focus of several past proposals to manage it in a way that would accentuate its exemplary natural systems. It is a part of a larger area that was first proposed as a Book Cliffs National Conservation Area, and then became the focus of a 1998 cooperative project of the BLM and the Utah Division of Wildlife Resources (UDWR) known as the Book Cliffs Conservation Initiative. Most of the potential ACEC is within the Winter Ridge Wilderness Study Area.[5]

Oil Spring Mountain CWP (Colorado)

Oil Spring Mountain is roughly 25,000 acres that have been identified by the citizens of Colorado as having outstanding wilderness characteristics. The unit is wild, rugged, and topped with untracked acres of woods where wild horses are known to live. The blend of dense hardwood stands and open pinyon meadows is unlike any other Colorado wilderness. From the top of Oil Spring Mountain an endless succession of wooded mesas fades into the blue and gray of the Tavaputs Plateau in Utah. Ravines cut the massive flat-top and escarpments which run north and south for miles to the western tip of Oil Spring Mountain. The northern slopes of Oil Spring Mountain rise through dense conifer forest to small stands of aspen beneath the upper cliffs. On southern exposures, mountain mahogany, oak, pinyon, and juniper prevail. The numerous vegetation types are utilized by a diversity of wildlife.

The Colorado Division of Wildlife's wildlife management data sets have several overlaps with the Oil Spring Mountain Proposed Wilderness area, indicating that the proposed wilderness area is important habitat for several game species. Because the larger landscape is dominated by gas developments (roads, pipelines and well pads), the undeveloped oil spring mountain is critical for wildlife. Black bear use the area for fall concentration and overall range. Elk use the area for over all range, summer and winter range and winter concentration. The Oil spring Mountain area overlaps with mountain lion overall range. Mule deer use the area for overall, summer and winter range.

The highest known cultural resource density (one site per 32 acres) in BLM's White River Resource Area occurs in the area. Artifacts and rock art from prehistoric sites indicate that the area was occupied from approximately 7,000 years ago to the late 1870s. There are three known petroglyph panels within Oil Spring Mountain. The Colorado Office of Archaeology and Historic Preservation has identified 57 sites within the Oil Spring Mountain proposed Wilderness area. The sites are likely associated with the Fremont Culture. Because of the sensitive nature of the data managed by the Colorado Office of Archaeology and Historic Preservation, details on the sites are not provided. But the type of sites can

[5] Vernal PRMP/FEIS, Appendix G-3.

range for prehistoric such as the Fremont culture type-site historic sites related to early settlers and more recent activity.

In the late 1970s the BLM found the Oil Spring Mountain WSA to be affected primarily by the forces of nature and to be natural, even with existing leases, stating:

> Pre-FLPMA mineral leases carry no right of access across intervening federal lands, so development of the pre-FLPMA leases in Oil Spring Mountain is by no means a foregone conclusion. The Oil Spring Mountain WSA is predominantly natural in character with negligible human imprints. The flat-topped Oil Spring Mountain dominates the southeastern half of the WSA with associated ridges and numerous drainages radiating out in all directions. The WSA trends to the northwest from Oil Spring Mountain as elevations drop and landforms change from a mountain to arid slickrock type/landscapes with numerous sandstone draws, a cave and natural arch. Natural earth flows have occurred in several locations on the highly erosive soils an Oil Spring Mountain. Elevations range from 6,00o feet in the northwest to 8,550 feet on Oil Spring Mountain.
>
> At least 5 separate and diverse botanic communities are found in the WSA. The lower elevations support saltbush/greasewood, sagebrush steppe, and pinyon-juniper woodland plant communities. Dense mountain shrub communities with mountain mahogany, serviceberry, snowberry, oak scrub, pockets of aspen trees, and associated mountain shrub species dominate the mid to upper slopes. A dense stand of Douglas fir, and associated understory, dominates the top of Oil Spring Mountain.
>
> [...]
>
> Only minor imprints of humans are scattered around the periphery of the WSA. Existing range improvements within the WSA include 5 improved springs and 7 stock ponds which are screened by vegetation and topography. Eleven abandoned or plugged drill holes occur within the WSA and 2 shut-in gas wells are in the 43 western portion of the WSA, all of which are well screened by vegetation or topography and remain substantially unnoticeable with in the area.- *Wilderness Study Report Volume One, Craig District Study Areas, October 1991, P. 67-68.*

Despite these outstanding natural, cultural, and recreational values, Oil Spring Mountain is under threat from oil and gas development. In BLM's own words:

