

**Montana Department  
of  
Fish, Wildlife & Parks**



3413 Highway 287  
Sheridan, MT 59749

February 18, 2009

Tim Bozorth  
Bureau of Land Management  
1005 Selway Drive  
Dillon, MT 59725

Dear Tim:

I am writing this letter in reference to the proposed leasing of Oil and Gas Parcels MTM 79010-13, 17, 1N, 1W, 4C, 8G, 8Y, 8Z, OG, P8, PU, PV, SX, UO, UQ, UR, UT, UU, UV, V5, VO, VR, Z8, Z9, ZN, ZZ. I have reviewed the parcels against several fish and wildlife distribution databases and provide our comments below by species of concern. First though, we would like to provide some general comments. All the parcels in or near the Centennial Valley are of such significant importance to sage grouse, primarily, but also to other species, that we recommend removing those parcels from the upcoming lease sale. All these parcels are either within critical distances of leks or are in important nesting/brood rearing habitat. These parcels include: SX, UR, UT, UU, UV, V5, VO, VR, Z8 and Z9.

**Sage Grouse**

As I have mentioned in comments on other proposed leases, Fish, Wildlife and Parks recommends a No Surface Occupancy (NSO) Stipulation within 2 miles and a Timing Limitation Stipulation (March 1 to June 30) out to 4 miles for known sage grouse leks. We make this request only to maintain the probability of leks persisting at full field development. We desire to be proactive with sage grouse and their habitats, particularly given the ongoing USFWS status review. Please refer to the attached table to see those parcels for which we recommend additional stipulations as well as the stipulation number and rationale. All the parcels for which stipulation 11-4 is recommended, fall within 4 miles of some Lima Reservoir, Sweetwater or Basin Creek leks. Though I recognize, as mentioned before, that your agency does not agree on the need for these particular stipulations, they are nonetheless, important ones.

**Big Game**

Again, please refer to the attached table to see those parcels for which we recommend additional stipulations as well as the stipulation number and rationale. Specifically, parcel Z9 does include moose winter range.

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*Ferruginous Hawk*

Lease parcels SX, UR, UV, VO, Z8 AND Z9 have been identified as having ferruginous hawk nests. Consequently, we recommend applying stipulation 13-13.

*Pygmy Rabbits*

Lease parcel 4C has been identified as a breeding area for pygmy rabbits. This species needs to be carefully considered in your stipulations and leasing considerations.

*Gray Wolf*

The gray wolf occurs throughout southwest Montana and was identified in our analysis as a potential concern. At this time, there are no known den sites or critical habitats for this species within the lease boundaries.

The cumulative effects of oil and gas development plus one or more proposed 500KV electrical transmission lines bisecting this area are a major concern for sage grouse habitat in this area. We strongly encourage you to work with the DNRC and energy companies in developing the oil and gas resources in this area in a coordinated fashion with an emphasis on protecting important habitats for native wildlife.

The following general comments would greatly assist in our review of these sales as well as reduce the time and effort required for those reviews. When I received the 40+ lease requests, they were not in any kind of alphanumeric order. Sorting these before you send them next time, would be most helpful. The lease numbering system used on the maps is very cumbersome as they too are not in any alphanumeric order in relation to a compass. Using a different numbering system would greatly facilitate the review process. Finally, we received pages and pages of printed maps with these parcels, none of which were usable as they had almost no useful details on them and they had legends that in most cases, were entirely nondescript. I used our own map provided by our own GIS personnel and could not use the maps provided with the lease requests. All in all, providing materials for the review in the form they were provided is so cumbersome it significantly increases the time required for the review. This really is not acceptable, especially considering the *very* short turn around time provided. The date mailed on all the parcels I reviewed was December 5, 2008. That suggests your office would have had the lease requests shortly after that, meaning it was almost two months before you mailed them to FWP with a request to review them in 15 days. A review may not take as much time as your preparation does. However, certainly a time frame for a review that is more commensurate with the almost two months of preparation your office has, would be more reasonable.

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Thank you for the opportunity to comment on these parcels. If you have any further questions, please feel free to contact me.

Respectfully,

*/s/Robert D. Brannon*

Robert D. Brannon  
Wildlife Biologist

<i>Parcel</i>	<i>Fairly stipulated</i>	<i>Additional Stip needed</i>	<i>Reason for additional stipulation</i>
13 ✓	X	13-6	Sage grouse nest/brood beyond 3 mi. of lek
17 ✓	X	13-6	Sage grouse nest/brood beyond 3 mi. of lek
1N ✓	X	13-6	Sage grouse nest/brood beyond 3 mi. of lek
X 1W	X		Sage grouse nest/brood beyond 3 mi. of lek
4C ✓	X	11-4	Sage grouse lek w/in 4 miles
8G ✓	X	13-6, 11-4	Sage grouse nest/brood beyond 3 mi. of lek; Sage grouse lek w/in 4 miles
8Y ✓	X		
8Z ✓	X		
OG	X		
P8	X		
PU	X		Contact Vanna Boccadori for parcel west of Highway 41
PV	X		
SX ✓	X	13-6	Sage grouse nest/brood beyond 3 mi. of lek
UO	X		
UQ	X		
UR ✓	X	11-4	Sage grouse lek w/in 4 miles
UT ✓	X	13-6, 11-4	Sage grouse nest/brood beyond 3 mi. of lek; Sage grouse lek w/in 4 miles
UU ✓	X	11-4	Sage grouse lek w/in 4 miles
UV ✓	X	13-6, 13-14, 11-4	Sage grouse nest/brood beyond 3 mi. of lek; Sage grouse winter/spring; Sage grouse lek w/in 4 miles
V5 ✓	X	13-6	Sage grouse nest/brood beyond 3 mi. of lek
VO ✓	X	11-4	Sage grouse lek w/in 4 miles
VR ✓	X	11-4	Sage grouse lek w/in 4 miles
Z8 ✓	X	11-4	Sage grouse lek w/in 4 miles
Z9 ✓	X	13-7, 11-4	Moose winter range; Sage grouse lek w/in 4 miles
ZN ✓	X	11-4	Sage grouse lek w/in 4 miles
ZZ ✓	X	11-4	Sage grouse lek w/in 4 miles