

## **Appendix D – Agency Participation (Stakeholders) Responses**



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Southeast Utah Group  
Arches and Canyonlands National Parks  
Hovenweep and Natural Bridges National Monuments  
2282 S. West Resource Boulevard  
Moab, Utah 84532-3298

L7619 (SEUG-RSS)

July 8, 2013

Memorandum

To: District Manager, Canyon Country District, Bureau of Land Management

From: Superintendent, Southeast Utah Group, National Park Service

Subject: Comments on Preliminary List of Parcels for February 2014 Oil and Gas Lease Sale, Canyon Country District

In reference to the 5/14/2013 memo (3100, LLUT922000) from Deputy State Director, Division of Lands and Minerals, we have reviewed the preliminary list of parcels that is under consideration for the February 2014 oil and gas lease sale in the Canyon Country District. In reviewing the parcel locations, we determined that six separate land areas included on the preliminary list are located within the Moab Master Leasing Plan (MLP) area (see attachment). The MLP process was undertaken to provide additional planning and analysis prior to new leasing of oil, gas, and potash in the MLP planning area. Accordingly, we ask that the sale of these and any other unleased parcels in the Moab MLP area be deferred until completion of the MLP process.

Thank you for the opportunity to review and comment on the preliminary list of parcels. If you have any questions regarding these comments, please contact me at 435-719-2101 or [kate\\_cannon@nps.gov](mailto:kate_cannon@nps.gov).

Attachment

1. Table and map of preliminary February 2014 lease sale parcels that fall within the Moab MLP area.

cc: Deputy State Director, Division of Lands and Minerals, BLM Utah State Office

Attachment

Preliminary February 2014 oil and gas lease sale parcels that fall within the Moab Master Leasing Plan area

Table 1. List of preliminary parcels that fall within the Moab Master Leasing Plan area.

County	Field Office	Township	Range	Section	Parcel ID	Sale ID
Grand	Moab	23S	17E	5	6959	006
San Juan	Monticello	30S	21E	34	7024	071
San Juan	Monticello	30S	21E	33	7024	071
San Juan	Monticello	30S	21E	31	7025	072
San Juan	Monticello	31S	23E	34	7083	130
San Juan	Monticello	31S	23E	26	7083	130

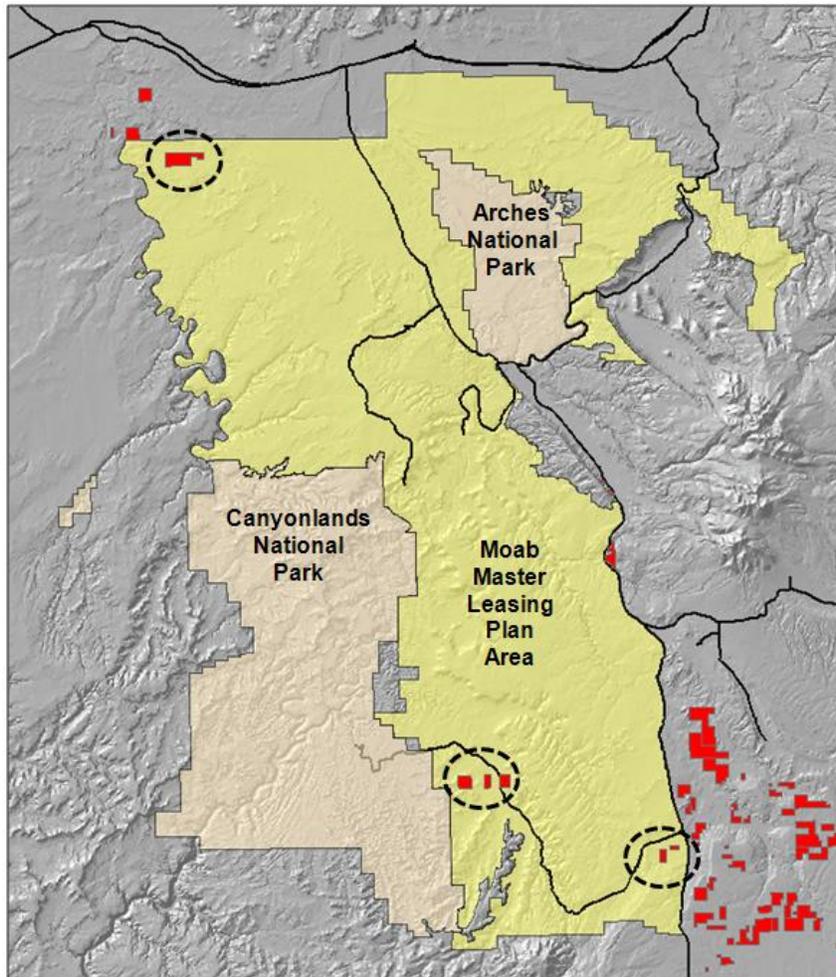


Figure 1. Map showing a subset of the preliminary February 2014 oil and gas lease parcels in relation to Arches and Canyonlands National Parks and the Moab Master Leasing Plan (MLP) area. Dashed black circles indicate those parcels that fall within the MLP area.



IN REPLY REFER TO:

# United States Department of the Interior

NATIONAL PARK SERVICE  
Southeast Utah Group  
Arches and Canyonlands National Parks  
Hovenweep and Natural Bridges National Monuments  
2282 S. West Resource Boulevard  
Moab, Utah 84532-3298

RECEIVED  
MONTICELLO FIELD OFFICE

13 AUG -5 PM 12:21

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BUREAU OF LAND MGMT

L7619 (SEUG-RSS)

August 1, 2013

Memorandum

To: Manager, Canyon Country District, Bureau of Land Management

From: Superintendent, Southeast Utah Group, National Park Service *Kate Cannon 8/1/13*

Subject: Scoping Comments on Canyon Country District February 2014 Oil and Gas Lease Sale, DOI-BLM-UT-Y020-2013-030-EA

Thank you for the opportunity to provide scoping comments on the February 2014 oil and gas lease sale in the Canyon Country District.

Oil and gas exploration and production activities that may result from the sale of lease parcels have the potential to cause direct, indirect, and cumulative effects on air quality and air quality related values (deposition and visibility) that have implications for resource conditions in Arches and Canyonlands National Parks and Hovenweep and Natural Bridges National Monuments. Because ozone concentrations in the region are approaching National Ambient Air Quality Standards, effects of oil and gas activities on ozone formation are of particular concern. Consistent with the Interagency Memorandum of Understanding concerning air quality analyses and mitigation for federal oil and gas decisions, we ask that BLM consult with the NPS Air Resources Division and other members of the Utah air resources technical advisory group in determining the most appropriate type of air quality analyses to conduct for the proposed lease sale. In addition, we ask that BLM include a lease notice informing potential lessees that additional air quality mitigation measures may be imposed prior to granting permits to drill, pending the outcome of future regional modeling studies and/or other analyses.

We also are concerned about the proliferation of pads and roads associated with potential future exploration and production activities enabled by the proposed lease sale. Construction of well pads and increases in vehicular traffic may result in increased emissions of fugitive dust from unpaved pads and roads. Dust emissions have the potential to impact air quality and air quality related values such as visibility. Cumulatively, dust emissions also have the potential to influence streamflow and other hydrologic processes through downwind effects on mountain snow cover. Although the parcels to be included in this lease sale are relatively distant from NPS units, we nevertheless are concerned about potential impacts to visual resources, especially including scenic views and dark night skies seen from Canyonlands, Arches, and Hovenweep. We ask that BLM address these issues in the Environmental Assessment and identify appropriate lease stipulations to mitigate potential impacts.

If you have any questions regarding these scoping comments, please contact me at 435-719-2101 or [kate\\_cannon@nps.gov](mailto:kate_cannon@nps.gov).

cc: Superintendent, Hovenweep and Natural Bridges National Monuments



**United States Department of the Interior**

BUREAU OF INDIAN AFFAIRS  
Navajo Region Office  
Division of Real Estate Services  
P. O. Box 1060  
Gallup, New Mexico 87305-1060

RECEIVED  
MONTICELLO FIELD OFFICE  
13 JUL 23 AM 10:58  
DEPT OF THE INTERIOR  
BUREAU OF LAND MGMT

IN REPLY REFER TO:  
Leases/Permits(Minerals) N425

JUL 12 2013

**Certified Mail – Return Receipt Requested**

Honorable Ben Shelly

President, The Navajo Nation

Attention: Division of Natural Resources, Navajo Land Department

Dear President Shelly:

Enclosed for your information and necessary action is a copy of a letter dated June 14, 2013, from the Bureau of Land Management, Utah State Office concerning a future competitive oil and gas lease sale. The tracts are spilt estate involving Navajo Tribal trust lands as follows:

**UT0-214 – 7109- 156**

Township 39 South, Range 23 East, SLM, San Juan County, Utah  
Section 22: ALL  
Section 23: N $\frac{1}{2}$ , SW $\frac{1}{4}$ , N $\frac{1}{2}$ SE $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$   
Section 24: ALL  
Containing 1,880.00 acres

**UT0-214 – 7110 – 157**

Township 39 South, Range 23 East, SLM, San Juan County, Utah  
Sections 25, 26 and 27: ALL  
Section 35: E $\frac{1}{2}$   
Containing 2,240.00 acres

**UT0-214 – 7112 – 159**

Township 40 South, Range 23 East, SLM, San Juan County, Utah  
Section 1: N $\frac{1}{2}$ , SE $\frac{1}{4}$   
Containing 480.00 acres

The Bureau of Land Management is requesting comments and any potential concerns, conflicts or any special stipulations that may apply. Your response is requested on or before July 26, 2013. If your response is not received by that date, we will proceed to apply the standard stipulations developed by the Navajo Nation and Bureau of Indian Affairs dated March 23, 1990.

By a copy of this letter, we are notifying the Monticello Field Office, Bureau of Land Management, Utah State Office, that our office forwarded the request to the Navajo Nation for comments and/or any special stipulations that may apply.

If you have any questions contact Ms. Bertha Spencer, Supervisory Realty Specialist, Leases/Permits (Minerals) section at 505/863-8336.

Sincerely,

*/S/ TIMOTHY D. DEASIS*

Acting Regional Director, Navajo

Enclosure

cc: Monticello Field Office, BLM, 365 North Main St., Monticello, Utah 84535  
Navajo Nation, Minerals Department, P.O. Box 1910, Window Rock, AZ 86515

## List of Lands

### **UT0214 - 7109 – 156**

T. 39 S., R. 23 E., Salt Lake

Sec. 22: All;

Sec. 23: N2, SW, N2SE, SWSE;

Sec. 24: All.

1,880.00 Acres

San Juan County, Utah

Monticello Field Office

### **UT0214 - 7110 – 157**

T. 39 S., R. 23 E., Salt Lake

Secs. 25, 26 and 27: All;

Sec. 35: E2.

2,240.00 Acres

San Juan County, Utah

Monticello Field Office

### **UT0214 - 7112 – 159**

T. 40 S., R. 23 E., Salt Lake

Sec. 1: N2, SE.

480.00 Acres

San Juan County, Utah

Monticello Field Office



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

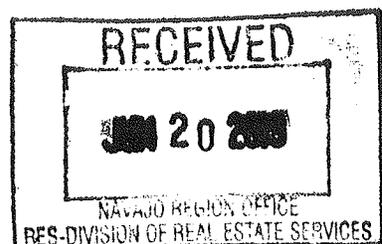
Utah State Office  
440 West 200 South, Suite 500  
Salt Lake City, UT 84101  
<http://www.blm.gov/ut/st/en.html>



*RA 6/20/13  
to  
Beth S.*

IN REPLY REFER TO:  
3100  
LLUT922000

**JUN 14 2013**



Ryan Hunter  
Navajo Region Realty Officer  
Bureau of Indian Affairs-Navajo Regional Office  
P. O. Box 1060, M/C N420  
301 W. Hill Ave., Suite 301  
Gallup, New Mexico 87301

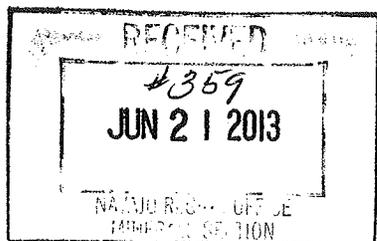
Re: February 2014 Competitive Oil and Gas Lease Sale

Dear Mr. Hunter:

The enclosed list of lands with Indian surface and Federal minerals can be offered at a future competitive oil and gas lease sale with your concurrence. Please review the enclosed list of lands for any potential concerns or conflicts. Any concerns your office may have on the list of lands included in the preliminary listing should be directed to the Monticello Field Office, Bureau of Land Management (BLM), 365 North Main Street, Monticello, Utah 84535 (with a copy to this office) no later than August 1, 2013, in order for the BLM to address your concerns prior to making a leasing recommendation.

If you are interested in attending a site visit, please contact Cliff Giffen at (435) 587-1524 or [cgiffen@blm.gov](mailto:cgiffen@blm.gov), within two weeks of the date of this letter.

Please provide this office with the appropriate stipulations that will be made part of a lease when issued. If you have any questions, please contact Justin Abernathy of this office at (801) 539-4067.



