

E COMMENT ANALYSIS

Codes for Comment Analysis Table

CODE DESCRIPTION

File Number

NDRMP-L01-01

- NDRMP=North Dakota Resource Management Plan
- L01= Letter number 1, (L=Letter (including faxed letters), E=Electronic Comment (e-mail), F=Feedback form)
- 01=The sequence of numbered comments within a given letter or comment.

Subject Code

AM	Adaptive Management
AQ	Air Quality
CE	Cumulative Effects
CU	Cultural
DC	Document Construct
E	Energy
EA	Energy, Alternative
EC	Energy - coal
EG	Ecological, general
EJ	Environmental Justice
EO	Energy - Oil & gas
ER	Ecological, reclamation
EU	Energy - Uranium
EV	Ecological, vegetation
EW	Ecological, wetlands
FM	Fire Management
FO	Forests, Forest Products
G	General

GR	Grazing
GW	Groundwater
LR	Lands & Realty
MM	Mitigation/monitoring
NC	No Comments
NW	Noxious Weeds
OV	Off Highway Vehicles
P	Paleontological
PA	Public Access
PC	Public Communication
PS	Public Safety
PV	Partnering – Volunteering
R	Recreation
SE	Socio-Economic
SW	Surface Water
VR	Visual Resources
W	Wildlife

Notes

C-1= Comment will be addressed in the RMP

C-2= Other BLM, federal, or state regulation or policy addresses this comment. Many of these are standard procedures or policies that would be developed and applied at the local or site-specific level.

C-3= Out of scope of the RMP

Comment Analysis Table

FILE #	SUBJECT CODE	COMMENTS	NOTES
NDRMP-L1-01	G	The U. S. Bureau of Land Management, North Dakota Field Office (BLM) should develop a broadly-defined Statement of Purpose and Need for Action, allowing multiple use of all public resources on Federal lands for the maximum benefit of the public.	C-1
NDRMP-L1-02	EC	Complimentary and competing uses should be reviewed and evaluated by the BLM. Multiple use of resources in the same areas should be encouraged, at the discretion of the BLM, rather than categorically excluded (e.g., No Surface Occupancy stipulations for other resource uses within coal leases.)	C-1
NDRMP-L1-03	EC	BLM should discuss increasing energy demands, decreasing domestic energy supplies and the strategic necessity for development of mineral resources.	C-1
NDRMP-L1-04	EO	North Dakota oil and natural gas from all sources need to be identified as crucial sources to help offset the deficit between supply and demand.	C-1
NDRMP-L1-05	G	The EIS should clarify that mineral ownership of the United States is a legitimate property right, and the United States has a legal "right" to develop their minerals. The Record of Decision (ROD) should reflect that one of the reasons this NEPA analysis is being conducted is to facilitate the "right" to develop these minerals.	C-3
NDRMP-L1-06	G -EO	BLM should explain in detail that the updated RMP will be a "programmatic" document. BLM should include an explanation of nature and use of "programmatic" documents and disclose that additional site-specific NEPA analyses will have to be conducted for individual Applications for Permit to Drill (APDs), Geographical Area Plans (GAPs), and other resource development and use.	C-1
NDRMP-L1-07	EO	Co-development of different mineral resources in the same geographic area is feasible. Arbitrary restrictions should not be imposed. Development should be evaluated by the BLM on a case-by-case basis.	C-1
NDRMP-L1-08	EO	BLM should address the recoverable oil and gas resource potential and how that potential affects domestic supply and demand.	C-3
NDRMP-L1-09	EO - E	BLM should analyze and define the impact that various stipulations cause on the access to recoverable oil and gas reserves.	C-1
NDRMP-L1-10	SE	BLM should expand its socio-economic analysis to include the impact of stipulations on the human environment such as: affordable energy, school funding, jobs, and tax and royalty revenue.	C-1
NDRMP-L1-11	G	Prior to implementing oil and gas stipulations, BLM should conduct a complete <u>cost/benefit analysis of individual stipulations</u> , conduct a thorough data review on the proposed stipulations, and <u>adopt a monitoring program to track the effectiveness of and continuing need for the stipulations</u> .	C-3

FILE #	SUBJECT CODE	COMMENTS	NOTES
NDRMP-L1-12	EO - EC	BLM should solicit information about the potential for oil and gas development from the operators within the RMP area to assist in the preparation of a realistic, potential, reasonable, foreseeable development to be analyzed in the RMP Amendment.	C-1
NDRMP-L1-13	G	BLM should be aware and fully explain that the new RMP and any associated Conditions of Approval (COA) may significantly affect the rights of operators and mineral lease holders.	C-2
NDRMP-L1-14	AM	BLM should document valid existing mineral lease rights, <u>as protected by statute and regulation</u> , and explain how and when <u>new stipulations can be legitimately applied to existing leases without exceeding (adaptive management) the terms and conditions of existing leases.</u>	C-2
NDRMP-L1-15	EO	BLM should evaluate the wide range of options available for the management, re-use and disposal of produced water and oil and gas production wastes. The ROD and the DEIS should not unnecessarily restrict or limit oil and gas operators to using specific methods or technologies for management of water and wastes. The ROD should allow operators the latitude to propose methods or technologies appropriate for each specific project, and the BLM should evaluate each proposal on its own merits.	C-2
NDRMP-L1-16	EO	BLM should clearly identify potential technical/environmental areas of concern related to oil and gas development and the basis for those concerns in the DEIS. BLM should discuss the need for monitoring and mitigation of these areas of concern.	C-2
NDRMP-L1-17	G	The ROD should allow operators the flexibility to propose monitoring and mitigation methods and/or approaches appropriate for each specific oil and gas project. The BLM should evaluate each proposal on its own merits. Regional and area-wide requirements and stipulations should be kept to a minimum, and be clearly applicable to the individual project.	C-3
NDRMP-L1-18	G	There should be recognition and disclosure in the RMP that changes in oil and gas technology will create the benefit of allowing development and operations to take place with less disturbance and impact than might have been the case historically. Some examples include: horizontal drilling reducing well numbers, electronic flow measurement reducing trips to the well, coiled tubing operations reducing completion time, etc.	C-3
NDRMP-L2-01	A	In RMPs that plan for significant oil and gas development, EPA maintains that air quality dispersion modeling should be conducted to assess the cumulative impacts of projected oil and gas wells on air quality values within and outside of the planning area. The qualitative emission comparison approach, which is commonly used in Environmental Assessments and in some land use planning documents, is not specific enough to adequately address and predict air quality impacts from oil and gas development. While the qualitative emissions comparison approach provides a means to compare the total predicted emissions of each alternative to a baseline year, it does not provide any indication of the potential for	C-1

