



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
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In Reply Refer To:

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(MT92220.JA)

March 22, 2011

Mr. Peter Aengst  
The Wilderness Society  
503 W Mendenhall  
Bozeman, Montana 59715-3450

Ms. Janelle Holden  
The Wilderness Society  
503 W Mendenhall  
Bozeman, Montana 59715-3450

Dear Mr. Aengst and Ms. Holden:

Thank you for your July 21 and July 26, 2010, letters recommending the Centennial Valley/Beaverhead Headwaters and Bitter Creek/Frenchman Breaks areas for Master Leasing Plan (MLP) analysis.

The Bureau of Land Management's (BLM) Oil and Gas Leasing Reform policy, Washington Office Instruction Memorandum No. 2010-117, issued on May 17, 2010, introduced the MLP concept as a means of carrying out additional planning, analysis, and decision-making for oil and gas leasing and future development. The BLM proposes to conduct MLP analysis in areas based on the criteria as outlined in its Leasing Reform policy. Under this policy, the BLM will take a focused look at likely development, and this analysis may result in changes to resource management plan (RMP) decisions pertaining to post-leasing development. Some MLP analyses will be undertaken independently of any other land use planning efforts, while others will be undertaken as a part of ongoing or upcoming revisions or amendments to RMPs.

Implementation of the policy is expected to make oil and gas leasing more predictable, increase certainty for stakeholders, and restore needed balance to the development process by improving protections for land, water, and wildlife. In addition, the policy will reduce potential conflicts that can lead to costly and time-consuming protests and litigation of leases.

Based on the MLP criteria set forth in the policy, we conducted an extensive assessment of the geographic areas you recommended. The Bitter Creek/Frenchman Breaks geographic area and associated resources are included in the ongoing HiLine Resource Management Planning process. The potential impacts from oil and gas development within the area are being analyzed under the various alternatives in the RMP/Environmental Impact Statement. The area outside of

the Bowdoin gas field has low development potential without a discovery, and the area is being thoroughly analyzed in the ongoing HiLine RMP process. Accordingly, an MLP analysis for that area is not warranted at this time.

Management of the Centennial Valley/Beaverhead Headwaters geographic area is addressed in the Dillon RMP, and analyzed in the associated environmental documents that were completed in 2006. The combination of resource values, unleased Federal oil and gas estate, and oil and gas development potential do not support further consideration or analysis as an MLP area.

In addition to our review of the two areas recommended by external organizations, we identified the Carter geographic area as potentially suitable for MLP analysis. This area is within the boundary of the Miles City planning area for which there is an ongoing planning process. We are planning to incorporate MLP analysis of the Carter area into the ongoing Miles City RMP revision. A map is included of the Carter area for your information. We encourage you to contact our Miles City RMP Project Leader, Mary Bloom, at (406) 233-2852 for further information about the Miles City RMP revision.

This letter does not constitute a proposed amendment or revision to any RMP and is not a decision that is appealable to the Interior Board of Land Appeals. When we propose an amendment or revision to an RMP that incorporates MLP analysis, the proposed amendment or revision is subject to the protest provisions of 43 CFR 1610.5-2.

Thank you for your recommendation and continued interest in oil and gas leasing reform. If you have any questions, please contact Jim Albano at (406) 896-5111 or via email at [james\\_albano@blm.gov](mailto:james_albano@blm.gov).