Sincerely,

Michael Stiewig  
Acting Deputy State Director,  
Division of Lands & Minerals

Enclosure:

1. List of Lands

# San Juan County



sanjuancounty.org

RECEIVED  
MONTICELLO FIELD OFFICE  
13 AUG '13 AM 10:33  
DEPT. OF THE INTERIOR  
BUREAU OF LAND MGMT

## SAN JUAN COUNTY COMMISSION

Bruce B. Adams - Chairman  
Kenneth Maryboy - Vice-Chairman  
Phil Lyman - Commissioner  
Rick M. Bailey - Administrator

August 5, 2013

Don Hoffheins, Field Manager  
Bureau of Land Management  
P.O. Box 7  
Monticello, UT 84535

ATTN: Cliff Giffen

RE: February 2014 Oil and Gas Lease Sale

Dear Don:

We have reviewed the proposed parcel list for the subject oil and gas lease sale and offer the following comments.

As we have noted in our comments on previous lease sales, we are concerned with the number of parcels which are deferred from the proposed list of parcels to be offered for sale. In this particular sale approximately 59 parcels or parts of parcels totaling roughly 76,680 acres have been deferred in San Juan County. This deferred acreage is approximately 63% of the total acreage in the initial listing. We understand that your rationale for deferral was based on potential high cultural site density in many of the parcels and Gunnison sage-grouse habitat in some of the other parcels. We are aware that your capacity to process parcels is limited by staff capability. However, we are very concerned that continual deferral of parcels will result in a backlog that will take years to process.

San Juan County is heavily dependent upon centrally assessed properties to provide the services needed by its residents. Oil and gas facilities are a major source of tax revenue from centrally assessed properties. The County also receives revenue from oil and gas lease sales which is the first step toward potential revenues from mineral exploration and production. If leases aren't sold, the County has no opportunity to collect revenue.

We fully support the lease of those 53 parcels remaining on the potential parcel list in accordance with leasing stipulations from the Moab and Monticello Resource Management Plans. We appreciate this opportunity to comment and look forward to a successful lease sale.

Sincerely,

Bruce B. Adams  
Commission Chairman

cc: Moab District Manager  
Utah State Director



State of Utah

GARY R. HERBERT  
*Governor*

GREG BELL  
*Lieutenant Governor*

Office of the Governor  
PUBLIC LANDS POLICY COORDINATION OFFICE

KATHLEEN CLARKE  
*Director*

August 21, 2013

Clifford Giffen  
Natural Resource Specialist  
Bureau of Land Management Monticello FO  
365 North Main  
Monticello, UT 84525

Subject: Canyon Country District February 2014 Oil and Gas Lease Sale  
DOI-BLM-UT-Y020-2013-030-EA  
RDCC Project No. 39420

Dear Mr. Giffen:

The State of Utah supports the BLM's proposed February 2014 Oil and Gas Lease Sale in the Canyon Country District. The proposal promotes the exploration and development of oil and natural gas resources in Utah. The Utah Division of Wildlife Resources (UDWR) has submitted the following comments the State of Utah would like addressed:

Sale ID 002- This area is year-long crucial habitat for pronghorn. UDWR recommends no construction, drilling, or completion activities during parturition (Apr. 15 to June 15). There is a known golden eagle nest within 0.5 miles of the proposed parcel. UDWR recommends raptor surveys if work is to be done during raptor courtship, nesting, and/or fledging (use USFWS dates and spatial buffers for individual raptor species).

Sale ID 003- This area is year-long crucial habitat for pronghorn. UDWR recommends no construction, drilling, or completion activities during parturition (Apr. 15 to June 15). There is a known red-tailed hawk nest within 0.5 miles of the proposed parcel. UDWR recommends raptor surveys if work is to be done during raptor courtship, nesting, and/or fledging (use USFWS dates and spatial buffers for individual raptor species).

Sale ID 006- This area is year-long crucial habitat for pronghorn. UDWR recommends

Sale ID 006- This area is year-long crucial habitat for pronghorn. UDWR recommends no construction, drilling, or completion activities during parturition (Apr. 15 to June 15). There is a known raptor nest within 0.5 miles of the proposed parcel. UDWR recommends raptor surveys if work is to be done during raptor courtship, nesting, and/or fledging (use USFWS dates and spatial buffers for individual raptor species).

Sale ID 053- This area includes crucial summer habitat for both mule deer and elk. UDWR recommends a seasonal closure for fawning/calving activity from May 15 - July 15. The lease parcel also includes crucial winter habitat for elk; UDWR recommends a seasonal closure from Dec. 1 – April 15.

Sale ID 054- This area is crucial summer habitat for both mule deer and elk. UDWR recommends a seasonal closure for fawning/calving activity from May 15 - July 15.

Sale ID 083- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 071- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 096- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 100- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 102- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 107- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 108- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 110- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 111- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 115- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 117- This area is crucial summer habitat for elk. UDWR recommends a seasonal closure for elk calving activity, from May 15 - July 15.

Sale ID 128- This area is year-long crucial fawning habitat for pronghorn. UDWR recommends no construction, drilling, or completion activities during parturition (Apr. 15 to June 15).

Sale ID 130- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15. This area is also year-long crucial fawning habitat for pronghorn. UDWR recommends no construction, drilling, or completion activities during pronghorn parturition (Apr. 15 to June 15). Burrowing owls occur within 0.5 miles of the proposed parcel. UDWR recommends no construction, drilling, or completion activities from Apr. 1 to July 15.

Sale ID 132- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 135- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 136- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 137- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 138- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 139- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 140- This area contains crucial winter habitat for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 141- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 142- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 143- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 144- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 145- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 146- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 147- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 148- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 150- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 164- This area is crucial summer habitat for mule deer fawning. UDWR recommends no construction, drilling, or completion activities during parturition (May 15 to July 5). Mapped Greater Sage-grouse habitat occurs in this parcel. This area occurs outside of the sage-grouse management areas identified within the *Conservation Plan for Greater Sage-grouse in Utah*.

Sale ID 165- This area is crucial summer habitat for mule deer fawning. UDWR recommends no construction, drilling, or completion activities during parturition (May 15 to July 5).

Sale ID 174- This area is year-long crucial fawning habitat for pronghorn. UDWR recommends no construction, drilling, or completion activities during parturition (Apr. 15 to June 15). Burrowing owls are known to occur within 0.5 miles of the proposed parcel. UDWR recommends no construction, drilling, or completion activities from Apr. 1 to July 15.

Sale ID 176- There is a known golden eagle nest within 0.5 miles of the proposed parcel. UDWR recommends raptor surveys if work is to be done during raptor courtship, nesting and/or fledging (use USFWS dates and spatial buffers for individual raptor species).

Sale ID 179- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 182- This area is year-long crucial habitat for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 183- This area is within Gunnison sage-grouse wintering and brood-rearing habitat and within 2 miles of a mapped Gunnison sage-grouse lek. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15.

Sale ID 184- This area is within Gunnison sage-grouse wintering and brood-rearing habitat and within 2 miles of a mapped Gunnison sage-grouse lek. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 185- This area is within Gunnison sage-grouse wintering and brood-rearing habitat and is within 2 miles of a mapped Gunnison sage-grouse lek. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15.

Sale ID 186- This area is within Gunnison sage-grouse brood-rearing habitat. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15.

Sale ID 187- This area is within Gunnison sage-grouse wintering and brood-rearing habitat. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 188- This area is within Gunnison sage-grouse wintering and brood-rearing habitat and is within 2 miles of a mapped Gunnison sage-grouse lek. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15.

Sale ID 189- This area is within Gunnison sage-grouse brood-rearing habitat. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 191- This area is within Gunnison sage-grouse winter and brood-rearing habitat and is within 2 miles of a mapped Gunnison sage-grouse lek. UDWR recommends no construction, drilling or completion activities from Mar. 1 to June 15.

Sale ID 194- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 195- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 196- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 197- This area is crucial winter range for elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 199- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 200- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 201- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 202- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 203- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 204- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 205- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 206- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 207- This area is within Gunnison sage-grouse brood-rearing habitat. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 208- This area is within Gunnison sage-grouse winter and brood-rearing habitat and is within 2 miles of a mapped Gunnison sage-grouse lek. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 209- This area is within Gunnison sage-grouse brood-rearing habitat. UDWR recommends no construction, drilling or completion activities from Mar. 1 to June 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling or completion activities from Dec. 1 to Apr. 15.

Sale ID 210- This area is within Gunnison sage-grouse brood-rearing habitat. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15.

This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 211- This area is within Gunnison sage-grouse brood-rearing habitat. UDWR recommends no construction, drilling, or completion activities from Mar. 1 to June 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 212- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 213- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 215- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 216- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 217- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 218- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 219- This area is winter habitat for Gunnison sage-grouse. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 220- This area is winter habitat for Gunnison sage-grouse UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 221- This area is winter habitat for Gunnison sage-grouse UDWR recommends no construction, drilling, or completion activities from Dec.1 to Apr. 15. This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 222- This area is crucial winter range for mule deer and elk. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Clifford Giffen  
August 14, 2013  
Page 8

Sale ID 223- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

Sale ID 224- This area is crucial winter range for mule deer. UDWR recommends no construction, drilling, or completion activities from Dec. 1 to Apr. 15.

The State of Utah appreciates the opportunity to review this proposed oil and gas lease sale, and we look forward to working with you on future projects. Please direct any other written questions regarding this correspondence to the Public Lands Policy Coordination Office at the address below, or call Cindy Smith at (801) 537-9193.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Clarke', is written over a circular stamp or seal. The signature is fluid and cursive.

Kathleen Clarke  
Director

## **Appendix E – Public Participation**

**AFFIDAVIT OF PUBLICATION**

**Public notice**

**BLM SEEKS PUBLIC COMMENT  
ON FEBRUARY 2014  
OIL AND GAS LEASE SALE**

The Bureau of Land Management Canyon country District is seeking public comments to identify issues to be analyzed in an environmental assessment for the February 2014 oil and gas lease sale.

Public scoping for the oil and gas lease sale begins with the publication of this notice and will continue until August 9, 2013. Comments will be used to develop issues and alternatives to be analyzed in an environmental assessment. Comments can be submitted by email to: [blm\\_ut\\_mt\\_og\\_leasing\\_comments@blm.gov](mailto:blm_ut_mt_og_leasing_comments@blm.gov). Send written comments to the BLM Monticello Field Office, at the address noted below. The lease sale parcel list and maps are available for review at:

Bureau of Land Management  
Monticello Field Office  
365 North Main  
Monticello, UT 84535  
Phone: (435) 587-1500  
Office Hours: 7:45 a.m. to 4:30 p.m.

or

Bureau of Land Management  
Moab Field Office  
82 East Dogwood  
Moab, UT 84532  
Phone: (435) 259-2100  
Office Hours: 7:45 a.m. to 4:30 p.m.

The lease sale parcel list and maps are also be viewed at: <http://www.blm.gov/ut/st/en/fo/monticello.html>

Published July 17, 2013 in the *San Juan Record*, Monticello, Utah.

I, William Webster Boyle, being duly sworn, depose and say that I am the publisher of **The San Juan Record**, a weekly newspaper of general circulation published at Monticello, Utah every Wednesday; that Notice of BLM seeks public comment, a copy of which is hereunto attached, was published in the regular and entire issue of each number of said newspapers for one issue, July 17, 2013. Said notice was also published on [Utahlegals.com](http://Utahlegals.com) through the same timeframe.

Bill Boyle  
Bill Boyle, Publisher

Subscribed and sworn to before me this 17 day of July  
A.D. 2013.

Jill C. Slack  
Notary Public residing at Monticello, Utah  
My commission expires February 7, 2015



Representative  
shed in The Times-Inde-  
pe. Moab, Utah July 4, 11,  
and 18, 2013.

## BLM SEEKS PUBLIC COMMENT ON FEBRUARY 2014 OIL AND GAS LEASE SALE

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or

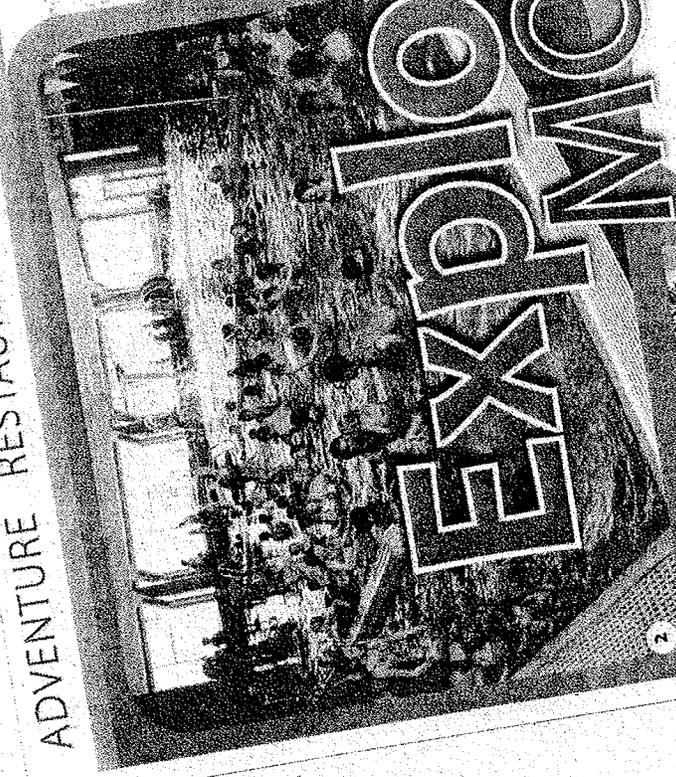
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Published in The Times-In-  
dependent, Moab, Utah July 18,  
2013.