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		exceedances of ambient air quality standards or the potential for adverse impacts on air quality standards or the potential for adverse impacts on air quality related values (ie. visibility) in nearby Class 1 areas.	
NDRMP-L2-02	AQ	The potential for categorical exclusions under Section 390 of the Energy Policy Act further emphasizes the need for BLM to analyze the air quality impacts and to identify appropriate mitigation measures at the RMP/EIS stage. Section 390 of the Energy Policy Act of 2005 established five statutory categorical exclusions under NEPA including an exclusion for "Drilling an oil and gas well within a developed field for which an approved land use plan or any environmental document prepared pursuant to NEPA analyzed drilling as reasonably foreseeable activity, so long as such plan or document was approved within five years prior to the date of spudding the well." A qualitative emissions comparison approach would not provide BLM with the information necessary to predict potential air quality impacts and identify appropriate mitigation measures.	C-1
NDRMP-L2-03	EW	EPA believes wetlands should be afforded the highest level of protection, either through closing certain lands to leasing or through the use of No Surface Occupancy (NSO) stipulations. We suggest that lease stipulations to protect wetlands be strongly considered. We note that the Record of Decision for Western Unit Basin Oil and Gas Leasing issued by the Unit and Ashley National Forests in 1997 required "No Surface Occupancy" (NSO) as the lease stipulation for riparian lands and wetland areas over 40 acres. For travel management in the planning area, EPA recommends BLM give preference to routes that do not have sensitive soils, stream crossings, critical habitat, meadows, etc.	C-1
NDRMP-L2-04	GW	For oil and gas development on split estate (federal minerals/private surface), protection of groundwater, drinking water, and irrigation waters may be key issues to address. Much of the private surface may be used for farming and ranching; and property owners may be reliant on groundwater and/or surface water for drinking and irrigation. The RMPs/EISs should discuss and analyze potential impacts to water sources on split estate lands from oil and gas development. In addition, the RMPs/EISs should identify all relevant, reasonable mitigation measures to protect these water sources even if they are outside of the jurisdiction of BLM.	C-2
NDRMP-L2-05	CE	In addition to the evaluation and discussion of direct and indirect impacts, the EIS should provide cumulative impacts analyses for impacted resources of concern. The EIS should analyze impacts according to airsheds and watersheds, rather than political boundaries.	C-1
NDRMP-L2-06	EW	Due to the time it can take to adequately reclaim some disturbed wetlands, it is suggested that BLM require mitigation of wetland disturbance during the project operating time, and that mitigation for any particular wetland or riparian area begin concurrent with the disturbance, or even prior to project construction, if possible.	C-2

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NDRMP-L2-07	EW	As studies indicate that traditional mitigation is generally not successful in fully restoring wetland function, it is suggested that the BLM require a minimum of two-to-one mitigation of wetland disturbance,	C-1
NDRMP-L2-08	EW	EPA also suggests that the BLM require complete avoidance of disturbance to any fen wetland (a Category I resource).	C-1
NDRMP-L2-09	EW	The EIS should specify general mitigation requirements, and require any specific projects to generate a wetland mitigation plan.	C-1
NDRMP-L2-10	EW	A mitigation plan should include, but not be limited to: commitments to acquire and start mitigation work prior to project construction; detailed schedules of pipeline and wetland creation/restoration work; detailed construction plans; a detailed mitigation monitoring plan, including a time table; detailed performance criteria to measure success; detailed specifications and commitments for corrective measures to be taken if performance criteria are not met; detailed specifications and commitments to control invasive species; and commitments to the establishment of a protection and management plan in perpetuity (i.e., legal surveys of the specific boundaries with buffers and conservation easements that are given to a land conservancy organization) for all mitigation areas.	C-1
NDRMP-L2-11	EW	We encourage the BLM to require delineation and marking of perennial seeps and springs and wetlands on maps and on the ground before activity development so industry employees will be able to avoid them.	C-2
NDRMP-L2-12	EW	We recommend establishment of wetland and riparian habitat 100-foot buffer zones to avoid adverse impacts to streams, wetlands, and riparian areas.	C-1
NDRMP-L2-13	GW	The EPA recommends the RMPs/EISs include an accurate description of surface and ground water resources, as both are essential to understanding the potential effects of any management alternative. The RMPs/EISs should clearly describe water bodies within the analysis area which may be impacted by resource management activities. Identifying affected watersheds on maps of the various alternatives helps convey their relationship with project activities.	C-1
NDRMP-L2-14	GW	The EIS should analyze potential impacts to surface water, groundwater, and existing and potential drinking water. Impacts to consider include: water quality, quantity, and any adverse change to current water quality of any rivers, streams, and their tributaries.	C-1
NDRMP-L2-15	GW	No Surface Occupancy (NSO) lease stipulations may be appropriate to protect current and potential drinking water sources.	C-1
NDRMP-L2-16	GW	In unleased areas, terms and conditions should be considered to protect non-mineral resources, including NSO lease stipulations as appropriate.	C-1
NDRMP-L2-17	GW	For leased areas, Best Management Practices (BMPs) and mitigation measures should be used to protect these resources and	C-1

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		designed into the alternatives under consideration.	
NDRMP-L2-18	GW	The RMPs/EISs should also disclose the extent to which aquatic habitat could be impaired by potential activities, including effects on surface and subsurface water quality and quantity, aquatic biota, stream structure and channel stability, streambed substrate including seasonal and spawning habitats, stream bank vegetation, and riparian habitats.	C-1
NDRMP-L2-19	GW	Particular attention should be directed at evaluating and disclosing the cumulative effects of increased levels of erosion and sedimentation.	C-1
NDRMP-L2-20	GW	Water quality parameters such as conductivity, dissolved and suspended solids, metals, pH, temperature, dissolved oxygen and physical aquatic habitat parameters may also be important monitoring indicators for determining stream or lake impairment or stress, as well as its sensitivity to further impacts.	C-1
NDRMP-L2-21	GW	Existing water quality standards applicable to the affected water bodies should be presented to provide a basis for determining whether existing uses will be protected and water quality standards met.	C-2
NDRMP-L2-22	AQ	The RMPs/EISs should incorporate an assessment of current air quality conditions. It should use suitable data sets from ambient air monitoring programs with a description of the quality and completeness of the data in terms of location and the period when it was collected.	C-1
NDRMP-L2-23	AQ	While EPA understands broad assumptions are made at the RMP stage, the assessment should include reasonable estimations of full development, including wells, compressors, and other surface facilities, as well as associated transportation activities. It should address all categories of emissions that will occur during the construction and operating phases.	C-1
NDRMP-L2-24	AQ	It should include the cumulative impact of energy-related activities and other reasonably foreseeable energy development and other activities that may affect air quality in the area, including examining anticipated activity trends in the study area, not just already approved "on-the-ground" projects.	C-1
NDRMP-L2-25	AQ	In RMPs/EISs that plan for significant oil and gas development, EPA maintains that air quality dispersion modeling should be conducted to assess the cumulative impacts of projected oil and gas wells on air quality values within and outside of the planning area.	C-1
NDRMP-L2-26	AQ	The analysis should disclose impacts to applicable National Ambient Air Quality Standards (NAAQS) and Prevention of Significant Deterioration (PSD) increments, as well as on air quality-related values in Class I areas.	C-1
NDRMP-L2-27	AQ	Specific pollutants of concern include NO _x , Sulfur Dioxide (SO ₂), and fine particulate contributions to regional haze. Impacts to visibility and potential for regional haze from the range of alternatives need to be estimated.	C-1