> Oil Spring Mountain [...] is an undeveloped island surrounded by scattered oil and gas wells, roads, and drill pads. As more development occurs in surrounding lands, the [area] serves as a refuge for native flora and fauna that have been displaced by human activities. [Oil Spring Mountain] provides valuable habitat which supports mule deer, elk, black bear, raptors and other species of wildlife indigenous to western Colorado. There are no other remaining undeveloped areas of similar landform and ecosystems in the oil and gas development belt in this region of Colorado. -*Wilderness Study Report Volume One, Craig District Study Areas, October 1991, P. 67-68*

Oil Spring Mountain is considered to have insignificant potential for oil reserves. However, the area does have moderate to high potential for natural gas development. Approximately 10,030 acres, about 40% of the area, are covered by 16 pre-FLPMA leases. There are three producing wells within the edges of the area, and thirteen dry holes. Oil exploration in the region around Oil Spring Mountain began in 1943, but despite this activity around the mountain, little development has occurred since. At most, Oil Spring Mountain contains only 2.5% of the natural gas reserves present in the immediate vicinity.

Big Ridge CWP (Colorado)

Covered by a patchwork of pinyon-juniper woodlands and semidesert shrublands, Big Ridge rises above an array of attendant hills. A series of drainages dissect the ridge, falling steeply at first, and then winding placidly through flat-bottomed draws of terraced sandstone before joining Douglas Creek. The blended ecosystem host a variety of animal species including mountain lions and coyotes, mule deer, rattlesnakes, golden eagles, blue-gray gnatcatchers, and American kestrels. In spring and early summer, a blush of color spreads through the sageland, as paintbrush, arrowleaf balsamroot, and prickly pear bloom.

In addition to its flora and fauna, the unit contains part of the East Douglas Wild Horse Management Area where a herd of wild horses roam freely. Opportunities for horse viewing and photography are excellent, and the lack of roads within the unit ensures a solitary experience. Hunting, backpacking, and scenic viewing opportunities are also quite good, with the possibility of stumbling across one of the area's many archaeological sites.

Although there are not many intrusions into the proposed wilderness, this unit is partially leased for gas production. The majority of the leases are set to expire within the next three years, and several within the next five years (see attached map).

Canyon Pintado (Colorado)

The Canyon Pintado National Historic District runs north to south in the Douglas Creek valley south of Rangely, and within the boundaries of this MLP. Canyon Pintado is registered on the National Register of Historic Places and provides a link to our past. The "painted canyon" was occupied or visited by ancient civilizations dating back over the past 11,000 years. Canyon Pintado received its name and was first documented in 1776 when Fathers Dominguez and Escalante traveled through the area on their quest to find a route from Santa Fe to the missions in California. The historic district's rich cultural and scenic values and strong cultural tourism interest is represented in the numerous interpretative sites and recreational facilities built by the BLM in the area.

As part of a broader Canyon Pintado/Big Ridge area, conservation groups have nominated the Canyon Pintado area for protection and special designation as a Special Recreation Management Area. Within the Canyon Pintado/Big Ridge SRMA, conservation groups have proposed that the Canyon Pintado zone incorporate a new NSO stipulation. The Canyon Pintado National Historic District's narrow configuration along Douglas Creek lends itself to application of NSO and use of directional drilling (from outside the area).

Important Species

Greater sage-grouse:

Once abundant throughout the west, the greater sage-grouse is threatened by loss of its sagebrush habitat, including loss from oil and gas development, sprawl, human destruction of sagebrush, and invasive weeds like cheat grass. When habitat damage takes place due to one of these activities, sagebrush ecosystems can take 25-100 years to recover. As the sagebrush ecosystem is destroyed, so is the bird's primary source of food and shelter, as well as the setting for its traditional courting ritual. Studies suggest there has been a decrease of 70-90% in overall abundance of the bird, and they are at even greater risk of reduced genetic variation due to this severe population decline.

In March 2010, the greater sage-grouse was placed on the candidate list for ESA protection. This announcement was issued simultaneously with new guidance from BLM for protecting the species from energy development. IM 2010-071 provided a menu of actions BLM can take in priority habitat when evaluating and approving RMPs and energy projects, including withholding or deferring lease parcels and attaching conditions of approval. The guidance affirmed BLM's commitment to conserving greater sage-grouse, a species which has been greatly impacted by oil and gas development. In light of the listing decision and BLM's guidance, the White River MLP should fully protect greater sage-grouse core areas, as mapped by the Colorado Division of Wildlife and Doherty (2008) in Colorado and as mapped by Center for Native Ecosystems and Doherty in Utah.