> hike bike jeep  
float fly ride see  
swim shop stay

ADVENTURE RESTAURANTS GALLERIES NIGHTLIFE



EXPLORE  
MOAB

U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

Environmental Notification Bulletin Board

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ENVIRONMENTAL NOTIFICATION BULLETIN BOARD

**Project Name:** Canyon Country District February 2014 Oil and Gas Lease Sale  
**NEPA Log Number:** DOI-BLM-UT-Y020-2013-030-EA  
**Field Office/Code:** Monticello Field Office  
**Contact:** Clifford Giffen  
**Phone Number:** 435-587-1524  
**File/Serial Number:** 3100

**Document Type:** Environmental Assessment

**Primary Program:** Cultural:  Watershed:   
Fire / Fuel:  Wild Horses:   
Lands & Realty:  Wildlife:   
Minerals:  Planning:   
Range:  Paleontology:   
Recreation:  Woodland / Forestry:   
Vegetation:  Other:

**Project Description:** The Bureau of Land Management (BLM) is preparing this environmental assessment (EA) to disclose and analyze the environmental consequences of the sale of 53 parcels, approximately 45,300 acres, during the February 2014 competitive oil and gas lease sale and subsequent lease issuance to successful bidders. A public scoping period for the proposed action will run until August 9, 2013. The purpose of the public scoping process is to determine relevant issues that should be addressed and analyzed in the EA. The proposed parcel list is available for review at both the Monticello Field Office and the Moab Field Office (see addresses below) and online at: <http://www.blm.gov/ut/st/en/fo/monticello.html>. Written comments may be mailed or emailed to: Monticello Field Office Attn: Cliff Giffen 365 North Main Monticello, UT 84535 OR Moab Field Office Attn: Cliff Giffen 82 East Dogwood Moab, UT 84532 Email: [blm\\_ut\\_mt\\_og\\_leasing\\_comments@blm.gov](mailto:blm_ut_mt_og_leasing_comments@blm.gov) Comments must be received no later than August 9, 2013.

**Legal Description:** Meridian: Salt Lake  
Township:  
Range:  
Section:

**General Location:** Parcels are within both the Moab and Monticello Field Offices, Canyon Country District.

**County(s):** Grand **Other:**  
San Juan

**Special Interests:** ACEC:  Special Status Species:   
Crucial Habitat:  Visual Resources:   
Cultural:  Designated Wilderness / WSA:   
Fire Rehabilitation:  Wild & Scenic Rivers:   
Riparian:  Areas with Wilderness Characteristics:   
None:  Native American Concerns:   
Other:  BLM Natural Areas

**Other Remarks:**

**Status and Date of Action:** 2013.07.15 Public Scoping Period provided. Comments due August 9, 2013.

**Project Modified Dates:** 07/15/2013 16:44:49  
07/15/2013 16:42:41  
07/15/2013 16:41:26

**Comment Period Provided:** No

**Files:** [2013.07.11\\_Feb\\_2014\\_OG\\_Lease\\_Sale.pdf](#)

**To Comment, Click here:** [Add a Comment Here](#)

INTERNAL USE ONLY

Have external organizations (government, advocacy, etc.) expressed interest in the action, or is no it anticipated they will express interest?

If so, who:



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

Utah State Office

440 West 200 South, Suite 500

Salt Lake City, UT 84101

<http://www.blm.gov/ut/st/en.html>

IN REPLY REFER TO:

3120

LLUT922000

July 22, 2013

Joseph J. Adams  
c/o Mike Adams, Agent  
411 Spanish Peaks Drive  
Missoula, Montana 59803-2426

Dear Mr. Adams:

It is our understanding that you are the surface owner of all or a portion of the lands located in Lots 3 and 4, NESW of Section 19, Township 32 South, Range 24 East, SLM, San Juan County, in our competitive oil and gas lease sale scheduled for February 18, 2014. The lands are designated as parcel no. UT0214-183. This parcel is being considered for leasing in response to an Expression of Interest received by the Bureau of Land Management (BLM).

As a result of oil & gas leasing reform measures and new lease review processes the BLM has made changes to the leasing process with new coordination efforts with private land owners. The new process includes a site visit for each parcel on the preliminary lease sale list.

Representatives from the BLM, and possibly other interested agencies, may wish to conduct an on-site visit to the parcel described above. If you have any concerns, please contact Clifford Giffen at (435) 587-1524 or [cgiffen@blm.gov](mailto:cgiffen@blm.gov) before August 9, 2013. This is a preliminary list only. The site visit is another way to gather information so that we can make an informed leasing decision. You will receive subsequent notification if this land is included on the February 2014 Oil and Gas Lease List when the Environmental Assessment (EA) is posted for public comment.

If you have any questions concerning the lease process, please contact Justin Abernathy at (801) 539-4067.

Sincerely,

*/s/ Roger L. Bankert*

Roger L. Bankert  
Chief, Branch of Minerals

cc: BLM Field Office Manager – Monticello (UTY02)

bcc: Feb 2014 Sale Book  
UT-920 Reading File  
UT-950 Central Files

LWilcken:lw:07/22/2013

## Scoping Comments

Number	Comment <sup>4</sup>	Issues/Response
	<b>National Park Service, Southeast Utah Group, Kate Cannon, Superintendent</b>	
NPS 1.	Request BLM consult with the Utah Air Resources Technical advisory Group for air quality analysis in the EA.	Per the Interagency Air Quality Memorandum of Understanding, the proposed action does not require consultation.
NPS 2.	Include air quality mitigation Lease Notice.	The proposed action includes RMP directed air quality stipulation attached to all lease parcels. Additional LN for Regional Ozone Formation and Air Quality Analysis will be attached to all lease parcels.
NPS 3.	Fugitive Dust impacts to air quality and air quality related values; Stream flow and other hydrologic processes through downwind effects of dust on mountain snow cover; visual resources and night skies.	Air Quality will be analyzed in detail in the EA (see appendix C).
	<b>Nancy Gardner/Dian Gardner Split Estate Private Surface Owner (Parcels 152 and 154)</b>	
Gardner 1.	Impacts to cultural resources.	Several parcels were deferred for several reasons including staff availability to conduct adequate analysis. It was determined that the MtFOhad staff resources available to adequately analyze the parcels recommended for lease sale, including 152 and 154. Based on this analysis, a determination of “no adverse affect” was made for the February 2014 Oil and Gas Lease Sale, therefore, cultural resources will not be impacted to the degree that would require detailed analysis in the EA (see appendix C).
Gardner 2.	Impacts to springs.	Standard operating procedures required by regulation and policy (OOGO#2 and 7, and UT IM 2010-055) are designed to adequately protect ground water. BMPs included in APD submittals or attached to approved permits adequately mitigate impacts to surface water. Water resources will not be impacted to the degree that would require detailed analysis in the EA (see appendix C).
	<b>Anadarko E&amp;P Onshore LLC</b>	
Anadarko 1.	Parcel specific rationale for deferment.	This is provided in the EA appendix G.

<sup>4</sup> In order to capture the nature of the comment, BLM has either extracted statements in their entirety, brought forward portions of the statements or has summarized the statement for presentation in this table.

Number	Comment <sup>4</sup>	Issues/Response
Anadarko 2.	Hydraulic fracturing, horizontal drilling.	The exploration and development assumed in the proposed action is based on the Mt and Mb RFDs used to analyze impacts from oil and gas in the respective RMPs to which this EA is tiered. The BLM recognizes that hydraulic fracturing and horizontal drilling may reduce the number of well pads, roads, etc.
Anadarko 3.	Gunnison sage grouse and habitat should not be a reason for deferral as they are not yet a federally protected species.	The Gunnison sage grouse is proposed for protection under the ESA as an “endangered” species. As of this time there is no designated ‘critical habitat’, however the USFWS has “proposed critical habitat”. Several parcels were deferred for several reasons including staff availability to conduct adequate analysis. It was determined that the CCDO had staff resources available to adequately analyze the parcels recommended for lease sale. Staff resources were not available to conduct an adequate analysis of parcels located in areas likely to be designated as critical habitat if the Gunnison sage grouse should be listed as a protected species. Refer to appendix C for additional information.
<b>Sierra Club, Utah Chapter, Bill Rau</b>		
Sierra 1.	Identifies climate change as potentially impacted and analyzed in the EA	The rationale for not conducting a detailed analysis in the EA for Climate change (greenhouse gas emissions) is contained in appendix C, ID team Checklists.
Sierra 2.	Identifies Statement of Need as important in the EA.	The statement of need is a required part of all NEPA documents.
Sierra 3.	Why EA is used rather than an EIS.	If, after the EA is prepared, the authorized officer signs a FONSI, an EIS is not required.
Sierra 4.	Assumptions regarding exploration and development, and resources not analyzed.	The exploration and development assumed in the proposed action is based on the Mt and Mb RFDs used to analyze impacts from oil and gas in the respective RMPs, to which this EA is tiered. All exploration and development is subject to standard operating procedures required by regulation. BMPs included in APD submittals or attached to approved APDs as COAs adequately mitigate impacts to other resources (i.e. vegetation, soils, surface water, wildlife habitat). These resources will not be impacted to the degree that would require detailed analysis in the EA (see appendix C).
Sierra 5.	Hydraulic fracturing (impacts to ground water)	The exploration and development assumed in the proposed action is based on the Mt and Mb RFDs used to analyze impacts from oil and gas in the respective RMPs to which this EA is tiered. The BLM recognizes that hydraulic fracturing may be a part of an oil and gas well completion operation. All development proposals are subject to standard operating procedures required by regulation and BLM policy (OOGO#2 and 7, and UT IM 2010-055). Additionally, in cases where a lease intersects a drinking water source protection zone, LN -56 is attached to that lease. This mitigation will adequately protect ground water resources. Water resources will not be impacted to the degree that would require detailed analysis in the EA (see appendix C).
Sierra 6.	Air quality	See comments 1, 2, and 3.

<b>Number</b>	<b>Comment<sup>4</sup></b>	<b>Issues/Response</b>
Sierra 7.	Water quality	See comments 5 and 13.
Sierra 8.	Impacts to public health	Analysis of impacts to public health is included in the analysis of other resources such as air quality and water quality. Public health is not analyzed separately in the EA.
Sierra 9.	Socio-economic Impacts	Impacts from oil and gas leasing and development were adequately analyzed in the Monticello and Moab RMPs. This EA document includes by reference the socio economic analysis contained in the RMPs.
Sierra 10.	Visual resources associated with parcel 074.	This parcel lies within RMP designated VRM Class III which allows for oil and gas development compatible with VRM class III objectives Visual resources will not be impacted to the degree that would require detailed analysis in the EA (see appendix C).
Sierra 11.	Surface water (Green Rive), visual impact and road access associated with parcels 002 and 003.	See comment 5. Inclusion of stipulation UT-S-158 – VRM II will mitigate impacts to visual resources. All lease parcels are accessed by existing Moab travel management plan roads. Oil and gas exploration and development will not substantially change public access.
Sierra 12.	Assessment of both short term and long term impacts.	The preparation of an EA document requires an analysis of direct and indirect impacts of the proposed action; and an analysis of the cumulative impacts from past, present and reasonably foreseeable action. This will be included in the EA.
Sierra 13.	Cultural Resources	See comment #4.
Sierra 14.	BLM ability to monitor compliance of lease activities.	BLM oil and gas inspection and enforcement (I&E) program is a high priority ongoing program with annual requirements and targets. When issues of non-compliance arise they are addressed in a timely manner.
Sierra 15.	Mis-information	The commenter is correct in the observation that State Route 666 has been changed to US route 491. However, when conducting the analysis of the parcels to determine conformance with the RMPs the BLM uses the latest layers prepared during the RMP process.
	<b>Ramon Reed</b>	
Reed 1.	Impact of Gunnison sage grouse and habitat.	See comment 8. The commenter has commented that it appears several parcels are located in critical habitat. In fact, during the preliminary analysis, the BLM used the USFWS layer for the proposed critical habitat and deferred all parcels or portions of parcels that intersected this layer.
	<b>Southern Utah Wilderness Alliance</b> Note: SUWA comments pertain only to the lease parcels (22) listed in the comment letter.	
SUWA 1.	Several parcels are located within the Glen Canyon Master Leasing Plan area.	The Utah State Director, in a memorandum dated September 23, 2013, utilized the discretion afforded by WO IM 2010-117 to revise the Glen Canyon MLP. This revision includes the removal from the Glen Canyon MLP area of those