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NDRMP-L2-28	AQ	The potential for near-field exceedance of the PM ₁₀ NAAQS also is a concern because of road dust emissions.	C-1
NDRMP-L2-29	AQ	The RMPs/EISs should identify all relevant, reasonable mitigation for air quality impacts, even if they are outside the jurisdiction of BLM. The probability of the mitigation measures being implemented should also be discussed.	C-1
NDRMP-L2-30	EG	The effects of resource management activities on area ecology, including vegetation, wildlife and their habitats, as well as recreational hunting and fishing activities, should be disclosed and evaluated in the RMPs/EISs.	C-1
NDRMP-L2-31	EV	Important vegetative issues include: reclamation activities supportive of pre-existing land uses, including wildlife habitat; noxious weed management; any adverse impacts to BLM State sensitive plants; and/or violation of executive orders concerning invasive species, flood plains, or wetlands and riparian zones.	C-1
NDRMP-L2-32	W	Important wildlife issues include: compliance with BLM, USFWS, or State wildlife management objectives for natural gas mineral developments; wildlife mortality, crucial wildlife habitat; adverse impacts to breeding or nesting activities; and/or any adverse effects to Endangered Species Act listed threatened or endangered species, USFWS listed or proposed species, or BLM State sensitive wildlife or fish species. The RMPs/EISs should include mitigation measures that may be undertaken to minimize or eliminate adverse impacts from the alternatives considered.	C-1
NDRMP-L2-33	NW	However, we encourage prioritization of management techniques that focus on non-chemical treatments first, with reliance on herbicides being the last resort.	C-1
NDRMP-L2-34	NW	The RMPs/EISs should list the noxious weeds and exotic plants that occur in the resource area. In cases where noxious weeds are a threat, EPA recommends the document detail a strategy for prevention, early detection of invasion, and control procedures for each species.	C-1
NDRMP-L2-35	VR	Visual impacts associated with the project's facilities and activities may affect the visual character and scenic resources of an area, including the aesthetic and/or functional quality of recreational experiences. This may include the introduction of impacts out of character with the setting and the visual impact of equipment and crews during construction and operational activities. The severity of these effects depends on a number of factors, including: can the surrounding landscape integrate visual changes without attracting attention; how far from, or visible to, sensitive viewing areas and/or roadways are the activities; how much disturbance will occur; what mitigation efforts are put forth to integrate activities and structures with the area; and/or potential to reclaim disturbed landscapes. The RMP/EIS should evaluate these aspects, and detail mitigation steps that will be taken to minimize associated impacts. Interim and final reclamation work should allow disturbed sites to blend into the natural surroundings, to the extent possible.	C-1

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NDRMP-L2-36	SE	The RMPs/EISs should consider environmental related socio-economic impacts to the local communities such as housing for project workers, schools, burdening existing waste and wastewater handling facilities, and increased road traffic with associated dust and hazardous materials spill potential.	C-1
NDRMP-L2-37	SE	Methods to avoid or minimize such impacts, or if these issues are not a concern for this project, should be discussed. The reasonably foreseeable development evaluation should address the additional loading that could be placed on local communities' abilities to provide necessary public services and amenities, and methods that could potentially avoid or minimize such impacts.	C-1
NDRMP-L2-38	EJ	In accordance with this order, the RMPs/EISs should disclose and evaluate any environmental justice aspects associated with impacts on rural low-income communities by either the proposed project, or the potential build-out for reasonable foreseeable development analysis. If there are no applicable environmental justice considerations, then that should be disclosed.	C-1
NDRMP-L2-39	MM	Oil and gas development, recreational use, grazing, and related activities are among the planning activities requiring management, mitigation, and monitoring. Various impacts can be minimized or potentially eliminated if BMPs and other mitigation measures are properly implemented. Details should be provided for accomplishing these activities in the RMPs/EISs. Also, it is important to specifically designate what entity (e.g. BLM, the proponents, resource organizations, or some combination) will be in charge of which activities, and which will have specific enforceable accountability.	C-1
NDRMP-L2-40	MM	In addition, the BMPs, mitigation measures and related activities require inspection, documentation and record keeping. A "paper" documentation trail must exist to determine what was monitored, inspected, maintained, and completed. All management, mitigation, and monitoring should be verifiable, and an agency/entity needs to be held accountable for performance oversight, throughout the entire project construction and operating life. It may be appropriate for the proponents to fund an account from which 3 rd party contractors can be contracted to perform inspections and monitoring, and/or the implementation of some of the mitigation measures. Please provide details on the issues discussed above in the EIS, preferably in a separate monitoring plan. It may be appropriate to have commitment for those activities placed in the ROD.	C-1
NDRMP-L2-41	OV	The RMPs/EISs should provide a thorough analysis of impacts from OHV use. The analysis should include prevention or mitigation of adverse impacts from OHV's to soils, watersheds, vegetation, wildlife habitat, water quality, cultural resources and other assets of the North and South Dakota management areas.	C-1
NDRMP-L3-01	OV	Off-Highway Vehicles. Unrelated off highway vehicle use continues as a serious threat to biodiversity and a strategy should be addressed to end this practice.	C-1

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NDRMP-L3-02	W	Declining Grassland birds. BLM should identify key parameters and strategies to improve habitat for declining endemic grassland birds, including identification of critical breeding habitat, on BLM lands within the planning area.	C-1
NDRMP-L3-03	W	Monitoring. BLM - in conjunction with North Dakota state wildlife managers, the U.S. Fish and Wildlife Service, and other interested publics - should develop assessment and monitoring programs for all endemic and imperiled species on BLM lands within the planning area, and where needed, establish goals and a timetable for restoring species such as swift fox and black-footed ferrets, which may be absent from BLM lands within the planning area at present.	C-1
NDRMP-L3-04	GW	Special Management Designations. BLM should identify Important Bird Areas and ACECs to protect nationally and locally recognized areas of biological significance, including establishing ACECs around Category 1 prairie dog complexes.	C-1
NDRMP-L3-05	GW	Water. Preservation of water quantity and quality are vital to the long term health of lands in the planning area. Of particular concern are potential degradation of surface waters from coal bed methane development and other potential mining activities, dewatering of ground water aquifers, and erosion caused by unregulated OHV use. BLM should ensure through its planning process that water quality is maintained by its proposed plan.	C-1
NDRMP-L3-06	NW	Vegetation. BLM should continue and financially support its invasive species program.	C-1
NDRMP-L3-07	LR	Lands and Realty. Land consolidation would benefit a number of species where uniform management over large areas is required. Fragmented ownership is an impediment to minimizing conflicts, for example, in areas where large contiguous tracts are needed to support populations of prairie passerines.	C-1
NDRMP-L3-08	OV	Roads. BLM needs to evaluate its road system to determine whether the existing road network is impacting maintenance of wildlife habitat, particularly fragmentation of sage grouse habitat, fragmentation of other grassland bird habitat, big game disturbance, and introduction of noxious weeds.	C-1
NDRMP-L4-01	W	Of Special Interest and concern is the plight of the sage grouse in North Dakota. BLM manages some of the last remaining habitat for this species in the state. The impact to sage grouse populations from oil and gas development is well documented but cattle grazing can also have a negative impact on sage grouse populations by altering the species composition of the sage grouse's habitat. Sage grouse need sage brush with an understory of grasses and forbs for cover. Intensive grazing can eliminate the high-structure vegetation required by the sage grouse.	C-1
NDRMP-L4-02	W	Cattle also distribute exotic plant species; especially cheat grass, which alters the fire cycle which in turn impacts the sage brush and sage grouse. The management emphasis for BLM lands containing sage grouse habitat should be on increasing sage grouse population.	C-1