Sincerely,

/s/ Jamie E. Connell

Jamie E. Connell  
State Director

1 Attachment  
1-Carter Area Map

cc: Barb Cestero  
Greater Yellowstone Coalition  
P.O. Box 1874  
Bozeman, MT 59771-1874

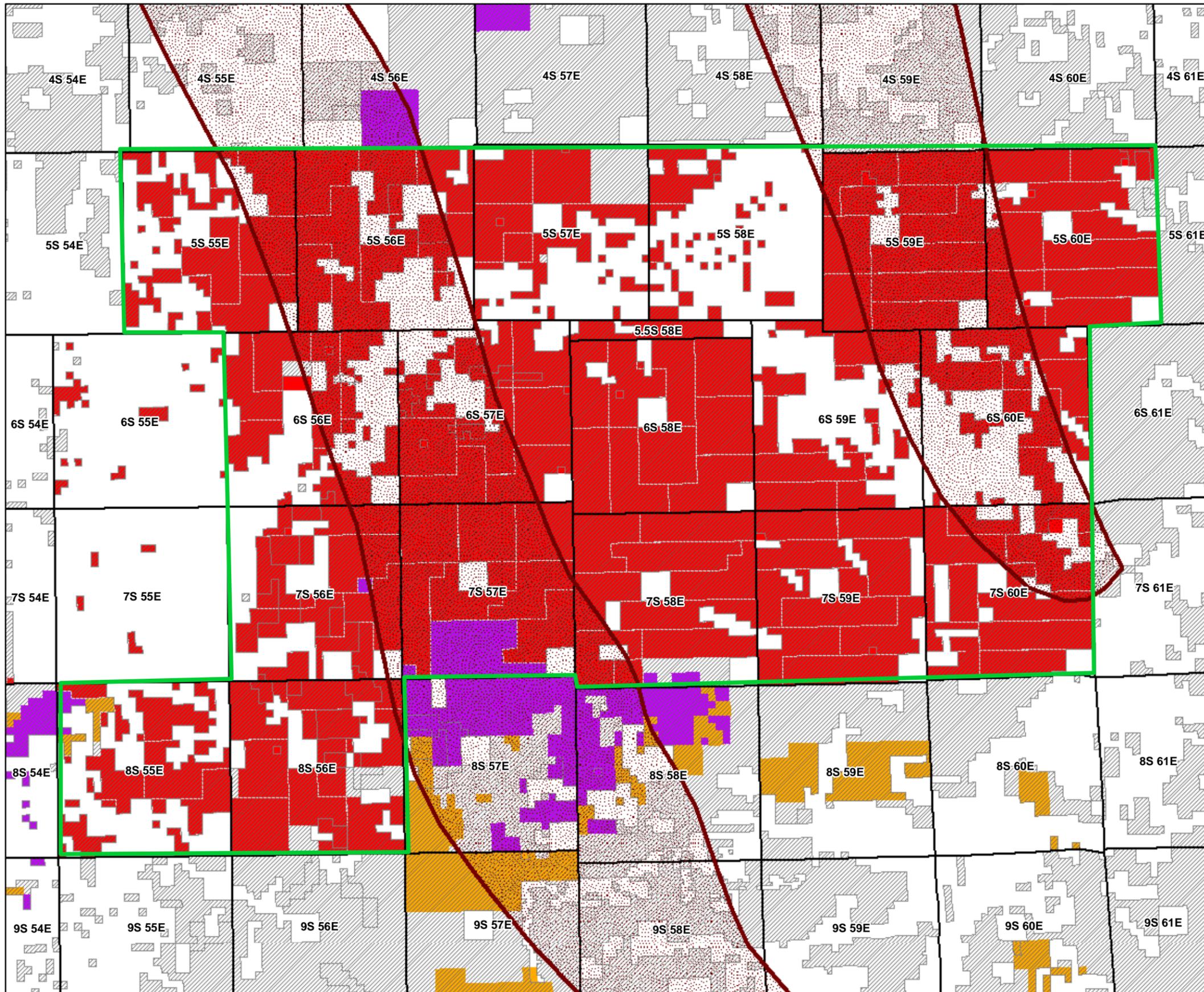
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# Carter

## Location Map



**Legend**

- Carter
- High Dev Potential
- Medium Dev Potential
- Oil/Gas Federal Minerals
- EOIs
- Leased - HBP
- Leased - Nonproducing