Number	Comment <sup>4</sup>	Issues/Response
		lands lying east of U.S. Highway 191. Based on this revision, no parcels proposed for leasing in the proposed action are within the Glen Canyon MLP area.
SUWA 2.	Relevant and important values of the San Juan River ACEC (parcels 161 and 162).	The commenter states that leasing these parcels would threaten the relevant and important values of the San Juan River ACEC. Parcel 161 does not intersect the ACEC. A portion of parcel 162 lies within the ACEC and will have RMP directed stipulation UT-S-16 NSO – San Juan River ACEC attached to the lease. This stipulation will adequately mitigate impacts to the ACEC. ACEC resources will not be impacted to the degree that would require detailed analysis in the EA (see appendix C)
SUWA 3.	Parcel 225 is located within BLM identified lands with wilderness characteristics.	Wilderness Character inventories in 1999 and 2007 determined a portion of parcel 225 (40 acres) possess wilderness character; however the RMP decision WC-1, pg. 85 determined that this area of wilderness character would not be managed to preserve wilderness characteristics. Wilderness character will not be impacted to the degree that would require detailed analysis in the EA (see appendix C)
SUWA 4.	BLM must take a hard look at the impacts of leasing on climate.	See comment 9.
SUWA 5.	BLM must take a hard look at the impacts of leasing on air Quality.	See comment 1, 2, and 3. Air quality will be analyzed in detail in the EA.
SUWA 6.	SUWA expects that BLM will review and acknowledge the findings in the Stiles Report and integrate them as appropriate in is pre-leasing analysis.	Current BLM oil and gas leasing policy is directed by WO IM 2010-117 Oil and Gas Leasing Reform. As stated in the Background section of this IM many of the recommendations contained in the “Stiles Report” are incorporated into the IM.
SUWA 7.	BLM must comply with the requirements of IM 2010-117.	The CCDO processing of the May 2014 oil and gas lease sale is guided by and in conformance with WO IM 2010-117.
SUWA 8.	Updated Visual Resource Inventory	Updated VRM inventories have been completed in the MbFO area and are in progress in the MtFOarea. BLM management decisions are not guided by these updated VRM inventories. BLM management decisions are guided by the management decisions in the respective RMPs.
SUWA 9.	Gunnison sage grouse	See comments 8 and 24.
SUWA 10.	Parcel 003 threatens endangered fish and habitat.	Portions of parcel 003 do occur in areas designated by the Moab RMP as critical habitat of the endangered Colorado River fishes. The Moab RMP directs stipulation UT-S-183: NSO–Critical Habitat of the Endangered Colorado Fishes be attached to this lease. This NSO stipulation will adequately mitigate impacts to the critical habitat. Threatened and endangered animal species and habitat will not be impacted to the degree that would require detailed analysis in the EA (see appendix C)
	<b>Utah Public Lands Policy Coordination Office – Division of Wildlife Resources (UDWR)</b>	
Utah 1.	Timing Limitation for crucial habitat for pronghorn.	UDWR identifies several parcels a containing crucial habitat for pronghorn. It is

Number	Comment <sup>4</sup>	Issues/Response
		noted here that the MtFO RMP does have a stipulation for pronghorn protection; however, RMP decision MIN-10 specifies only cultural, ESA and Gunnison sage-grouse stipulations will apply to private split estate surface. Where BLM surface is involved and the pronghorn habitat area, as defined by the RMP is present, the pronghorn stipulation has been attached. In cases where the UDWR identified pronghorn habitat not consistent with BLM habitat data, lease notice UT-LN-15 will be attached (parcels 002, 003, 174 and 176).
Utah 2.	Recommendation for Raptor surveys.	UDWR identifies raptor nests and habitat in several parcels and recommends surveys be conducted. The BLM will attach a raptor survey lease notice (UT-LN-43 and 44) to all parcels.
Utah 3.	Timing limitation for burrowing owls.	UDWR identifies burrowing owl habitat within 0.5 miles of parcel 174 and recommends a timing restriction. The MbFO has a burrowing owl RMP stipulation attached to appropriate parcels. The MtFO has no RMP stipulation for burrowing owls. The MtFO RMP decision SSS-19 requires BLM management to be guided the “Best Management Practices for Raptors and Their Associated Habitats in Utah”. These BMP include burrowing owls. The Raptor lease notice UT-LN-43 (MtFO) and 44 (MbFO) is attached to all parcel, including parcel 174 in accordance with the RMP decision.
Utah 4.	Timing limitation for crucial winter/year long range for mule deer/elk.	UDWR identifies several parcels as containing crucial deer and elk habitat. In most cases the BLM and UDWR habitat data are consistent. In some cases they are not. For those parcels identified by UDWR as deer and elk habitat and not specified as such in the MtFO RMP, lease notice UT-LN-04: Crucial Deer and Elk Habitat will be attached. As stated in #34, deer and elk habitat stipulations and lease notices would not apply to private split estate surface.
Utah 5.	Timing limitation for Gunnison sage-grouse wintering and brood-rearing habitat and lek.	UDWR identifies several parcels as containing Gunnison sage-grouse habitat. During the initial review the BLM recommended for deferral all parcels or portions of parcels that contained any proposed critical habitat of the Gunnison sage-grouse as defined by the USFWS.
	<b>The Hopi Tribe</b>	
Hopi 1.	The Hopi Tribe has repeatedly recommended the BLM not offer for oil and gas lease areas of high site density due to indirect and direct adverse effects to cultural resources. The Hopi Tribe requests that areas of high site density (Groups 2 and 6) not be offered for oil and gas leasing in the 2014 lease sale or any other future oil and gas lease sale	<p>The management of all resources, including cultural resources and oil and gas resources, is directed by Federal laws and regulations and the goals, objectives and decisions contained in the Monticello and Moab Resource Management Plans, 2008. Included in the respective RMPs are protection of cultural resources in accordance with existing laws (National Historical Preservation Act, Archaeological Resources Protection Act) and regulations; and the exploration and development of energy resources subject to RMP resource decisions and oil gas leasing stipulations.</p> <p>Oil and gas leasing stipulations will be attached to every parcel to protect cultural resources. While past oil and gas activities have caused direct adverse impacts to cultural resources, current BLM management as directed by laws, policy, and RMPs attempts to ensure that oil and gas development can occur</p>

Number	Comment <sup>4</sup>	Issues/Response
Hopi 2.	The Hopi Tribe does not support the BLMs one well assumption when making the determination of no historic properties affected for oil and gas leasing purposes. You specifically refer to the lack of roads on some of the parcels.	while avoiding or, in a few cases, mitigating impacts to cultural resources. The one well assumption is employed when a BLM archaeologist conducts the records search inventory to determine if one oil and gas well including associated roads, pipelines or other production facilities could be located on a lease parcel and still be able to make a “no adverse effect to historic properties” determination. This one well assumption is the method BLM employs to conduct NEPA (National Environmental Protection Act) analysis at the oil and gas leasing stage.
Hopi 3.	The Hopi Tribe requests BLM to undertake additional cultural resource survey in areas of high site densities or where the percentage of the area of potential effect previously surveyed is less than 10%.	The current BLM procedure of conducting a records search survey is adequate for NEPA analysis purposes at the oil and gas leasing stage. When necessary BLM by resource specialists, including archaeologists, conduct parcel visits to confirm resources and issues present. Spot checks of a judgmental sample of 28 parcels were conducted by archeologists, and two of the smallest parcels were selected for some reconnaissance inventory. Nothing was found which would change the determination of No Adverse Effect.
Hopi 4 2013.11.18	Why is the BLM proposing leasing in the Moab Field Office prior to developing the proposed Master Leasing Plan (MLP)?	The area covered by the Moab MLP includes portions of both the Moab and Monticello Field Offices. None of the parcels proposed to be offered for the 2014 lease sale occur within the Moab MLP area. The Moab MLP is currently being prepared jointly by the Moab and Monticello Field Office
Hopi 5 2013.11.18	Why is the Monticello Field Office not developing a MLP	It is assumed the commenter is referring to the Glen Canyon MLP. The Glen Canyon MLP is not funded and preparation has not yet commenced. In accordance with the Oil and Gas Leasing Reform Implementation Plan, Utah State Office, September 2010, the BLM will not undertake to consider expressions of interest in MLP areas.  However, verbal instructions from the Utah State Office to the Moab and Monticello Field Offices were to undertake to consider the lease parcels located within the Glen Canyon MLP area east of US Highway 191 as it is likely the State Director will adjust the MLP boundary prior to conducting the lease sale
Hopi 6 2013.11.18	The Hopi Tribe requests the BLM comply with the Court’s decision (US District Court for the District of Utah, Central Division, Case 2:12-cv-257-DAK) not only for the Richfield 2008 Resource Management Plan and Travel Plan but all of its undertakings including this proposed lease sale as it relates to compliance with the National Historic Preservations Act and to the application of minimization criteria.	The issues before the Court in the referenced Court Memorandum Decision and Order do not include oil and gas leasing. The specific reference to a Class I cultural resource survey being inadequate relates to cultural resources present on designated routes in limited off highway vehicle use areas as specified in the Richfield RMP and Travel Management Plan (see page 17 of Court Decision).  The regulations at 43 CFR 8342.1 require the BLM to apply minimization criteria when designating routes during the RMP and Travel Management Planning process. In the court ruling the failure to apply minimization criteria relates to the designation of routes in the Richfield RMP and Travel Management Plan. It may not be applicable to an oil and gas lease or possible road construction activities that may occur as a result of oil and gas exploration and development.

Number	Comment <sup>4</sup>	Issues/Response
		<p>The oil and gas lease sale could lead to the construction of designated routes in the future, however, any potential impacts would be minimized in the design of these routes. This would include minimization of potential safety conflicts, potential impacts to natural and cultural resources including wildlife and their habitat, and potential conflicts with other public land uses including various recreational uses.</p> <p>In particular, all surface disturbing activities associated with oil and gas exploration and development, including new access routes, would be subject to a Class III cultural inventory prior to any surface disturbing activity. Any effects to cultural resources would be avoided or mitigated. It is not possible at this time to determine if or where future roads would be constructed.</p>
	<b>San Juan County Commission</b>	
SJ County 1.	San Juan County is concerned that BLM is deferring 63% of the parcels contained on the preliminary list for various reasons and the effect to tax revenue for San Juan County.	The BLM understands the importance of energy leasing and development to State and County revenues. The Canyon Country District has proposed offering for lease parcels in accordance with the respective RMPs and considering limited staff availability for lease sale processing.
	<b>Ute Mountain Ute Tribe</b>	
Ute 1	The Tribe is concerned that some of the lease parcels are located near the White Mesa Community and on or adjacent to Tribal lands.	Lease parcels are located near the White Mesa Community and Tribal lands. The parcel nearest to the White Mesa Community, parcel 155, is located within 1.5 miles of the White Mesa Community and adjacent to Tribal lands. The remaining parcels are located within 4.5 miles of Tribal lands and within seven miles of the White Mesa Community. No parcels are located on Tribal lands.
Ute 2	The Tribe has not been consulted on the potential impacts to Tribal members, and to Tribal water, natural, cultural and mineral resources.	On August 30, 2013 the BLM sent letters to several Native American Tribes, including the Ute Mountain Ute Tribe. The purpose of the letter was to initiate Native American consultation.
Ute 3	The Tribe strongly recommends the BLM remove six parcels (107, 108, 111, 152, 154, and 155) that are on or just adjacent to the White Mesa Community. The Tribe will expect full consultation before any of these parcels are offered for another sale.	Consultation is ongoing.
Ute 4	The Tribe requests a consultation meeting regarding this lease sale.	Consultation is ongoing.
	<b>Joshua Jones</b>	
Jones 1	Mr. Jones received word that his split estate private surface is being included in the lease sale (parcel 225) from a neighbor who received notice of the lease sale as the owner of the parcel. He points out, among other things, that whoever provided the EOI for this parcel failed to provide the BLM with accurate ownership information which, he points out, is the same as not providing the information at all.	The BLM must assume the commenters' letter is accurate and truthful. The surface owner information provided in the expression of interest was apparently inaccurate and, as correctly indicated by the commenter, is the same as not providing the information at all. To defer only the split estate private surface for this parcel would affect the cultural analysis. Therefore, this entire parcel is deferred.

## **Appendix F – Native American/SHPO Consultation**

13-1199

RECEIVED  
MONTICELLO FIELD OFFICE

13 OCT 21 AM 11:14

DEPT. OF THE INTERIOR  
BUREAU OF LAND MGMT



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Monticello Field Office  
P.O. Box 7  
Monticello, UT 84535  
<http://www.blm.gov/utah/monticello>



IN REPLY REFER TO:  
1310  
(UTY-020)

State Historic Preservation Officer  
Utah State Historical Society  
300 Rio Grande  
Salt Lake City, Utah 84101-1182

SEP 20 2013

## PART I. Project Description

County: San Juan  
Project Number: Not Applicable

The following undertaking, the BLM Monticello Field Office Quarterly Oil and Gas Lease, February 2014:

	(1) is a non-routine interstate and/or interagency project or program
	(2) directly affects a National Register eligible or listed property
	(3) has been determined by BLM, the SHPO or the Council to be highly controversial
	(4) is one of the following: a land exchange, land sale, Recreation and Public Purpose lease, or transfer
X	(5) is one which we wish to bring to your attention

BLM determines that this undertaking will result in No Adverse Effect, as discussed in the enclosed staff report.

Received  
SEP 25 2013  
USHPO

PART II. Determination of Eligibility to the National Register of Historic Places.

BLM requests your concurrence on the following determinations of eligibility and effect:  
Not Applicable

DETERMINATION OF ELIGIBILITY					DETERMINATION OF EFFECT ON HISTORIC PROPERTIES		
SITE NUMBER	NOT ELIGIBLE	NEED DATA	ELIGIBLE	ELIGIBILITY CRITERIA	NO EFFECT	NO ADVERSE EFFECT	ADVERSE EFFECT

Please review the enclosed documentation, then sign and return this letter with your comments within ten working days.