Graham's penstemon:

The lovely pale lavender flowers of the Graham's penstemon, with their magenta-striped throats and fiery orange staminodes, are found only in northwestern Colorado and Utah's Uinta Basin, growing on oil shale soils. In 2008, the national Endangered Species Coalition released a report titled "Without a Net: Top Ten Wildlife, Fish and Plants Most in Need of Endangered Species Protection", and included Graham's penstemon as an honorable mention. Graham's penstemon was proposed for a Threatened listing under the Endangered Species Act in 2006, and the accompanying proposed Critical Habitat included units in the Vernal Field Office. These designations would have imposed an obligation on the BLM to formally conference with the U.S. Fish and Wildlife Service on potential impacts to this wildflower and/or its proposed critical habitat. However, the Fish and Wildlife Service reversed its position and denied listing later that same year. This decision is currently being challenged in court. Meanwhile, conservation groups have nominated occupied habitat for Graham's penstemon, including proposed critical habitat in the Little Snake and Vernal Field offices for ACEC designation. Oil shale development and oil and gas drilling are the main threats to the penstemon, according to the U.S. Fish and Wildlife Service. Protecting the small amount of acreage with known occurrences of this species from oil and gas development could potentially help assure the long-term persistence of this species, and eliminate the need for protection under the Endangered Species Act.

Raptors:

The area provides important nesting and hunting habitat for several birds of prey, including bald eagle, golden eagle, ferruginous hawk, and prairie falcon. Several of these species are currently experiencing population declines, and oil and gas development and associated infrastructure and disturbance of nest sites and hunting grounds is suspected to a contributing factor. Based on ongoing concerns about these impacts to raptors of all kinds, the U.S. Fish and Wildlife Service has recently issued draft guidelines for managing activities such as oil and gas drilling in raptor habitat. These guidelines are being adhered to

already by the BLM in other resource management decisions in several field offices in Utah and should be considered in the development of management prescriptions for this Master Leasing Plan area.

Other important native species in Eastern Book Cliffs include:

Debris Milkvetch	Utah mountain lilac
Duchesne Milkvetch	Rollins' catseye
Golden Eagle	Northern Leopard frog
Bald eagle	Sage sparrow
Large-flower globemallow	Grey vireo
Narrowstem Gilia	Narrowleaf evening primrose
Piceance Bladderpod	Ferruginous hawk
Piceance twinpod	Ephedra buckwheat

Other important values to be considered in the MLP:
BLM Designated ACECs
Colorado Natural Heritage Program (CNHP) Potential Conservation Areas
Colorado Natural Areas Program (CNAP) Natural Areas
Colorado State Wildlife Areas
Heart of the West Wildlands Network Design Core
Montane Riparian Deciduous and Woodland Forest

Impacts to Values from Leasing:

Oil and gas leasing and development impacts many values in the Eastern Book Cliffs area, especially wilderness-quality lands, species habitat, imperiled plants, and hunting experiences. Impacts to these resources have been realized from past leasing and development, leading to increased conflict in this area as new leasing continues. The potential impacts to species and wilderness values from leasing decisions made in the 2008 Vernal RMP led to the RMP being litigated by conservation groups.

Additionally, the December 2008 Utah lease sale which was predicated on the recently-completed Utah RMPs led to 77 parcels being protested. Those parcels were invalidated by Judge Urbina based on air quality concerns. The Department of Interior initiated a review of the lease sale, establishing a review team of experienced BLM and National Park Service employees. In October 2009, the team released its final report ("Stiles Report").[6] In addition to specifically recommending certain parcels be deferred due to sage-grouse and wilderness characteristics, the Stiles Report noted the lack of national guidance on managing lands with wilderness characteristics and found that this lack of guidance contributes to uninformed oil and gas leasing decisions, and recommended the guidance be issued soon. The report further recommended that "BLM-Utah review the [recently-completed RMPs] in light of this new guidance and make necessary modifications." (pp. 32-33).

Leasing in the Eastern Book Cliffs area has already had lasting impacts on important values, and potential impacts from recent leasing decisions have led to many conflicts over the multiple uses of public lands. Recently, several companies have requested that approved APDs be returned to them,

[6] http://www.doi.gov/documents/BLM_Utah77LeaseParcelReport.pdf.

resulting in the termination of the Gorge Springs unit. Future leasing in this area must proceed in a well thought out manner, in appropriate areas, to reduce conflict and protect natural resources.