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NDRMP-L4-03	W	The BLM should also identify additional areas of potential sage grouse habitat and implement a management prescription that will eventually lead to sage grouse being re-introduced into these areas.	C-1
NDRMP-L4-04	VR	A 1/4 mile no-lease, very high scenic integrity level buffer zone should be maintained around Theodore Roosevelt National Park units, and U.S. Forest Service designated Suitable for Wilderness Areas, Non-motorized Backcountry Recreation Areas, Special Interest Areas, Research Natural Areas, and Bighorn Sheep Habitat.	C-3
NDRMP-L4-05	E-O	The mineral estate within this buffer zone should not be leased and existing leases that expire should not be leased again.	C-3
NDRMP-L5-01	EC	I have reviewed portions of the current RMP as they apply to BNI and its current and future mining plans. As I presented in our meeting, BNI's leasing interests in the Center/Stanton area have not materially changed since the last RMP was written. Our leasing interests are completely contained within the Center/Stanton coal study area as shown on Map 2, North Dakota Resource Management Plan Application of Coal Screens, 1988	C-1
NDRMP-L5-02	EC	Map 2 shows several Federal Lease tracts in the Center/Stanton area excluded from leasing consideration due to landowner opposition or alluvial valley floor proximity. None of these areas will affect the plans of BNI. Naturally, BNI will be interested in any changes to the coal screens (suitability for mining) that result from revisiting the 1988 RMP and reserves the right to comment on them.	C-1
NDRMP-L5-03	EC	It should be noted that BNI has completed mining of several Federal Lease tracts in Sections 22, 26 and 34 in T142N, R84W and in Sections 2 and 10, T141N, R84W. BNI has un-mined tracts in Sections 4, 8, and 10, T142N, R84W. Furthermore, BNI recently submitted an application to lease the Federal coal in section 32, T142N, R84W and will probably add the Federal coal in section 20, T142N, R84W to this submittal.	C-1
NDRMP-L5-04	EC	I won't repeat the details in this letter, but as you may recall from our meeting today, BNI is pursuing several opportunities that have the potential to double our current production including a third generating unit at the MRY station. Obviously, that will require a larger mining operation with the potential to mine much more Federal coal. The question was asked, would that expand BNI's lease holdings. The answer is no. The northern portion of our reserve is undedicated and BNI can actively pursue additional customers for this reserve without the appreciable need to expand its lease holdings.	C-1
NDRMP-L5-05	EC	One caveat to the potential expansion of coal mining is the burgeoning wind energy development that began in 2006 in Oliver County. Two projects are up - Oliver Wind I and Oliver County Wind II - both owned and operated by FPL Energy. These projects each produce about 50 MW by wind to 450 MW. These projects are being spurred by legislation that requires power companies to produce 20% (or 25%) of their total electrical generation by renewable sources by the year 2025. In some cases, this will put a	C-1

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		damper on the willingness of a cooperative to invest in coal-fired power plants.	
NDRMP-L6-01	EC	Companies actually conducting lignite coal mining are in the best position to determine which coal is economically recoverable. LEC member mining companies have evaluated these criteria, and recommend the following changes, based on modern mining and reclamation technology, combined with changes in energy economics and current and future market demand: 1. Stripping ration no greater than 10:1 15:1 ; 2. Coal no deeper than 150 250 feet 3. The minimum individual coal seam is at least 2.5 feet thick; and 4. If there are multiple seams (more than one seam), the cumulative total thickness of coal to be mined is at least 10 4 feet thick	C-1
NDRMP-L6-02	EC	Two criteria, number 14 and number 15, have been used in the past to deem certain federal coal tracts as unsuitable for further consideration for leasing. These both address sensitive wildlife habitat. We recommend that the exceptions provided for these criteria be considered general exceptions that are being fulfilled through compliance with surface mining laws and regulations. The history of mining and reclamation in North Dakota over the past 20 years shows that wildlife habitat previously thought lost through mining can be reclaimed to as good, or better, condition than before mining.	C-1
NDRMP-L6-03	EC	For these reasons, federal coal lands with wetlands, riparian areas and sharp-tailed grouse dancing grounds should not be classified as unsuitable for further consideration for coal leasing, requiring an individual tract exception in order to be considered further. Modern reclamation technology, meeting strict reclamation laws and regulations, has demonstrated that individual exceptions do not need to be made. Rather, the federal coal lands in question should generally be considered suitable for leasing, assuming compliance with the requirements to protect fish and wildlife habitat is maintained.	C-1
NDRMP-L7-01	EC	Screen #2 includes, as one of the unsuitability criteria, effects of development of federal coal adjacent to national parks. It appears that none of the areas where leasing is currently being considered is <i>directly</i> adjacent to national parks in North Dakota.	C-1
NDRMP-L7-02	EC	Screen #3 deals with land uses that are locally, regionally or nationally important or unique, again including national parks. This screen includes indirect effects on national park areas. Both the South Heart CSA and Center CSA could have indirect, negative effects on national park units. The Center CSA is within 3 miles of Knife River Indian Villages National Historic Site.	C-1
NDRMP-L7-03	CE	Leasing federal coal in these areas would add to the cumulative effects of heavy energy development and industrial development close to national parks. We are concerned with issues of air and water quality, wildlife habitat, and visitor experience and public perception of these outstanding national park areas.	C-1