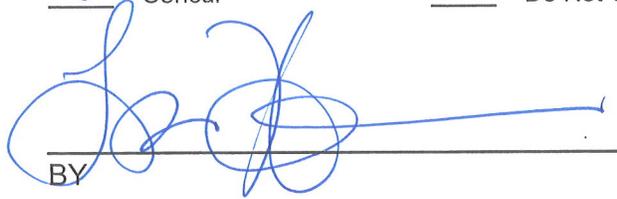
BUREAU OF LAND MANAGEMENT, MONTICELLO FIELD OFFICE

  
 BY FIELD OFFICE ARCHAEOLOGIST Sept. 20, 2013  
 DATE

  
 BY FIELD OFFICE MANAGER 9/20/2013  
 DATE  
 Donald K Hoffheins

UTAH STATE HISTORIC PRESERVATION OFFICER

Concur  Do Not Concur

  
 BY 10.15.13  
 DATE

COMMENTS:

Enclosure: Staff Report



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Monticello Field Office  
P.O. Box 7  
Monticello, UT 84535  
<http://www.blm.gov/utah/monticello>



IN REPLY REFER TO:  
8100  
3100  
(UTY-020)

Mr. Harold Reid, Governor  
Pueblo of Zia  
135 Capital Square Drive  
Zia Pueblo, NM 87053

Re: February 2014 Competitive Oil and Gas Lease Sale Parcels

Dear Mr. Reid:

The Bureau of Land Management (BLM) Utah State Office proposes to offer 53 parcels covering approximately 45,300 acres of land for the February 2014 Competitive Oil and Gas Lease Sale. The Canyon Country District of the BLM is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA). These parcels are located in both the Monticello and Moab Field Office areas. Maps showing the nominated parcels are attached. We are providing these maps, as well as the lease sale parcel list, for your review and to provide an opportunity to consult on any cultural resource, traditional cultural properties, or religious concerns that you may have.

Leasing by itself does not authorize ground disturbing activities. To drill a well, a lease holder would first file an Application for Permit to Drill (APD), and in it would specify the location and operational details of their proposed well site. At that time, BLM would conduct the necessary inventories and consultations, and would not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the National Historic Preservation Act (NHPA) and other authorities. The BLM may require modification to exploration or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated.

The BLM Canyon Country District Office would appreciate any comments or concerns that you may have about the nominated parcels. We request that your comments be received no later than 30 business days from receipt of this letter. Our correspondence address is:

Bureau of Land Management  
P.O. Box 7  
Monticello, Utah 84535.

Thank you for your continuing interest in public land management. Your time and attention to this request is appreciated. If you have any questions or would like additional information, please feel free to contact Don Simonis, Archaeologist, at 435-587-1513.

Sincerely,

Donald K. Hoffheins  
Field Manager

Enclosures: Maps of Lease Parcels  
List of Lands (Legal Descriptions)

Master Tribal Consultation List  
Monticello Field Office

As of 03/08/2013

---

**Harold Reid**, Governor

Pueblo of Zia

135 Capitol Square Drive

Zia Pueblo, NM 87053

505.867.3304

(Cultural) cc.

Peter Pino, Cultural Resources Director

Pueblo of Zia

135 Capitol Square Drive

Zia Pueblo, NM 87053

---

Gary Hayes, Chairman

Ute Mountain Ute Tribe

P.O. Box **JJ**

Towaoc, CO 81334

(Cultural) cc.

Terry Knight, Historic Preservation Director

970.565.3751 ext. 727

Ute Mountain Ute Tribe

P.O. Box 468

Towaoc, CO 81334

---

Elaine Aticity, Councilwoman

White Mesa Ute Council

P.O. Box 7096

435.678.3685

White Mesa, UT 84511

(Cultural) cc. Same as above

---

Arlen Quetawki, **Sr.**, Governor

Pueblo of Zuni

505.782.7022

P.O. Box 339

Zuni, NM 87327

(Cultural) cc.

**Kurt Dongoske**

505.782.4814

**Director and Tribal Historic Preservation Officer**

Pueblo of Zuni

P.O. Box 1149

Zuni, NM 87327

---

Ben Shelly, President  
Navajo Nation Office of the President 928.871.6352  
P.O. Box 7440  
Window Rock, AZ 86515

(Cultural) cc.  
Timothy Begay, Program Manager 928.871.7136  
Navajo Nation Historic Preservation Department  
Traditional Culture Program  
P.O. Box 4950  
Window Rock, AZ 86515

---

Leroy Ned Shingoitewa, Chairman 928.734.3000  
Hopi Tribe Chairman's Office  
P.O. Box 123  
Kykotsmovi, AZ 86039

(Cultural) cc.  
Leigh Kuwanwisiwma  
Hopi Cultural Preservation Office  
The Hopi Tribe  
P.O. Box 123  
Kykotsmovi, AZ 86039

---

**Gregg Shutiva**, Governor 505.552.6604  
Pueblo of Acoma  
Cultural Preservation Office  
P.O. Box 309  
Acoma, NM 87034

(Cultural) cc. 505.552.527 or 505.264.3474  
Theresa Pasqual, Director  
Historic Preservation Office  
P.O. Box 309  
Acoma, NM 87034  
[tpasqual@puebloofacoma.org](mailto:tpasqual@puebloofacoma.org)

---

Richard Luarkie, Governor  
Pueblo of Laguna  
P.O. Box 194  
Laguna Pueblo, NM 87026

(Cultural) cc.

**Casey Duma, Cultural Resources** 505.552.1200  
Pueblo of Laguna  
P.O. Box 194  
Laguna Pueblo, NM 87026

---

**Bruce Tafoya, Governor**  
Pueblo of Santa Clara 505.753.7330  
P.O. Box 580  
Española, NM 87532

(Cultural) cc.

Gilbert Tafoya 505.753.7326  
Office of Cultural Preservation  
Pueblo of Santa Clara  
P.O. Box 580  
Española, NM 87532

---

Irene Cuch, Chairwoman  
Office of the Chairwoman 435.722-5141 ext. 2.  
Uintah and Ouray Ute Tribe  
P.O. Box 190  
Ft. Duchesne, UT 84026

(Cultural) cc.

Betsy Chapoose, Director 435.722.4992  
Office of Cultural Rights and Protection  
Uintah and Ouray Ute Tribe  
P.O. Box 190  
Ft. Duchesne, UT 84026

---

**Vincent Toya, Sr., Governor**  
Office of the Governor 575.834.7359  
P.O. Box 100  
Jemez, Pueblo, NM 87024

(Cultural) cc

Christopher Toya  
Department of Resource Protection 575.834.7696  
P.O. Box 100  
Jemez Pueblo, NM 87024

---

**Native American Consultation List for BLM Moab Field Office  
August, 15, 2013**

<b>Title</b>	<b>First Name</b>	<b>Last Name</b>	<b>Company Name</b>	<b>Address Line 1</b>	<b>City</b>	<b>State</b>	<b>Zip</b>
Mr.	Terry	Morgart	Hopi Tribe	PO Box 123	Kykotsmovi	AZ	86039
Director	Leigh	Kuwanwisiwma	Hopi Tribe	PO Box 123	Kykotsmovi	AZ	86039
Cultural Specialist	Kelly	Francis	Navajo Nation	PO Box 4950-	Window Rock	AZ	86515
Program Manager	Tony H.	Joe. Jr.	Navajo Nation	PO Box 4950	Window Rock	AZ	86515
Chairwoman	Jeanie	Borchardt	Paiute Tribe	440 North Paiute Drive	Cedar City	UT	84720
Cultural Resource Director	Dorena	Martineau	Paiute Tribe	440 North Paiute Drive	Cedar City	UT	84720
Chairman	Jimmy R.	Newton	Southern Ute Tribe	PO Box 737	Ignacio	CO	81137
NAGPRA Coordinator	Alden	Naranjo	Southern Ute Tribe	PO Box 737	Ignacio	CO	81137
Chairwoman	Irene	Cuch	Ute Indian Tribe	PO Box 190	Fort Duchesne	UT	84026
Director	Betsy	Chapoose	Ute Indian Tribe	PO Box 190	Fort Duchesne	UT	84026
Chairman	Gary	Hayes	Ute Mountain Ute Tribe	PO Box JJ	Towaoc	CO	81334
Tribal Historic Preservation Officer	Terry	Knight	Ute Mountain Ute Tribe	PO Box JJ	Towaoc	CO	81334
Council Member	Elayne	Atcitty	White Mesa Ute Tribe	PO Box 7096	Blanding	UT	84511
Director	Kurt	Dongoske	Zuni Pueblo	PO Box 339	Zuni	NM	87327
Governor	Arlen	Quetawki Sr.	Zuni Pueblo	PO Box 339	Zuni	NM	87327



RECEIVED  
MONTICELLO FIELD OFFICE  
13 SEP 23 PM 12:25  
DEPT. OF THE INTERIOR  
BUREAU OF LAND MGMT

LeRoy N. Shingoitewa  
CHAIRMAN

Herman G. Honanie  
VICE-CHAIRMAN

September 10, 2013

Donald K. Hoffheins, Field Manager  
Attention: Don Simonis, Archaeologist  
Bureau of Land Management, Monticello Field Office  
P.O. Box 7  
Monticello, Utah 84535

Dear Mr. Hoffheins,

Thank you for your correspondence dated August 30, 2013, regarding the Moab and Monticello Field Offices considering the sale of 53 oil and gas lease parcels on Bureau of Land Management (BLM) lands covering 45,000 acres in February, 2014.

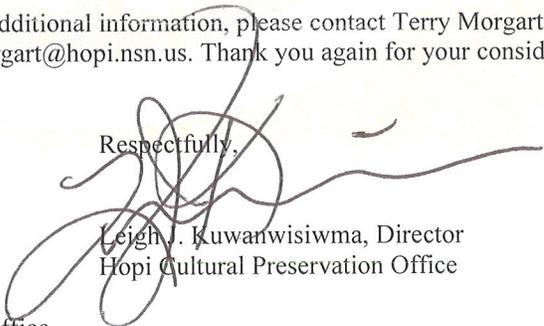
The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Utah. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the BLM, Monticello and Moab Field Offices' continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office has repeatedly recommended the BLM not lease parcels with high densities of prehistoric sites, since the co-mingling of energy development and cultural resource protection has been demonstrated to result in indirect and direct adverse effects to cultural resources. Therefore, we reiterate our call to the State Director to adopt a policy whereby Field Offices statewide identify parcels with high densities of prehistoric sites which will be withdrawn from further consideration for leasing.

We understand an environmental assessment is being prepared. To assist us in determining if this proposal may adversely affect cultural resources significant to the Hopi Tribe, please provide us with copies of the Class I overview of the area of potential effect and the draft environmental assessment for review and comment.

If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or [tmorgart@hopi.nsn.us](mailto:tmorgart@hopi.nsn.us). Thank you again for your consideration.

Respectfully,

  
Leigh J. Kuwanwisiwma, Director  
Hopi Cultural Preservation Office

xc: Juan Palma, Byron Loosle, BLM State Office  
BLM, Moab Field Office  
Utah State Historic Preservation Office



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Monticello Field Office  
P.O. Box 7  
Monticello, UT 84535  
<http://www.blm.gov/utah/monticello>



IN REPLY REFER TO:

8100  
(UTY-020)

SEP 25 2013

Mr. Leigh Kuwanwisiwma  
Hopi Cultural Preservation Office  
The Hopi Tribe  
P.O. Box 123  
Kykotsmovi, AZ 86039

Subject: Class I Overview for 2014 Oil and Gas Lease Parcels.

Dear Mr. Kuwanwisiwma:

Thank you for your correspondence dated September 10, 2013, regarding The Bureau of Land Management Moab and Monticello Field Offices considering the sale of oil and gas leases in 2014. You requested copies of the Class I overview of the area of potential effect and the draft environmental assessment (EA) for review and comment.

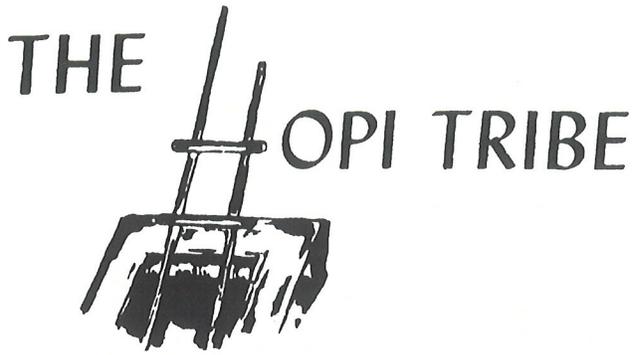
We are providing a copy of the records search and site analysis report with maps that was completed for the proposed action. A copy of the draft EA should be available by the end of October.

Please let us know if you have any concerns for this proposed action. Our archaeologist responsible for Native American consultation is Don Simonis. His telephone number is (435) 587-1513 or email to [dsimonis@blm.gov](mailto:dsimonis@blm.gov).

Sincerely,

Donald K. Hoffheins  
Monticello Field Manager

Enclosures: Records search and analysis report  
maps  
DSimonis;kmj;O&Gresponseltr



RECEIVED  
MONTICELLO FIELD OFFICE  
13 OCT 17 AM 9:43  
DEPT. OF THE INTERIOR  
BUREAU OF LAND MGMT

LeRoy N. Shingoitewa  
CHAIRMAN

Herman G. Honanie  
VICE-CHAIRMAN

October 9, 2013

Donald K. Hoffheins, Field Manager  
Attention: Don Simonis, Archaeologist  
Bureau of Land Management, Monticello Field Office  
P.O. Box 7  
Monticello, Utah 84535

Dear Mr. Hoffheins,

Thank you for your correspondence dated September 25, 2013, with an enclosed cultural resources overview report, in response to our September 10, 2013, letter regarding the Moab and Monticello Field Offices considering the sale of 53 oil and gas lease parcels on Bureau of Land Management (BLM) lands covering 45,000 acres in February, 2014. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Utah. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the BLM, Monticello and Moab Field Offices' continuing solicitation of our input and your efforts to address our concerns.