MLP Criteria Attainment:
The Eastern Book Cliffs MLP clearly meets three key criteria set out in IM 2010-117 for when preparation of an MLP is required:

- The oil and gas industry has expressed a specific interest in leasing, and there is a moderate or high potential for oil and gas confirmed by the discovery of oil and gas in the general area.
- Additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur where there are:
    - Multiple-use or natural/cultural resource conflicts;
    - Impacts to air quality.
- There is a majority Federal mineral interest.

As discussed previously, there is great demonstrated industry interest and resource potential in the Piceance Basin. However, the area also harbors important habitat for key species and treasured wilderness-quality lands. The White River Field Office is additionally grappling with how to model and manage air quality in light of the increased development scenario.

In summary, the large scale and rapid pace of gas development in the Piceance Basin, along with existing and potential conflicts with wilderness-quality lands, species habitat, and hunting opportunities, establish that Eastern Book Cliffs meets the criteria for preparing an MLP and make this area an ideal candidate.

V. Potential Master Leasing Plan Decision – Opportunity to Solve or Prevent Conflicts

The White River RMP Amendment continues to be delayed while species and air quality impacts are evaluated, the Vernal RMP is in litigation over failing to protect wilderness characteristics, and Utah has a bottleneck of unresolved lease protests, all of which are stalling oil and gas development on public lands. An MLP for this area could resolve these conflicts and allow for leasing and development to move forward in a timely and responsible manner. To solve current conflicts and prevent future ones, the Eastern Book Cliffs MLP must fully protect citizen-proposed wilderness areas, greater sage-grouse habitat, important big game habitat and critical habitat for Graham's penstemon. The MLP should prevent renewal of expired leases in these sensitive areas, such as the Dragon Canyon, Bitter Creek, Oil Spring Mountain, and Big Ridge citizen wilderness proposal, which contain lands that are leased but not developed as depicted on the attached map. In both citizen-proposed wilderness and important species and plant habitat, the MLP should also provide that once leases expire, they will not be reoffered and the lands will be closed to leasing. Leasing and development should proceed in other areas, such as nonessential habitat for big game, raptors, greater sage-grouse, and native planted ranked G3 and higher with appropriate best management practices and stipulations.

Leasing closures and stipulations for greater sage-grouse should be based on the most recent research from the Western Association of Fish and Wildlife Agencies (WAFWA)[7] and Doherty[8]. The Stiles Report

[7] A compilation of studies released by the Western Association of Fish and Wildlife Agencies (WAFWA) in 2004 confirmed that oil and gas development exceeding approximately one well per section (640 acres) results in calculable impacts on Greater Sage-Grouse populations, with negative impacts to leks detectable out to a minimum of 4 miles away. (*Greater Sage-Grouse Conservation Assessment* (Connelly *et al.*, 2004)). The more

recommended that lease parcels in all sage-grouse habitat have NSO stipulations year-round. In light of the ESA listing decision and BLM's guidance, the Eastern Book Cliffs MLP should fully protect greater sage-grouse core areas, as mapped by the Colorado Division of Wildlife in Colorado, and as mapped by Center for Native Ecosystems in Utah.

During the preparation of the MLP, it is vital that no new leases be issued and all applications for permits to drill incorporate new conditions of approval to alert operators to the possibility of new protective stipulations to be incorporated in the ongoing MLP.

VI. Stakeholders

Many local, state, and national sportsmen groups and conservation groups are working to ensure the breakneck pace of gas development in White River doesn't destroy valuable habitat for native species. Local communities depend on jobs and revenues generated by industry, and are also engaged in ensuring their air and water is not polluted by intense development. Additionally, the Colorado Division of Wildlife is an active participant in the White River RMP Amendment to evaluate species impacts.

VII. Appendix

Maps:

1. Surface Ownership
2. Federal Minerals by Surface Ownership*
3. Leases by Years to Expiration
4. Sage Grouse Leks & Brooding Areas

*Utah BLM was not able to provide any map or data of the federal mineral estate in Utah, so this number refers to the Colorado portions of the MLP proposal.

recent recommendations and conservation plan released by WAFWA also confirm the need to identify and protect "core habitat" areas; the signatory agencies, which includes the BLM, committed to "provide for non-renewable resource development and utilization with the assurance of 'no net loss' of sagebrush habitat or Greater Sage-Grouse populations at appropriate spatial and temporal scales" (*Greater Sage-Grouse Comprehensive Conservation Strategy (Striver, et al. 2006, p. 2-10*), as well.

[8] Doherty, K.E. 2008. Sage-grouse and Energy Development: Integrating Science with Conservation Planning to Reduce Impacts, doctoral dissertation, University of Montana, Missoula, Montana