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NDRMP-L7-04	CE	I ask you to carefully consider the effects and cumulative effects of federal coal development on these two nationally significant areas of the National Park System and to consider eliminating these areas from consideration for federal coal leasing, or reducing the size of the CSAs to eliminate the possibility of leasing federal coal close to park boundaries or on the direct travel corridors to the national park areas.	C-1
NDRMP-L8-01	EG	Any action concerning coal has to be considered in the context of the ongoing threat of Global Warming. The resulting pollution from continued use of coal as an energy source is the single largest contributor to the rise of the earth's temperature and the consequent negative impacts. Adding more coal into the nation's energy use-stream through additional leasing runs counter to President Bush's recent directive to reduce CO2 emissions. Additionally, lignite, the coal found in North Dakota, is extremely dirty and inefficient and once it is burned contributes disproportionately to Global Warming. North Dakotans overwhelmingly support development of renewable and more efficient alternative fuels.	C-1
NDRMP-L8-02	EA	By leaving North Dakota's coal safely sequestered in the ground and putting our efforts and resources into developing cleaner and more efficient energy sources, the federal government can, and should, be at the forefront of the new energy boom that will provide jobs and at the same time protect the planet.	C-1
NDRMP-L8-03	PS	Coal deposits in much of North Dakota contain uranium and other toxins and heavy metals. The health impacts and the economical impacts to communities by the presence of these elements must be assessed as part of the EIS process. The EIS must then give direction that, on a site specific basis, before considering any lease proposal, the BLM human and natural environment. Further EIS direction should include mandatory development of a comprehensive plan that will protect the public health from any mining operations that result from the leasing action.	C-1
NDRMP-L8-04	W	The development of the federal coal reserves as proposed will have a tremendous negative impact on wildlife habitat and wildlife numbers in North Dakota. With only about 4 percent of its land surface in public ownership the state's wildlife are dependent upon private lands to complete their lifecycles and provide recreational opportunities for North Dakotans. This proposal significantly alters critical habitat and will cause further decline in the population numbers for many grasslands species.	C-1
NDRMP-L8-05	AQ	North Dakota's only national park and number one tourist attraction, Theodore Roosevelt National Park, will also be negatively impacted by the increased coal leasing in western North Dakota. Oil and gas development on its borders, air pollution from coal-fired power plants, and a proposed coal gasification plant at South Heart just 13 miles from its boundary are altering the visitor experience and adversely impacting the flora and fauna of this unique national treasure. By leasing more coal reserves, especially in the South Heart area, the BLM will be contributing to the pressures that threaten TR National Park.	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
NDRMP-L9-01	ER	<u>1. Reclamation.</u> The RMP must consider that it is impossible to fully reclaim lands disturbed by mining to its previous state.	C-1
NDRMP-L9-02	ER	...Believes there are several obstacles to getting land out of final bond release... They are: <ul style="list-style-type: none"> • SMRCA sec 717 states: “The operator of a surface mine shall replace the water supply...”In North Dakota this is a major problem because many of the coal seams are within aquifers that provide water for private and public wells. Coal mining can affect aquifers through contamination, diminution or interruption. 	C-2
NDRMP-L9-03	ER	<ul style="list-style-type: none"> • North Dakota allows de facto bonding, whereby the bond is no longer attached to a specific parcel of land. Performance bonding in ND is now based on a “worst-case scenario” analysis over an entire permit area. The Public Service Commission (PSC) determines the maximum obligation of the state in a case where the state would have to step in and complete reclamation of the company for some reason does not complete the job. There is good financial logic to this approach, but it means that mines in effect get credit against their overall bond without ever having to submit an application or present their reclamation accomplishments for public review. 	C-2
NDRMP-L9-04	ER	<ul style="list-style-type: none"> • Completing final bond release applications require dedication of staff time; yet, it currently offers few, if any, financial rewards to mining companies. Since there is no requirement in the law that mining operators ever apply for final bond release, companies can delay bond release application as long as it suits them, or even permanently. 	C-2
NDRMP-L9-05	ER	Final bond release of reclaimed land should occur simultaneously with ongoing mining operation, not after mines close.	C-2
NDRMP-L9-06	ER	According to NRDC in the Wright EIS comments from August of 2007, “successful reclamation requires both re-establishing vegetation on the surface and replacement and restoration of pre-mining waters. Most agencies-both federal and state-fail to focus on the water protection, replacement and restoration aspects . . . this is particularly important in areas where aquifers may be dewatered.”	C-2
NDRMP-L9-07	CE	The development of the Bakken Shale requires billions of gallons of water for hydraulic fracturing. The oil industry is buying water from municipalities and rural residents. With the excess use of groundwater in aquifers in use for domestic and stock it may become extremely problematic to restore the hydrological balance, further jeopardizing the requirement of SMCRA to replace damaged water supplies.	C-2
NDRMP-L9-08	EG	<u>2. and 3. Global Warming and Air Quality.</u> The RMP must address the greenhouse gas emissions that will occur should leasing and mining commence. This coal use will be associated with a coal gasification plant, according to Great Northern Power Development and although it has stated that 90% of carbon emissions will be sequestered, we have no real information because no mining or air quality permit applications have been filed with the state.	C-1
NDRMP-L9-09	AQ	It is important that CO2 is addressed as it has become a primary	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
		environmental problem for the United States as well as the world. According to the NRDC, “over the past 17 years, atmospheric concentrations of CO2 have risen 30 ppm, a rate of change that , in pre-industrial times, would have taken 1,000 years.” (intergovernmental Panel on Climate Change, Fourth Assessment Report, 2007)	
NDRMP-L9-10	AQ	The RMP must provide information on the amounts of emission that will result from the use of coal produced at any future mine. All sources of CO2 and other emission must be considered. The South Heart area federal coal minerals are extremely close to North Dakota’s only National Park, Theodore Roosevelt National Park. This is a Class I air shed under the Clean Air act and every effort must be made to keep that area free of pollution. Any coal mining or gasification project proposed is only about 13 miles from the border of the park. It is imperative that emissions be considered.	C-1
NDRMP-L9-11	AQ	North Dakota is already in question in regards to its limits on PSD on SO2. In 2001, the EPA found that (SO2) emissions from North Dakota were contributing to air pollution violations in Theodore Roosevelt National Park but it has failed to require the state to take any action to reduce the pollution.	C-1