In our September 10, 2013, letter the Hopi Cultural Preservation Office reiterated that we have repeatedly recommended the BLM not lease parcels with high densities of prehistoric sites, since the co-mingling of energy development and cultural resource protection has been demonstrated to result in indirect and direct adverse effects to cultural resources.

We have now reviewed the enclosed records search and site analysis report of 52 parcels that was completed for the proposed action. We do not support the "one well" assumption in areas of high site densities. The report states that 23 of these parcels are not crossed by existing roads and, "it should be acknowledged that it would be harder to access the one well while still avoiding archaeological sites, particularly in areas where site density is higher."

We note Groups 2 and 6 have high site densities of 62 sites per square mile, and the other eight Groups contain moderately high site densities ranging between 9 and 39 sites per square mile. We also note that the percentage of acres in the Groups inventoried for cultural resources ranges from a low of 3.9% to a high of 18.3% with only two Groups exceeding 10%.

RECEIVED  
MONTICELLO FIELD OFFICE

13 OCT 17 AM 9:43

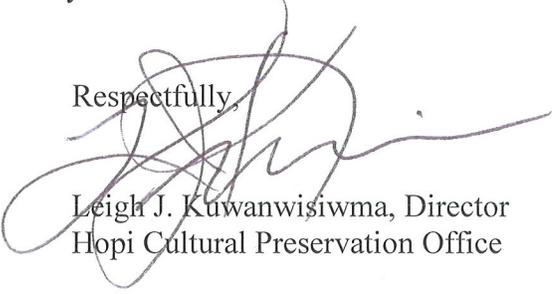
DEPT. OF THE INTERIOR  
BUREAU OF LAND MGMT

Donald K. Hoffheins  
October 9, 2013  
Page 2

Therefore, we request that the parcels identified as Groups 2 and 6 containing high site densities be withdrawn from the February, 2014, lease sale and every subsequent lease sale. We also request the BLM undertake additional cultural resource survey in areas of high site densities or where the percentage of the area of potential effect previously surveyed is less than 10%. We also reiterate our call to the State Director to adopt a policy whereby Field Offices statewide identify parcels with high densities of prehistoric sites which will be withdrawn from further consideration for leasing.

We look forward to being provided with a copy of the draft environmental assessment for review and comment. If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or [tmorgart@hopi.nsn.us](mailto:tmorgart@hopi.nsn.us). Thank you again for your consideration.

Respectfully,



Leigh J. Kuwanwiswma, Director  
Hopi Cultural Preservation Office

xc: Juan Palma, Byron Loosle, BLM State Office  
BLM, Moab Field Office  
Utah State Historic Preservation Office  
Steve Bloch, Southern Utah Wilderness Alliance



## United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Monticello Field Office  
P.O. Box 7  
Monticello, UT 84535  
<http://www.blm.gov/utah/monticello>



IN REPLY REFER TO:

8100  
(UTY-020)

Mr. Leigh Kuwanwisiwma  
Hopi Cultural Preservation Office  
The Hopi Tribe  
P.O. Box 123  
Kykotsmovi, AZ 86039

NOV 08 2013

Subject: Moab and Monticello Field Offices' (Canyon Country District) 2014 Oil and Gas Lease Sale

Dear Mr. Kuwanwisiwma:

Thank you for your correspondence dated October 9, 2013, regarding the Bureau of Land Management Moab and Monticello Field Offices considering the sale of oil and gas leases in 2014. In your letter you make the following points:

1. The Hopi Tribe has repeatedly recommended the BLM not offer for sale oil and gas leases in areas of high cultural site density due to indirect and direct adverse effects to those resources. The Hopi Tribe requests that areas of high site density (Groups 2 and 6) not be offered for oil and gas leasing in the 2014 lease sale or any other future oil and gas lease sale.

### BLM Response

The management of all resources, including cultural resources and oil and gas resources, is directed by Federal laws and regulations, and the goals, objectives and decisions contained in the Monticello and Moab Resource Management Plans, 2008 (RMPs). Included in the respective RMPs are measures for protection of cultural resources in accordance with existing laws (National Historical Preservation Act, Archaeological Resources Protection Act) and regulations; and the exploration and development of energy resources subject to RMP resource decisions and oil and gas leasing stipulations.

Oil and gas leasing stipulations will be attached to every parcel to protect cultural resources. While past oil and gas activities have caused direct adverse impacts to cultural resources, current BLM management as directed by laws, policy, and RMP direction attempts to ensure that oil and gas development can occur while avoiding or, in a few cases, mitigating impacts to cultural resources.

2. The Hopi Tribe does not support the BLM's one well assumption when making the determination of no historic properties affected for oil and gas leasing purposes. You specifically refer to the lack of roads on some of the parcels.

BLM Response

The one well assumption is employed when a BLM archaeologist conducts the class I (records search) inventory to determine if one oil and gas well including associated roads, pipelines or other production facilities could be located on a lease parcel and still be able to make a "no adverse effect to historic properties" determination. This one well assumption is the method BLM employs to conduct NEPA (National Environmental Protection Act) analysis at the oil and gas leasing stage.

3. The Hopi Tribe requests BLM to undertake additional cultural resource survey in areas of high site densities or where the percentage of the area of potential effect previously surveyed is less than 10%.

BLM Response

The current BLM procedure of conducting a class I survey is adequate for NEPA analysis purposes at the oil and gas leasing stage. When necessary BLM resource specialists, including archaeologists, conduct parcel visits to confirm resources and issues present.

4. The Hopi Tribe looks forward to being provided with a copy of the draft environmental assessment (EA) for review and comment.

BLM Response

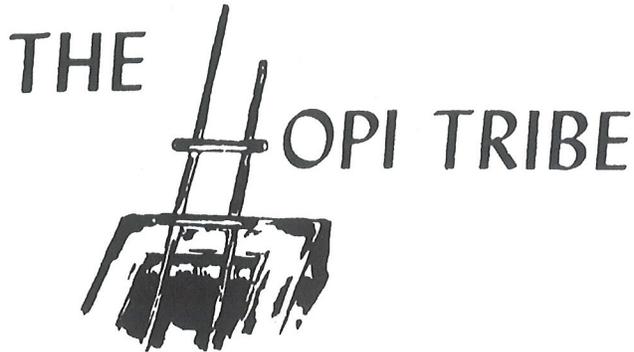
The Canyon Country District has conducted public scoping, Native American Consultation, coordination with other agencies, and notification of private split estate owners. The BLM appreciates input and comments provided by all interested parties during the preparation of the EA. The draft EA is currently being prepared and is not yet ready for public review. The draft EA is scheduled to be posted to the Utah BLM Environmental Notification Bulletin Board (<https://www.blm.gov/ut/enbb/index.php>) on December 20, 2013 for a public review and comments. Comments will be accepted until January 21, 2014.

If you have any additional questions please contact Don Simonis at (435) 587-1513 or email to [dsimonis@blm.gov](mailto:dsimonis@blm.gov).

Sincerely,

*s/ Donald Hoffheins*

Donald K. Hoffheins  
Monticello Field Manager



RECEIVED  
MONTICELLO FIELD OFFICE

13 NOV 25 AM 9:45

DEPT. OF THE INTERIOR  
BUREAU OF LAND MGMT

LeRoy N. Shingoitewa  
CHAIRMAN

Herman G. Honanie  
VICE-CHAIRMAN

November 18, 2013

Donald K. Hoffheins, Field Manager  
Attention: Don Simonis, Archaeologist  
Bureau of Land Management, Monticello Field Office  
P.O. Box 7  
Monticello, Utah 84535

Dear Mr. Hoffheins,

Thank you for your correspondence dated November 8, 2013, in response to our October 9, 2013 letter, regarding the Moab and Monticello Field Offices considering the sale of 53 oil and gas lease parcels on Bureau of Land Management (BLM) lands covering 45,000 acres in February, 2014. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Utah. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties.

Therefore, we appreciate the BLM, Monticello and Moab Field Offices' continuing solicitation of our input and your efforts to address our concerns. We also appreciate our meeting on November 6<sup>th</sup> with representatives of the Moab Field Office including Field Office Manager Beth Ransel, Archaeologists Don Montoya and Aron King, and District Manager Lance Porter and we look forward to our November 20<sup>th</sup> meeting with representatives of the Monticello Field Office.

In our September 10, 2013 letter the Hopi Cultural Preservation Office reiterated that we have repeatedly recommended the BLM not lease parcels with high densities of prehistoric sites, since the co-mingling of energy development and cultural resource protection has been demonstrated to result in indirect and direct adverse effects to cultural resources.

In our October 9, 2013 letter we reviewed the records search and site analysis report of 52 parcels that was completed for the proposed action. We stated we do not support the "one well" assumption in areas of high site densities. The report states that 23 of these parcels are not crossed by existing roads and, "it should be acknowledged that it would be harder to access the

one well while still avoiding archaeological sites, particularly in areas where site density is higher.”

We noted Groups 2 and 6 have high site densities of 62 sites per square mile, and the other eight Groups contain moderately high site densities ranging between 9 and 39 sites per square mile. We also noted that the percentage of acres in the Groups inventoried for cultural resources ranges from a low of 3.9% to a high of 18.3% with only two Groups exceeding 10%.

Therefore, we requested that the parcels identified as Groups 2 and 6 containing high site densities be withdrawn from the February, 2014, lease sale and every subsequent lease sale. We also requested the BLM undertake additional cultural resource survey in areas of high site densities or where the percentage of the area of potential effect previously surveyed is less than 10%. We also reiterated our call to the State Director to adopt a policy whereby Field Offices statewide identify parcels with high densities of prehistoric sites which will be withdrawn from further consideration for leasing.

Your November 8, 2013 letter cites the Monticello and Moab 2008 Resource Management Plans on which we consulted and supported the conservation alternatives and it's identified Areas of Critical Environmental Concern. At our November 6<sup>th</sup> meeting with representatives of the Moab Field Office we again consulted on a Master Leasing Plan for the Field Office that has been proposed for over a year. Why is the BLM then proposing leasing in the Moab Field Office prior to developing the proposed Master Leasing Plan? Any why is the Monticello Field Office not also developing a Master Leasing Plan if the BLM is combining the Field Offices lease sales?

We bring to your attention the enclosed Federal Court Memorandum and Decision regarding BLM compliance with the National Historic Preservation Act which states:

*As in Montana Wilderness...because it only conducted a Class I survey, the BLM has not demonstrated that it conducted a reasonable and good faith inventory of the cultural resources... Therefore the BLM's finding that there were likely no adverse effects...was arbitrary and capricious.*

The Court also found the BLM failed to apply the minimization criteria.

This decision confirms concerns regarding BLM compliance with the National Historic Preservation Act that we have expressed in countless letters for years. Therefore, we hereby request that the BLM comply with the Court's decision not only for the Richfield 2008 Resource Management Plan and Travel Plan but all of its undertakings including this proposed lease sale.

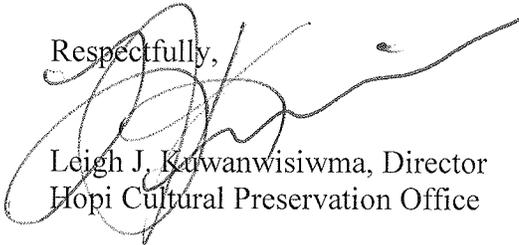
And therefore, we reiterate our request that the parcels identified as Groups 2 and 6 containing high site densities be withdrawn from the February, 2014, lease sale and every subsequent lease sale, that the BLM undertake additional cultural resource survey in areas of

Donald K. Hoffheins  
November 18, 2013  
Page 3

high site densities or where the percentage of the area of potential effect previously surveyed is less than 10%, and our call to the State Director to adopt a policy whereby Field Offices statewide identify parcels with high densities of prehistoric sites which will be withdrawn from further consideration for leasing.

We also reiterate our request to be provided with a copy of the draft environmental assessment for review and comment. If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or [tmorgart@hopi.nsn.us](mailto:tmorgart@hopi.nsn.us). Thank you again for your consideration.

Respectfully,



Leigh J. Kuwanwisiwma, Director  
Hopi Cultural Preservation Office

Enclosure: Federal Court Decision

xc: Juan Palma, BLM State Office; Lance Porter, BLM, District Manager, Moab  
Rose Chilcoat, Great Old Broads for Wilderness, P.O. Box 2924, Durango, CO 81302  
Liz Thomas, Southern Utah Wilderness Alliance, P.O. Box 968, Moab, UT 84532  
Beth Ransel, BLM, Moab Field Office; Center for Native Ecosystems; Utah Rivers Council  
Utah State Historic Preservation Office; Steve Bloch, Southern Utah Wilderness Alliance  
Roger Clark, Grand Canyon Trust; Barbara Pahl, National Trust for Historic Preservation



# UTE MOUNTAIN UTE TRIBE

RECEIVED  
MONTICELLO FIELD OFFICE Towaoc, Colorado 81334-0248

P.O. Box 248

(970) 565-3751

13 NOV 25 AM 9:44

DEPT. OF THE INTERIOR  
BUREAU OF LAND MGMT

November 18, 2013

Donald K. Hoffheins  
Field Manager, Bureau of Land Management  
P.O. Box 7  
Monticello, UT 84535

Re: February 2014 Competitive Oil and Gas Lease Sale Parcels

Dear Mr. Hoffheins:

The Ute Mountain Ute Tribe ("Tribe") received your August 30, 2014 letter regarding the planned Bureau of Land Management ("BLM") February 2014 Competitive Oil and Gas Lease Sale. The Tribe is concerned that the proposed lease parcels are located near the Ute Mountain Ute Tribe's White Mesa Community, and the Tribe is very concerned that some of the proposed parcels are located on<sup>1</sup> or adjacent to lands owned in trust for the Tribe and for Ute Mountain Ute Tribal members living in the White Mesa Community. The Tribe has not been consulted on the potential impacts to Tribal members living on those lands, to important Tribal water, natural, and cultural resources on or near those lands, or to Tribal mineral resources on or near those lands.