NDRMP-L9-12	NW	<u>4. Vegetation and Noxious Weeds.</u> The RMP must discuss the role of droughts hindering revegetation efforts should coal mining commence and it must include an analysis of how this problem would be addressed. We have been in a drought phase with low levels of precipitation. This is extremely hard on agricultural lands and disruption of prime agricultural lands will be harder to reclaim to pre-mining conditions when a lack of precipitation obstructs reclamation.	C-1
NDRMP-L9-13	NW	Southwest North Dakota includes the Little Missouri Grasslands and noxious weeds are taking over tracts of land that have been disturbed from oil development and other activities. These weeds must not be allowed to spread into agricultural lands and the RMP must include scientific studies to keep save the integrity of agricultural lands and our National Grasslands.	C-1
NDRMP-L9-14	W	<u>5. Wildlife and Habitat Concerns.</u> We are not certain that there are any sage grouse and leks in the proposed area but recent studies have found serious impacts to sage grouse habitat and such impacts may be contributing to the proposed listing of the sage grouse to the Endangered Species list. Southwest North Dakota has been known to have populations of sage grouse and because of this it is imperative that any RMP completely review the area for sage grouse and if found those acres must be excluded from consideration for leasing. Any coal development would further endanger the sage grouse.	C-1
NDRMP-L9-15	W	There are other wildlife habitat concerns that must be addressed in the RMP. This area is prime habitat for deer, antelope, pheasant and other sport habitat. Healthy populations of all sport species are necessary for tourism and other recreational activities in the area. Southwest North Dakota is famous for hunting of these species and	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
		the integrity of their populations must be kept intact.	
NDRMP-L9-16	SE	<u>6. Social and Economic Impacts.</u> There are undesirable social and economic impacts that are associated with mining and other energy related projects. Any RMP must discuss the cumulative effects of all the proposed industrial development within the project area and it must include details to allow communities to prepare for the impacts of all of the proposed industrial development. These impacts include health care and other social service entities, including but not limited to increased instances of domestic violence, local and county law enforcement, housing and a lack of affordable housing must also be addressed.	C-1
NDRMP-L9-17	SE	The availability of workforce must also be considered. Western North Dakota has literally thousands of jobs that are unable to be filled. This is an issue that needs to be studied in great depth. There is a true lack of people to fill the jobs that are available. How can a new mining and gasification plan expect to fill the jobs that they promise if we can't even fill the jobs that are available today?	C-1
NDRMP-L9-18	SE	An impact to the school systems is also an important issue that needs to be carefully studied. The taxpayers of the area deserve to know the true costs of the addition of a mining industry in the South Heart area. The study must include not only the South Heart school system but the entire surrounding area including but not limited to Belfield, Dickinson, Killdeer, and Richardton-Taylor.	C-1
NDRMP-L9-19	GW	<u>7. Water Impacts.</u> As previously mentioned under the section that addresses reclamation, water is serious business in southwest North Dakota. Mining destroys water resources and those resources cannot be replaced. The hydrological consequences are one of the main reasons that we oppose coal leasing and mining. Many rural residents have only groundwater as their source of fresh water. Those who have connected to the Southwest Water Authority still use groundwater as their main source of water for livestock.	C-1
NDRMP-L9-20	GW	As previously mentioned, once an aquifer has been destroyed it cannot be replaced. The BLM's own document (How does a BLM Resource Management Plan Affect Federal Coal?) states that the BLM is required to "place particular emphasis on protecting air and water quality . . . and sole-source aquifers." We believe that leasing and the ensuing coal mining will destroy the aquifer systems.	C-1
NDRMP-L9-21	GW	The current RMP has found that the South Heart area coal minerals are deemed unsuitable for mining under the criteria required to consider by federal law. Water is still the reason to find this area, once again, unsuitable for mining.	C-1
NDRMP-L9-22	EO	<u>8. Split Estate Situations.</u> Although permission must be granted from a surface owner prior to mining, the law does not require such notification prior to leasing. Our recommendation would be that the BLM notify surface owners in writing: • that <u>mineral resources</u> underlying their property <u>have been nominated</u> for leasing upon nomination, or, at the very least, 60	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
		<p>days in advance of lease sales;</p> <ul style="list-style-type: none"> • whether <u>mineral resources</u> underlying their property have been leased, and if so, by whom • if any of the leased minerals have been assigned to another party, and if so, to whom; • of any <u>proposals from the operator or lessee regarding the lease</u> (such as modifying or waiving stipulations, approving right of way, protest resolutions, etc); 	
NDRMP-L9-23	EC	<p>In the BLM's document (How does a BLM Resource Management Plan Affect Federal Coal?) we do not agree that any surface owner who has given previous written consent to any party to conduct surface mining is deemed to have expressed a preference for mining. We ask that any RMP include the statute that proves that this is actually in the Federal Code.</p>	C-2
NDRMP-L9-24	EC	<p>It is foolish to think that a person who may have supported mining 20 or 30 years ago would still agree with that support. In terms of climate change and protection of our planet anyone who owns property should have the right to oppose leasing and mining. We completely disagree with the BLM's assumption that this is the case.</p>	C-2
NDRMP-L9-25	EC	<p>State and Federal law (SMCRA) states that a landowner must give consent before surface mining can occur on their private property. To make such a bold statement would seem just the opposite of the law written to protect land and water and to regulate the mining industry.</p>	C-2
NDRMP-L9-26	EC	<p>According to SMRCA Sec. 714 (Surface Owner Protection [30 U.S.C 1304]) (a) The provisions of this section shall apply where coal owned by the United States under land the surface rights to which are owned by a surface owner as defined in this section is to be mined by methods other than underground mining techniques. (b) Any coal deposits subject to this section shall be offered for lease pursuant to section 2(a) of the Mineral Lands Leasing Act of 1920, as amended. (c) The Secretary shall not enter into any lease of Federal coal deposits until the surface owner has given written consent to enter and commence surface mining operations and the Secretary has obtained evidence of such consent. Valid written consent given by any surface owner prior to the enactment of this Act shall be deemed sufficient for the purposes of complying with this section.</p> <p>(d) in order to minimize disturbance to surface owners from surface coal mining of Federal coal deposits and to assist in the preparation of comprehensive land-use plans required by section 2(a) of the Mineral Lands Leasing Act of 1920, as amended, the Secretary shall consult with any surface owner whose land is proposed to be included in a leasing tract and shall ask the surface owner to state his preference for or against the offering of the deposit un his land for lease. The Secretary shall, in his discretion but to the maximum extent practicable, refrain from leasing coal deposits for development by methods other than underground mining techniques</p>	C-2