Because of the potential for conflict between oil and gas development on BLM lands adjacent to the White Mesa Community and the Indian Trust Assets and other Tribal resources at the White Mesa Community, the Tribe strongly recommends that the BLM remove the six parcels that are on or just adjacent to the White Mesa Community<sup>2</sup> from the February 2014 Competitive Oil and Gas Lease Sale. The Tribe will expect a full consultation with the BLM before BLM offers these parcels for another lease sale. The Tribe also requests that the BLM include consultation with the Tribe on the remaining parcels in the February 2014 Competitive Oil and Gas Lease Sale as soon as possible.

---

<sup>1</sup> The Tribe is concerned that a portion of parcel 155 may be partially located on Tribal land.

<sup>2</sup> These six parcels are marked as 107, 108, 111, 155, 154, and 152 on the map provided with your August 2013 letter.

Please have your office contact Celene Hawkins, Associate General Counsel, at (970) 564-5642 or [chawkins@utemountain.org](mailto:chawkins@utemountain.org) and Lynn Hartman, Tribal Historic Preservation Office Contract Administrator, at (970) 564-6731 or [lhartman@utemountain.org](mailto:lhartman@utemountain.org) with any questions about this letter and to set a time to meet about this important issue.

Sincerely,

A handwritten signature in blue ink that reads "Manuel Heart". The signature is written in a cursive style with a large initial "M".

Manuel Heart  
Chairman

Ute Mountain Ute Tribe

cc: Ute Mountain Ute Tribal Council  
Peter Ortego, General Counsel, Ute Mountain Ute Tribe  
Celene Hawkins, Associate General Counsel, Ute Mountain Ute Tribe  
Terry Knight, Ute Mountain Ute Tribal Historic Preservation Office  
Gordon Hammond, Ute Mountain Ute Energy Department  
Scott Clow, Ute Mountain Ute Environmental Programs Department  
Priscilla Bancroft, Superintendent, Ute Mountain Agency, Bureau of Indian Affairs  
Don Simonis, BLM Archaeologist



THE  
NAVAJO  
NATION

Historic Preservation Department, POB 4950, Window Rock, AZ 86515 • PH: 928.871.7198 • FAX: 928.871.7886

RECEIVED  
MONTICELLO FIELD OFFICE

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DEPT. OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT



BEN SHELLY  
PRESIDENT

REX LEE JIM  
VICE-PRESIDENT

November 7, 2013

Donald K. Hoffheins, Field Manager  
Bureau of Land Management  
Monticello Field Office  
PO Box 7  
Monticello, UT 84535

Dear Mr. Hoffheins:

The Navajo Nation Historic Preservation Department-Traditional Culture Program (NNHPD-TCP) is in receipt of the proposed project regarding the February 2014 Competitive Oil and Gas Lease Sale Parcels, Grand, San Juan Counties, Utah.

After reviewing your consultation documents, NNHPD-TCP has concluded the proposed undertaking/project area **will not impact** Navajo traditional cultural resources. The NNHPD-TCP, on behalf of the Navajo Nation has no concerns at this time.

However, the determination made by the NNHPD-TCP does not necessarily mean that the Navajo Nation has no interest or concerns with the proposed project. If the proposed project inadvertently discovers habitation sites, plant gathering areas, human remains and objects of cultural patrimony, the NNHPD-TCP request that we be notified respectively in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA). *The Navajo Nation claims cultural affiliation to all Anaasazi people (periods from Archaic to Pueblo IV) of the southwest. The Navajo Nation makes this claim through Navajo oral history and ceremonial history, which has been documented as early as 1880 and taught from generation to generations.*

The NNHPD-TCP appreciates the Bureau of Land Management's consultation efforts, pursuant to 36 CFR Pt. 800.1 (c)(2)(iii). Should you have any additional concerns and/or questions do not hesitate to contact me electronically at [tony@navajohistoricpreservation.org](mailto:tony@navajohistoricpreservation.org) or telephone at 928-871-7750.

Sincerely,

Tony H. Joe, Jr., Supervisory Anthropologist (Section 106 Consultation) Navajo Nation Historic Preservation Department-Traditional Culture Program

TCP  
cc: 13-300  
Office File/Chrono



# THE PAIUTE INDIAN TRIBE OF UTAH

440 North Paiute Drive • Cedar City, Utah 84721 • (435) 586-1112

MONTICELLO FIELD OFFICE  
13 SEP 12 AM 10:26

DEPT. OF THE INTERIOR  
BUREAU OF LAND MGMT

September 11, 2013

Donald K. Hoffheins/Field Manager  
United States Department of the Interior  
Bureau of Land Management  
Monticello Field Office  
P.O. Box 7  
Monticello, Utah 85435

Dear Mr. Hoffheins,

**Subject:** *February 2014 Competitive Oil and Gas Lease Sale Parcels*

The Paiute Indian Tribe of Utah is receipt of your letter dated September 6, 2013 and has reviewed the material and do not have any objections pertaining to the above named project. At this time we are not aware of any cultural resource sites, practices, or locations of importance in the Tribe's traditional religion or culture. The tribe supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties.

The Paiute Indian Tribe of Utah sincerely appreciates the consideration and efforts you and your staff have made to consult with the tribes.

Sincerely,

*Dorena Martineau*

Dorena Martineau/Cultural Resources  
Paiute Indian Tribe of Utah

## **Appendix G – Deferred Parcel List**

**List of Lands Recommended for Deferral and Justification**

The UTSO preliminary parcel list contained 105 parcels with 126,749 acres within the CCDO. As determined through the initial interdisciplinary parcel review (IDPR) team screening process, all or portions of 69 parcels are deferred at this time. The reasons for parcel deferral are:

1. **Gunnison Sage grouse Critical Habitat** - The possible listing of the Gunnison sage grouse by the U.S. Fish and Wildlife Service (USFWS) makes it unclear if the Monticello RMP stipulations would be adequate for protection of the species and habitat should listing occur. In accordance with Oil and Gas Leasing Reform (WO-IM-2010-117) it is believed that additional resource information is required prior to leasing in areas of Gunnison sage grouse habitat and this information is not anticipated to be available until a decision is made by the USFWS regarding the listing of the species
2. **Master Leasing Plans** - Some parcels were located within the Moab and Book Cliffs/Divide/Grand Valley/Cisco Desert Master Leasing Plans area. The Oil and Gas Leasing Reform Implementation Plan, September 2012 states “Where MLPs are considered and determined to not be necessary at this time, parcel specific NEPA analysis will be undertaken to consider EOIs and other proposals to lease.” Therefore, any parcels determined to be within the boundary of an MLP area will not be considered for a lease sale pending the completion of the MLP.
3. **Limited Resource Specialist Staffing** - The Moab Field Office has two Natural Resource positions in the oil and gas program. Both positions are currently vacant and due to sequestration will not be filled until after October 1, 2013. There is currently one Natural Resource Specialist in the CCDO. CCDO staffing and priorities do not permit adequate analysis of 105 parcels with 126,749 acres. Because of limited staff and other CCDO priorities the IDPR team performed an initial review based primarily on resource specialist knowledge of the CCDO area. The parcels that would represent the highest potential for resource conflict and consequently, require greater time to conduct an adequate leasing determination analysis were identified and recommended for deferral. Resources identified for the highest potential for conflict are Gunnison sage grouse habitat and cultural resource site density.

After this initial screening process, the CCDO determined that with present staffing and priorities, 49 parcels containing 44,422 acres could be adequately analyzed in this EA. The following table lists the parcels recommended for deferral.

Parcel	Resources Present
<b>UT0214 - 6959 – 006</b> T. 23 S., R. 17 E., Salt Lake Sec. 3: Lots 1-4, S2NE; Secs. 4 and 5: All. 1,578.48 Acres Grand County, Utah Moab Field Office	Moab MLP

Parcel	Resources Present
<p><b>UT0214 - 7006 – 053</b>  T. 16 S., R. 21 E., Salt Lake  Sec. 3: Lots 1-4, S2NE, SE;  Sec. 11: W2NE, NW, NESW;  Sec. 14: W2NW, NWSW;  Sec. 24: NW, N2SW, SWSW;  Sec. 34: SWNW, W2SW.  1,201.88 Acres  Grand County, Utah  Moab Field Office</p>	<p>Limited available staff.</p>
<p><b>UT0214 - 7007 – 054</b>  T. 17 S., R. 21 E., Salt Lake  Sec. 3: All;  Sec. 4: SESE;  Sec. 5: All.  1,223.84 Acres  Grand County, Utah  Moab Field Office</p>	<p>Limited available staff.</p>
<p><b>UT0214 - 7024 – 071</b>  T. 30 S., R. 21 E., Salt Lake  Sec. 33: W2;  Sec. 34: E2, E2W2.  800.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Moab MLP</p>
<p><b>UT0214 - 7025 – 072</b>  T. 30 S., R. 21 E., Salt Lake  Sec. 31: All.  639.36 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Moab MLP</p>
<p><b>UT0214 - 7027 – 074</b>  T. 21 S., R. 22 E., Salt Lake  Secs. 28, 33, 34 and 35: RR ROW  U62502.  38 Acres  Grand County, Utah  Moab Field Office</p>	<p>Portions of this parcel are located within the Book Cliffs Divide-Grand Valley-Cisco Desert Master Leasing Plan. This entire parcel is located on the railroad R-O-W U62502 and leasing this parcel would require a lease stipulation of unconditional no surface occupancy. The Moab RMP contains no such stipulation. Therefore, this parcel is deferred in its entirety.</p>
<p><b>UT0214 - 7031 – 078</b>  T. 27 S., R. 22 E., Salt Lake  Sec. 12: SWNW.  40.00 Acres  San Juan County, Utah  Moab Field Office</p>	<p>Limited available staff</p>

Parcel	Resources Present
<p><b>UT0214 - 7032 – 079</b>  T. 27 S., R. 22 E., Salt Lake  Sec. 13: NWNE, SENE.  80.00 Acres  San Juan County, Utah  Moab Field Office</p>	<p>Limited available staff</p>
<p><b>UT0214 - 7036 – 083</b>  T. 28 S., R. 22 E., Salt Lake  Sec. 1: Lots 1, 5-7, NWSE;  Sec. 12: Lots 1-4, W2NE, E2NW,  NWSE.  579.85 Acres  San Juan County, Utah  Moab Field Office</p>	<p>Limited available staff.</p>
<p><b>UT0214 - 7049 – 096</b>  T. 36 S., R. 22 E., Salt Lake  Sec. 13: Lots 4, 5, 7-9, E2SE.  306.07 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7053 – 100</b>  T. 36 S., R. 22 E., Salt Lake  Sec. 24: All;  Sec. 25: N2, SE.  1,120.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7055 – 102</b>  T. 37 S., R. 22 E., Salt Lake  Sec. 1: Lot 4, SWNW;  Sec. 12: E2NE, NESE;  Sec. 13: NENE, S2NE, SWSW, SE;  Sec. 23: E2NE;  Sec. 24: All;  Sec. 25: E2, E2NW, SW.  1,800.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7063 – 110</b>  T. 38 S., R. 22 E., Salt Lake  Secs. 1, 11 and 12: All;  Sec. 13: N2, SW.  2,395.92 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>

Parcel	Resources Present
<p><b>UT0214 - 7068 – 115</b>  T. 38 S., R. 22 E., Salt Lake  Sec. 24: NE;  Sec. 25: NE.  320.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7070 – 117</b>  T. 15½ S., R. 23 E., Salt Lake  Sec. 33: Lot 1;  Sec. 34: Lots 3, 4, N2SW, SESW.  220.82 Acres  Grand County, Utah  Moab Field Office</p>	<p>Limited available staff.</p>
<p><b>UT0214 - 7083 – 130</b>  T. 31 S., R. 23 E., Salt Lake  Sec. 26: Lot 4, SESW, SWSE;  Sec. 34: E2.  438.66 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Moab MLP</p>
<p><b>UT0214 - 7085 – 132</b>  T. 35 S., R. 23 E., Salt Lake  Sec. 1: SWNE, NWSE, SESE.  120.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Gunnison Sage grouse</p>
<p><b>UT0214 - 7088 – 135</b>  T. 35 S., R. 23 E., Salt Lake  Sec. 16: SESW, S2SE;  Sec. 21: NE, E2SE;  Sec. 22: SESW, NESE, S2SE;  Sec. 23: SENE, S2.  880.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7090 – 137</b>  T. 35 S., R. 23 E., Salt Lake  Sec. 24: NWNE, NENW, S2N2, S2;  Sec. 25: NENE, W2NW, SENW, SW,  SWSE;  Secs. 26 and 35: All.  2,200.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>