FILE #	SUBJECT CODE	COMMENTS	NOTES
NDRMP-L9-26 (continued)	EC	<p>in those areas where a significant number of surface owners have stated a preference against the offering of the deposits for lease.</p> <p>(e) For the purpose of this section the term “surface owner” means the natural person or persons (or corporation, the majority stock of which is held by a person or persons who meet the other requirements of this section) who --</p> <p>(1) hold legal or equitable title to the land surface;</p> <p>(2) have their principal place of residence on the land; or personally conduct farming or ranching operations upon a farm or ranch unit to be affected by surface coal mining operations; or receive directly a significant portion of their income, if any, from such farming or ranching operations; and</p> <p>(3) have met the conditions of paragraphs (1) and (2) for a period of at least three years prior to the granting of the consent. In computing the three0year period the Secretary may include periods during which title was owned by a relative of such person by blood or marriage during which period such relative would have met the requirements of this subsection.</p> <p>(f) This section shall not apply to Indian lands.</p> <p>(g) Nothing in this section shall be construed as increasing or diminishing any property rights by the United States or by any other landowner.</p> <p>There is nothing to reference that prior consent carries over for a lifetime, as relayed to those who attended the scoping meeting held in Dickinson.</p>	C-2
NDRMP-L9-27	AQ	<p>9. Impacts to tourism and recreation. As previously mentioned, we are concerned about the proximity of this coal leasing area to Theodore Roosevelt National Park. The BLM is required to review the unsuitability criteria that, if leased, would adversely impact units of the National Park System. This proximity to North Dakota’s largest tourist destination would have an absolute adverse affect on this park. Travelers to and from the park and the National Grasslands would experience the unsightly view of a coal mine just before entering the most beautiful area we know.</p>	C-1
NDRMP-L9-28	SW	<p>There are more impacts in the area than just to the Park. The Heart River is the main river that runs into the Patterson Lake Recreation Area. This is the main recreation area in the Dickinson area. Mining near the Heart River that runs into the lake will have a definite negative effect on that area and we ask that adverse effects to it and to Lake Tschida also be examined in the RMP.</p>	C-1
NDRMP-L9-29	SE	<p>As previously mentioned, coal leasing and mining will have a dramatic negative impact on hunting and fishing in our area.</p>	C-1
NDRMP-L9-30	EC	<p>For all the reasons we have listed above, we ask at this time that the South Heart area be once again designated as unsuitable for mining. A complete EIS will find that this unique are meets the criteria outlined in Section 522 of SMRCA.</p> <p>It says: “a surface area may be designated unsuitable for certain types of surface coal mining operations if such operations will -</p> <p>(A) be incompatible with existing State or local land use plans</p>	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
		or programs; or (B) affect fragile or historic lands in which such operations could result in significant damage to important historic, cultural, scientific, and esthetic values and natural systems; or (C) affect renewable resource land in which such operations could result in a substantial loss or reduction of long-range productivity of water supply or of food or fiber products, and such lands to include aquifers and aquifer recharge areas; or (D) affect natural hazard lands in which such operations could substantially endanger life and property, such lands to include areas subject to frequent flooding and areas of unstable geology.”	
NDRMP-E1-01	NC		
NDRMP-E2-01	NC		
NDRMP-E3-01	NC		
NDRMP-E4-01	NC		
NDRMP-E5-01	NC		
NDRMP-E6-01	NC		
NDRMP-F1-01	ER	Concern that reclamation bonds were about to be released without ensuring that water resources are mitigated. This is a concern now but applies to future coal leasing & mining.	C-2
NDRMP-F1-02	W	Stark County resident was interested in development of some specific surface runoff ponds along a major drainage (NW trending wash in Sec. 36). He suggests that a spring in that wash area with the development of a couple small dams will create additional watering areas for cattle and create improved bird habitat.	C-1
NDRMP-F1-03	G	We should look at data coming from range experiments conducted at Schnell Ranch for grazing management decisions. Proper grazing rotation can increase health of grasses.	C-1
NDRMP-F2-01	NC		
NDRMP-F3-01	NC		
NDRMP-F4-01	NC		
NDRMP-F5-01	NC		
NDRMP-F6-01	NC		
NDRMP-F7-01	OV	Unauthorized off road vehicle use is a big problem. BLM should do more policing and enforcement.	C-1
NDRMP-F7-02	OV	BLM should use narrow gates to restrict vehicle use while still allowing access for hikers.	C-3
NDRMP-F8-01	R	Bird brochure for Schnell.	C-1
NDRMP-F9-01	R	Envision creation of a fishing dam easily accessible to the public, handicapped, elderly and children.	C-1
NDRMP-F9-02	R	Currently there is limited fishing opportunities in this area.	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
		Partnership with Game and Fish and other entities to stock the dam would be beneficial for recreational use such as fishing, bird watching, hiking.	
NDRMP-F9-03	SW	An existing flowing natural spring would enhance water quality.	C-1
NDRMP-F9-04	GR	Problems - heavy concentrations of large number of cattle at limited water sources and riparian areas resulting in some destruction of nesting bird habitat.	C-3
NDRMP-F9-05	GR	Possible solution - restoration of washed out dams to provide more accessibility of grazing cattle with added benefits of enhancing wildlife habitat, bird watching and hunting opportunities as well as uniformity of utilization of grazing some grassland areas.	C-3
NDRMP-F10-01	R	Tick control.	C-3
NDRMP-F10-02	GR	Regarding cattle grazing along nature trail - early spring grazing is best to avoid damage to young burr oak trees.	C-3
NDRMP-F10-03	R	Creating a dam in the cattails south of the ponds at the entry to Schnell. This could be easily achieved since existing springs are in the area.	C-3
NDRMP-F10-04	PV	Partner w/area businesses (ethanol plant, wind farms) to enhance community involvement in dam construction. Game & Fish contacted to encourage stocking fish to encourage recreational fishing and greater wildlife habitat.	C-3
NDRMP-F10-05	R	Rebuild a roadway to pond for elderly/handicap accessibility.	C-3
NDRMP-F10-06	R	Build an observation deck on these ponds. Equip with "underwater" type optics to view insect and fish life. Possibly mounting permanent quality binoculars to view birdlife and wildlife.	C-3
NDRMP-F10-07	PV	These enhancements could promote more school groups, scouting groups and the general public to utilize Schnell Recreation Area more and truly enjoy the beauty of this natural resource. Also two washout dams close to "Car Body Dam" could be restored with minimal cost. It would enhance waterfowl usage as well as provide alternative water source for cattle and promote less habitat destruction.	C-3
NDRMP-F11-01	GR	Supports us trying to graze to manage grasses.	C-3
NDRMP-F11-02	R	Talked about importance of Schnell to the Scenic ByWay Project.	C-1
NDRMP-F12-01	NC		
NDRMP-F13-01	NC		
NDRMP-F14-01	NC		
NDRMP-F15-01	NC		
NDRMP-F16-01	NC		
NDRMP-F17-01	PC	Commissioner was interested in BLM providing better information to help the public understand PILT payments.	C-3

FILE #	SUBJECT CODE	COMMENTS	NOTES
NDRMP-F17-02	W- R	Commissioner is interested in some sort of viewing area sage grouse in W. Bowman County.	C-1
NDRMP-F18-01	NC		
NDRMP-F19-01	P	Wants BLM to consider preservation of paleontological sites at Mud Buttes and Rattlesnake Butte. Mud Buttes is an important dinosaur discovery with detail stratigraphic data on timelines near the important K-T boundary.	C-1
NDRMP-F20-01	NC		
NDRMP-F21-01	NC		
NDRMP-F22-01	NC		
NDRMP-F23-01	LR	Some concern about all the small isolated land holdings of BLM and gaining more efficiency and value by exchanges and consolidation.	C-1
NDRMP-F23-02	EO	Concerned about drilling for oil and gas under lands where Bureau of Rec. controlled the surface areas.	C-1
NDRMP-F24-01	NC		
NDRMP-F25-01	NC		
NDRMP-F26-01	NC		
NDRMP-F27-01	NC		
NDRMP-F28-01	NC		
NDRMP-F29-01	AQ	Federal parks - air deterioration in National Parks. (Dunn Co.)	C-1
NDRMP-F30-01	EC	Some companies may propose additional coal areas that were excluded in the last RMP due to public landholder opposition. Coal companies feel that their presence in area and clear record of reclamation and community partnership have changed public opinion.	C-1
NDRMP-F31-01	EO	St. Land Rep. - Split Estate Usage - too much concern put on the fact that surface owner needs to be protected.	C-1
NDRMP-F31-02	R - OV	Maintain Wildlife Habitat and population and make sure public has access.	C-1
NDRMP-F31-03	VR	Has the following concerns about mineral development around TRNP: How it will affect the view shed; Sitting wells; Visibility; Painting infrastructure; Ft. Union; Coal exploration near/on Knife River Indian Village site northeast of Stanton; Coal, renewed interest in the area of Knife River Flint Quarry, Uranium speculation in the Badlands	C-1
NDRMP-F31-04	R	Would like to see more land on which to recreate.	C-1
NDRMP-F31-05	P	Requested that when planning is going on, consider fossil resources.	C-1
NDRMP-F31-06	W - OV	Public land use is important. Sage grouse habitat is in the Big Gumbo Area. They are concerned with Off Road Travel, Travel management, Grazing, Maintain Endangered Species	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
NDRMP-F31-07	VR	Ft. Union is a big concern as far as noise and the view shed.	C-1
NDRMP-F31-08	VR - PV	Stated that they would like to work with BLM in developing Management Practices.	C-1
NDRMP-F31-09	R	Other concerns include the Maah Daah Hey Trail and oil development in that area. Are there areas we need to protect in the future? Look at trail systems.	C-3
NDRMP-F31-10	CU	Concerned about oil exploration around historic sites.	C-1
NDRMP-F31-11	EO	Suggestion was to avoid a RMP that is too rigid. Need to be more flexible w/surface occupancy stipulations. Sometimes No Surface occupancy stipulation on one area may force occupancy on a less desirable area.	C-1
NDRMP-F31-12	R	Suggested that there be more recreation lands for tourism trails and hunting. Keep planning but don't exclude recreation areas.	C-1
NDRMP-F31-13	EA	Wind Interest? There are no proposals for BLM or Forest Service. Stated that the proposal for coal development by South Heart included wind development. Also mentioned that some of the future coal plants plan to put up wind towers to run their plants to conserve energy. Eventually all will have wind power.	C-1
NDRMP-F31-14	AQ	Erionite on Roads - Amidon sampling erionite. Mentioned that this could be a very large emerging issue. Erionite is a naturally occurring fibrous zeolite mineral more damaging to human breathing than asbestos. Some of the rocks used in road grade materials in western North Dakota counties may have high erionite content and thus be an air quality and health issue.	C-1
NDRMP-F32-01	EC	Concern over coal exclusion zones. BLM needs to reconsider criteria for exclusion. Surface attitudes have changed, coal companies have become "good neighbors".	C-1
NDRMP-F32-02	W	BLM should maintain wildlife habitat and closely monitor declining species.	C-1
NDRMP-F32-03	EO - VR	BLM should require environmental friendly (view shed) paint on drilling-production equipment.	C-1
NDRMP-F32-04	EC	Concerned about coal drilling near Stanton that could have a negative impact on Knife River quarries and Indian villages.	C-1
NDRMP-F32-05	R	Would like to see more land developed for recreation uses.	C-1
NDRMP-F32-06	EC	We should take a good look at CO ₂ sequestration. Over next 20 years advances could be dramatic and ND is prime area for its development. See SE Burke pilot proj. EERC Grand Forks. Also look into Coal Bed Methane.	C-1
NDRMP-F32-07	AQ	Erionite on roads in some counties may be large issue for future. Now sampling at Amidon.	C-1
NDRMP-F33-01	NC		
NDRMP-F34-01	EO - VR	Said the group feels oil and gas drilling often comes too close to park boundaries and a suitable buffer to edge of park should be	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
		established in BLM's stipulations.	
NDRMP-F34-02	EO	There is also a common concern about oil and gas drilling too close to Ft. Union Nat. Historic site.	C-1
NDRMP-F34-03	EO	Wants to see less roads for oil and gas, more use of directional drilling, noise abatement.	C-1
NDRMP-F34-04	R	Also BLM should consider temporary rerouting of trail systems when trails are impacted by mineral development.	C-3
NDRMP-F35-01	EO	Seemed to favor continued oil, gas, and coal development in the state.	C-1
NDRMP-F36-01	EO	Will timing be addressed on permitting? Will the RMP address who would approve/permit O & G operations on BLM lands?	C-1
NDRMP-F37-01	EO	Mostly concerned about L-Energy Development as it relates to leasing and development of Federal oil and coal near the three North Dakota national parks.	C-1
NDRMP-F38-01	NC		
Comments Raised at Additional Coal Scoping Meetings			
NDRMP-F39-01	AQ	My kids have asthma & if coal mining starts by Grandpa & Grandma's farm, they will not be able to experience the beauty & the joy of farm life, like they do now, when out visiting their grandparents.	C-1
NDRMP-F39-02	GW	Not to mention, if they start mining. Grandpa's water wells will be destroyed - how is he supposed to water cattle until its proven to be the mines fault & gets replaced?	C-1
NDRMP-F40-01	G	First, I believe that this coal development is too close to a scenic Theodore Roosevelt National Park. Tourism is the second leading industry in North Dakota. The national park will be here for hundreds of years. If we develop coal near the park, the beauty, air quality, and water quality will be jeopardized.	C-1
NDRMP-F40-02	SE	My husband and I are the owners of the horse trail ride business within the park. Our family depends upon the national park tourism.	C-1
NDRMP-F40-03	GW	Second, I am concerned about the loss of wells and springs around the coal mining. We need our wells to water our horses and livestock. Piping in southwest water is not an economic option to us. We need our wells. We need clean water. We do not need chemicals seeping from coal into our water.	C-1
NDRMP-F40-04	EU	We are concerned about uranium.	C-1
NDRMP-F40-05	G	Third, I am concerned about the impacts on roads. Will our quality of life be lost if a coal mine is opened across the road from my house?	C-1
NDRMP-F40-06	G	Do not destroy the national park, the water, and our quality of life.	C-1
NDRMP-F41-01	G	Are roads, air, water, land. All need to be in your thinking.	C-1
NDRMP-F42-01	SE	I don't believe BLM should lease their coal. Leasing of coal could	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
		cause loss of water, poor quality air, destruction of land and which in all would be a reduction in quality of life.	
NDRMP-F42-02	W	Wildlife will be directly effected by leasing.	C-1
NDRMP-F42-03	R	Recreation will be reduced and loss of habitat will be seen.	C-1
NDRMP-F42-04	G	Bond release will also be a major issue that will be dealt with.	C-1
NDRMP-F43-01	GW	The neighbors risk losing their water for any livestock production.	C-2
NDRMP-F43-02	SE	This is all cattle country and agriculture areas and if BLM opens their land it will put us at risk, both health wise and economically loss to your neighboring landowners.	C-1
NDRMP-F43-03	AQ	The health risks from coal mining with uranium and other chemicals plus dust particles put anyone living in the neighborhood downwind at serious health risks.	C-1
NDRMP-F44-01	SE	Will all the development going on right now we need to make sure that our agricultural land stays intact.	C-1
NDRMP-F44-02	AQ/SE	Our quality of life in Southwest North Dakota is beyond compare to any lifestyle in North Dakota. The air is clean and pure - without any emissions, wildlife is in abundance anywhere you look, the neighbors are sincere and united.	C-1
NDRMP-F45-01	GW	A very big concern is the loss of water from the aquifers where mining will take place. Southwest North Dakota has had drought conditions for numerous years and water is very limited.	C-1
NDRMP-F45-02	ER	Reclamation is another concern because putting the land back to its previous conditions never happens and cannot happen	C-1
NDRMP-F46-01	G	Most concerned about - Water & Air	C-1
NDRMP-F47-01	NC		
NDRMP-F48-01	AQ/SE	I am concerned with the leasing of coal in our area for a number of reasons. I am concerned with the health and well being of my family. What kind of pollution will be in the air and water?	C-1
NDRMP-F48-02	SE	The water especially, water is an irreplaceable resource. Also there is the wildlife, where will they all go when the land is taken over?	C-1
NDRMP-F48-03	CU	History is another issue. We live right below "Custer Hill", it is said Custer camped here and there are trenches and dugouts that people come to see. It is very interesting and I want that to be there for the future generations.	C-1
NDRMP-F48-04	SE	My family and I treasure our way of life, the relaxed way of life in the country with the fresh air, clean water, the wildlife, a safe place for our children. I don't want to lose this.	C-1
NDRMP-F49-01	AQ/SE/GW	I am very concerned about several issues. Health, environmental, natural resources like water, clean air, other concerns are quality of life and roadways and traffic.	C-1
NDRMP-F49-02	SW	One water concern includes rivers. Pollution like coal dust can settle in Bull Creek which runs into Heart River, Patterson Lake and Lake	C-1

FILE #	SUBJECT CODE	COMMENTS	NOTES
		Tchida by Glenn Ullin.	
NDRMP-F49-03	EU	Uranium levels in the coal is another concern.	C-1
NDRMP-F50-01	GW	Our water wells would be ruined.	C-1
NDRMP-F50-02	SE/CE	Our farm is beside a farm to market road the traffic would be terrible. it is bad enough with oil traffic	C-1
NDRMP-F50-03	SE	If coal was mined on our land the value of our farmstead and land would drop and everything we worked for would be gone.	C-1
NDRMP-F51-01	AQ/SE	I totally disagree of mining being done in this area due to increase of noise, dust and the change of the environment surrounding the area.	C-1
NDRMP-F51-02	GW	I still have a well that is being used and this could change the course of the water.	C-1
NDRMP-F52-01	NC		
NDRMP-F53-01	NC		