Parcel	Resources Present
<p><b>UT0214 - 7091 – 138</b>  T. 35 S., R. 23 E., Salt Lake  Sec. 27: All;  Sec. 28: NENE, SESE;  Sec. 33: SESW;  Sec. 34: NE, E2W2, SWSW, E2SE.  1,200.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7092 – 139</b>  T. 36 S., R. 23 E., Salt Lake  Secs. 1, 12, 13 and 24: All.  2,170.56 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC</p>
<p><b>UT0214 - 7093 – 140</b>  T. 36 S., R. 23 E., Salt Lake  Sec. 3: Lots 1, 2, 4, S2SE;  Sec. 4: Lot 3, S2SW;  Sec. 9: All;  Sec. 10: NE, SW, W2SE;  Sec. 11: N2, SE;  Sec. 14: E2, NENW, S2NW, SW.  2,377.62 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC and NHL</p>
<p><b>UT0214 - 7094 – 141</b>  T. 36 S., R. 23 E., Salt Lake  Sec. 5: Lots 2-4, SWSE;  Sec. 6: Lots 1, 2, SWSE;  Sec. 7: Lot 4, W2NE, SENE, SESW,  NWSE;  Sec. 8: NWNW;  Sec. 17: W2, SE;  Sec. 18: All.  1,582.41 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Recapture Dam and Reservoir</p>
<p><b>UT0214 - 7095 – 142</b>  T. 36 S., R. 23 E., Salt Lake  Secs. 19 and 30: All;  Sec. 31: Lot 1, E2, E2W2.  1,754.10 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>

Parcel	Resources Present
<p><b>UT0214 - 7096 – 143</b>  T. 36 S., R. 23 E., Salt Lake  Secs. 20 and 21: All;  Sec. 28: W2NW, S2;  Sec. 29: All.  2,320.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7097 – 144</b>  T. 36 S., R. 23 E., Salt Lake  Sec. 27: SWSW;  Secs. 34 and 35: All.  1,320.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC</p>
<p><b>UT0214 - 7098 – 145</b>  T. 37 S., R. 23 E., Salt Lake  Sec. 3: Lots 1-4, SENE, S2NW, E2SE;  Sec. 9: SW;  Sec. 11: SW;  Sec. 15: N2.  996.80 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC</p>
<p><b>UT0214 - 7099 – 146</b>  T. 37 S., R. 23 E., Salt Lake  Secs. 18, 19, 30 and 31: All.  2,486.96 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7100 – 147</b>  T. 37 S., R. 23 E., Salt Lake  Sec. 21: S2;  Sec. 22: W2NE;  Sec. 27: N2, SE;  Sec. 28: E2, E2NW.  1,280.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC</p>

Parcel	Resources Present
<p><b>UT0214 - 7101 – 148</b>  T. 37 S., R. 23 E., Salt Lake  Sec. 24: NENW, S2NW;  Sec. 25: NE, S2;  Sec. 35: N2, SE.  1,080.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC</p>
<p><b>UT0214 - 7103 – 150</b>  T. 38 S., R. 23 E., Salt Lake  Secs. 1, 11, 12 and 13: All.  2,559.52 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC</p>
<p><b>UT0214 - 7104 – 151</b>  T. 38 S., R. 23 E., Salt Lake  Sec. 4: Lots 3, 4, S2NW, SW;  Secs. 7 and 8: All;  Sec. 9: W2, SE;  Sec. 10: SW.  2,219.73 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7106 – 153</b>  T. 38 S., R. 23 E., Salt Lake  Sec. 17: All;  Sec. 18: Lots 1, 2, NE, E2NW;  Sec. 19: Lots 1, 2, NE, E2NW;  Secs. 20 and 21: All.  2,544.04 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7109 – 156</b>  T. 39 S., R. 23 E., Salt Lake  Sec. 23: SESE.  40.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>RMP is silent regarding leasing of this 40 ac.  BLM</p>
<p><b>UT0214 - 7117 – 164</b>  T. 15½ S., R. 24 E., Salt Lake  Sec. 35: All.  454.24 Acres  Grand County, Utah  Moab Field Office</p>	<p>Limited available staff.</p>

Parcel	Resources Present
<p><b>UT0214 - 7118 – 165</b>  T. 16 S., R. 24 E., Salt Lake  Sec. 7: Lots 3, 4, E2SW, SE;  Sec. 8: S2;  Secs. 17 and 18: All.  1,889.58 Acres  Grand County, Utah  Moab Field Office</p>	<p>Limited available staff.</p>
<p><b>UT0214 - 7125 – 172</b>  T. 20 S., R. 24 E., Salt Lake  Sec. 5: S2.  320.00 Acres  Grand County, Utah  Moab Field Office</p>	<p>Book Cliffs Divide-Grand Valley-Cisco Desert Master Leasing Plan</p>
<p><b>UT0214 - 7126 – 173</b>  T. 30 S., R. 24 E., Salt Lake  Sec. 5: Lots 3 and 4, S2NW, SW;  Sec. 6: All;  Sec. 8: W2, SE;  Sec. 17: All.  2,226.11 Acres  San Juan County, Utah  Moab Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7127 – 174</b>  T. 30 S., R. 24 E., Salt Lake  Secs. 18, 19 and 20: All.  1,910.70 Acres  San Juan County, Utah  Moab Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7136 – 183</b>  T. 32 S., R. 24 E., Salt Lake  Sec. 19: SESW, SE;  Sec. 20: SW;  Sec. 21: W2;  Sec. 28: N2SW;  Sec. 29: N2S2;  Sec. 30: Lots 1, 2, N2NE, NENW;  Sec. 33: SE.  1,267.76 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>

Parcel	Resources Present
<p><b>UT0214 - 7137 – 184</b>  T. 32 S., R. 24 E., Salt Lake  Sec. 24: NENE, S2NE;  Sec. 25: All;  Sec. 26: E2NE, W2SW, SE;  Sec. 27: S2SE;  Sec. 34: E2, SESW;  Sec. 35: E2, W2SW, SESW.  1,960.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7138 – 185</b>  T. 33 S., R. 24 E., Salt Lake  Sec. 5: SESE;  Sec. 7: SESE;  Sec. 9: W2NE, SENE, NW.  360.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7139 – 186</b>  T. 33 S., R. 24 E., Salt Lake  Sec. 34: NWSW, SESW, SWSE.  120.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7140 – 187</b>  T. 34 S., R. 24 E., Salt Lake  Sec. 3: Lot 3, SWNW;  Sec. 12: N2NE, SESW.  200.15 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7141 – 188</b>  T. 34 S., R. 24 E., Salt Lake  Sec. 29: S2SW;  Sec. 30: SESW, SWSE;  Sec. 31: S2NE, SENW, NESE.  320.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>

Parcel	Resources Present
<p><b>UT0214 - 7142 – 189</b>  T. 34 S., R. 24 E., Salt Lake  Sec. 25: SWNE, SWNW;  Sec. 26: W2, W2E2, SENE;  Sec. 35: W2NE, W2, SE.  1,160.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7143 – 190</b>  T. 35 S., R. 24 E., Salt Lake  Sec. 1: Lots 3, 4, S2NW, SW, S2SE;  Sec. 3: Lots 1, 3, SENE, E2SE;  Sec. 10: E2;  Sec. 11: Lots 1-4, E2, E2NW;  Sec. 12: All.  2,119.85 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7144 – 191</b>  T. 35 S., R. 24 E., Salt Lake  Sec. 5: Lots 2 and 3, SENE;  Sec. 6: Lot 7;  Sec. 8: SENE, S2SE;  Sec. 9: SWNW, SW, SWSE.  518.41 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7145 – 192</b>  T. 35 S., R. 24 E., Salt Lake  Sec. 13: All;  Sec. 14: E2;  Sec. 23: All;  Sec. 24: N2, SW, N2SE.  2,160.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7146 – 193</b>  T. 35 S., R. 24 E., Salt Lake  Sec. 14: W2W2;  Secs. 15, 21 and 22: All.  2,086.16 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Critical Sage grouse Habitat</p>

Parcel	Resources Present
<p><b>UT0214 - 7147 – 194</b>  T. 35 S., R. 24 E., Salt Lake  Sec. 17: NE, S2;  Sec. 18: Lots 1-3, S2NE, SENW,  E2SW, SE;  Sec. 19: Lot 4, E2, NENW, SESW;  Sec. 20: All.  2,037.16 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7148 – 195</b>  T. 35 S., R. 24 E., Salt Lake  Sec. 25: S2NE, W2, SE;  Secs. 26 and 35: All.  1,840.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7149 – 196</b>  T. 35 S., R. 24 E., Salt Lake  Secs. 27 and 28: All;  Sec. 33: N2N2, SENE, SWNW,  SWSW, NESE;  Sec. 34: All.  2,240.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7150 – 197</b>  T. 35 S., R. 24 E., Salt Lake  Sec. 29: All;  Sec. 30: Lots 2-4, E2, E2W2;  Sec. 31: All.  1,879.06 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density</p>
<p><b>UT0214 - 7152 – 199</b>  T. 36 S., R. 24 E., Salt Lake  Secs. 6, 7 and 18: All.  1,484.64 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC</p>

Parcel	Resources Present
<p><b>UT0214 - 7153 – 200</b>  T. 36 S., R. 24 E., Salt Lake  Secs. 17, 19 and 20: All.  1,901.68 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC</p>
<p><b>UT0214 - 7154 – 201</b>  T. 36 S., R. 24 E., Salt Lake  Sec. 24: SW;  Sec. 28: SW;  Sec. 33: NE;  Sec. 34: All;  Sec. 35: W2E2NWNW, W2NWNW,  S2NW, S2.  1,550.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Cultural Site Density, Alkali Ridge ACEC</p>
<p><b>UT0214 - 7160 – 207</b>  T. 32 S., R. 25 E., Salt Lake  Sec. 17: S2NE, SENW, E2SW,  N2SE, SWSE;  Sec. 18: Lot 4, S2NE, E2SW,  W2SE;  Sec. 20: W2;  Sec. 30: Lots 1-4, E2W2.  1,221.53 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7161 – 208</b>  T. 32 S., R. 25 E., Salt Lake  Sec. 20: NESE;  Sec. 21: All;  Sec. 22: SW;  Sec. 27: NENE, W2E2, SENW, E2SW;  Sec. 28: W2;  Sec. 29: All.  2,120.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>

Parcel	Resources Present
<p><b>UT0214 - 7162 – 209</b>  T. 33 S., R. 25 E., Salt Lake  Sec. 1: Lots 2-4, SWNE, S2NW,  NWSE.  281.12 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7163 – 210</b>  T. 33 S., R. 25 E., Salt Lake  Sec. 19: Lots 1-4;  Sec. 20: NENE;  Sec. 21: NWNW.  229.20 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7164 – 211</b>  T. 33 S., R. 25 E., Salt Lake  Sec. 34: E2E2;  Sec. 35: W2SW, SESW.  280.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7165 – 212</b>  T. 34 S., R. 25 E., Salt Lake  Sec. 35: SESE.  40.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7166 – 213</b>  T. 35 S., R. 25 E., Salt Lake  Sec. 3: N2SW;  Sec. 9: SWNW.  120.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7172 – 219</b>  T. 32 S., R. 26 E., Salt Lake  Sec. 19: N2SE;  Sec. 20: SWSW;  Sec. 31: N2.  440.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>

Parcel	Resources Present
<p><b>UT0214 - 7173 – 220</b>  T. 33 S., R. 26 E., Salt Lake  Sec. 3: S2NW, N2SW;  Sec. 4: S2NE, SWNW, S2;  Sec. 5: Lots 2-4, S2N2, S2;  Sec. 6: Lots 1, 2, S2NE, N2S2;  Sec. 9: N2NE, SWNE, NENW;  Sec. 10: S2NW.  1,769.83 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7174 – 221</b>  T. 33 S., R. 26 E., Salt Lake  Sec. 8: SE;  Sec. 14: Lots 3 and 4;  Sec. 15: SWNE, NW;  Sec. 17: NE;  Sec. 20: SW, W2SE, SESE;  Sec. 21: NE, S2NW;  Sec. 22: W2NW;  Sec. 26: Lots 3 and 4;  Sec. 29: NWNE, SENE, N2NW;  Sec. 35: Lot 1.  1,398.31 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7175 – 222</b>  T. 35 S., R. 26 E., Salt Lake  Sec. 3: Lot 2;  Sec. 4: NWSW.  80.14 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>
<p><b>UT0214 - 7176 – 223</b>  T. 35 S., R. 26 E., Salt Lake  Sec. 7: S2N2;  Sec. 8: NWNE, S2NW.  280.00 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>Critical Sage grouse Habitat</p>

Parcel	Resources Present
<p><b>UT0214 - 7178 – 225</b>  T. 36 S., R. 26 E., Salt Lake  Sec. 27: Lots 3, 4, W2SE.  141.48 Acres  San Juan County, Utah  Monticello Field Office</p>	<p>This parcel contains private surface. The surface owner information provided in the expression of interest was erroneous. The actual owner sent by email a letter of objection to the inclusion of the subject private surface in the lease sale citing inaccurate split estate private owner information. To defer only the split estate private surface for this parcel would affect the cultural analysis. Therefore, this entire parcel is deferred.</p>