



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

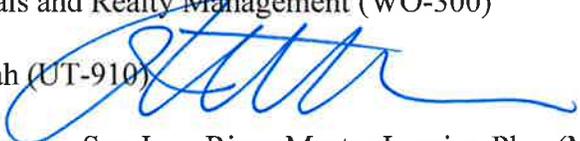
Utah State Office
440 West 200 South, Suite 500
Salt Lake City, UT 84101-1434
<http://www.blm.gov/ut/st/en.html>

In Reply Refer To:
3100 (UT920)

AUG 20 2015

Memorandum

To: Assistant Director, Minerals and Realty Management (WO-300)

From: Acting State Director, Utah (UT-910) 

Subject: Revisions to the Glen Canyon – San Juan River Master Leasing Plan (MLP)

This memorandum revises and supersedes the memorandum issued by this office on May 29, 2015, with the subject of “Revisions to the Glen Canyon – San Juan River MLP.”

In accordance with the Bureau of Land Management (BLM) Utah State Office’s continued priority to effectively and efficiently implement the BLM’s Oil and Gas Leasing Reform efforts, I have elected to utilize the discretion afforded to State Directors in the BLM’s Planning for Fluid Mineral Resources Manual (H – 1624-1) to both re-title and revise the planning area boundary for the approved Glen Canyon – San Juan River MLP for public lands and subsurface mineral estate administered by the BLM Canyon Country District, Monticello Field Office. I have taken these actions because they will more effectively communicate the MLP planning area to the public, provide for a more efficient use of BLM-Utah’s resources, and more comprehensively address BLM’s MLP criteria established in Manual H – 1624-1.

Re-titling as the “San Juan MLP”

Originally titled the *Glen Canyon – San Juan River MLP* in 2011, this MLP title is not representative of the planning effort’s geographic focus. Since the entire planning area is located within San Juan County, Utah, simply retitling this MLP as the *San Juan MLP* will immediately provide public land stakeholders with a better frame of reference for the MLP’s geographic scope. All future documentation associated with this planning effort will now refer to the “*San Juan MLP*.”

Revising the San Juan MLP Planning Area

The BLM Director approved BLM-Utah’s Leasing Reform Implementation Plan on February 16, 2011, which included a 651,232-acre planning area for the San Juan MLP (Map 2). In a memo dated September 23, 2013, the Utah State Director notified the Assistant Director for Minerals and Realty Management (WO-300) that BLM-Utah had modified the San Juan MLP planning area to encompass a total of 364,151 acres (Map 3). The 2013 reduction of 287,081 acres from the 2011 MLP planning area involved the removal of surface, subsurface, and non-BLM

acreages between U.S. Route 191 and the Utah-Colorado border, as well as the addition of surface and subsurface acres west of U.S. Route 191 and north of the San Juan River. This memo serves as notification that the 2011 eastern boundary of the San Juan MLP planning area has been restored. The MLP planning area will encompass all acres that were previously included in the 2011 and 2013 MLP planning areas, totaling 765,372 acres (Map1).

BLM-Utah, Canyon Country District San Juan MLP Planning Area			
Year	2011	2013	2015
BLM Surface Acreage	468,654	293,088	568,643
BLM Split Estate Acreage	33,137	7,204	33,137
Non-BLM Acreage	149,441	63,859	163,592
Total Acreage	651,232	364,151	765,372

This memo primarily explains why the re-integration of the 400,671 acres between U.S. Route 191 and the Colorado border that were removed from the planning area in 2013 is again appropriate and does not repeat the justifications previously made in BLM-Utah’s 2011 Leasing Reform Implementation Plan and the 2013 memo to the WO-300 Assistant Director for including or not including other acreages.

BLM’s MLP Criteria from the Planning for Fluid Mineral Resources Manual (H – 1624-1):

- 1. A substantial portion of the Federal lands in the MLP area is not currently leased.*

The San Juan MLP will meet this criterion with the additional acreage being re-integrated into the planning area. Within the 400,671 acres being re-integrated, BLM administers fluid mineral leasing across 301,488 surface and subsurface acres. Within these 301,488 acres, approximately 56%, or 161,000 acres, is not currently leased. These unleased lands are dispersed throughout the 400,671-acre MLP planning area expansion (Map 4).

A total of 8,430 acres of leased parcels within the expanded planning area have been suspended administratively or under court order. Three leased parcels within the planning area have been suspended by the U.S. District Court of Utah and are a part of the “Kimball suspensions.”¹ The court found that further analysis under the National Environmental Policy Act (NEPA) to consider potential impacts to lands with wilderness characteristics was required before BLM can address the suspensions on three leases (Map 4). The lawsuit also included allegations that BLM violated the National Historic Preservation Act (NHPA) when issuing the leases; however, the court did not provide a definitive ruling on this matter. The San Juan MLP would provide an ideal opportunity for complying with court direction by completing “curative NEPA” that would resolve the leasing status for the suspended leases.

- 2. There is a majority Federal mineral interest in the MLP area.*

The San Juan MLP will continue to meet this criterion with the additional acreage being re-integrated into the planning area. No changes in the Federal government’s mineral interests

¹ Three federal court decisions rendered by Judge Dale A. Kimball led to the suspension of numerous oil and gas leases across the state of Utah (see *SUWA v. Norton* 2:04 CV574[DAK], 2:08CV0064[DAK], and 2:06CV342[DAK]. These cases have come to be informally known as the “Kimball Suspensions.”

have occurred since the BLM-Utah's 2011 Leasing Reform Implementation Plan or the 2013 memo to the Assistant Director.

3. *The oil and gas industry has expressed a specific interest in leasing in the MLP area demonstrated through discussions, expressions of interest, or existing leases in the area, and there is a moderate or high potential for oil or gas confirmed by the discovery of oil or gas in the general area.*

The San Juan MLP will continue to meet this criterion with the additional acreage being re-integrated into the planning area. Within the 400,671 acres being re-integrated, the BLM Monticello Field Office administers fluid mineral leasing across 301,488 surface and subsurface acres. Within these 301,488 acres, the following criteria apply:

- BLM-Utah received expressions of interest across 183,874 acres for the Canyon Country District's 2014 (82,250 acres), 2015 (43,522 acres), and 2016 (58,1012 acres) quarterly oil and gas lease sales (Map 5);
- Approximately 46% of the federal mineral estate, or 140,500 acres, is encumbered by authorized (133,016 acres) or pending (7,512 acres) leases (Map 4);
- The entire area maintains a moderate to high potential for oil and gas (Map 6). The existence of some fully operational oil and gas developments; the BLM's own determinations of oil and gas potential; and the private sector's continued expressions of interest across substantial portions of the expanded planning area increase the likelihood that additional oil and gas discoveries could be made.

4. *Additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur where there are multiple use or natural resource conflicts, impacts to air quality, impacts on the resources or values of any unit of the National Park System or National Wildlife Refuge or a National Forest System wilderness area, or impacts on other specially designated areas.*

The San Juan MLP will continue to meet this criterion with the additional acreage being re-integrated into the planning area. Since 2012, BLM-Utah has deferred a total of 247,645 acres of proposed leases within the 400,671-acre planning area expansion for a variety of potential resource impacts described below.

BLM-Utah has been provided with new information during the Canyon Country District's 2014 and 2015 quarterly oil and gas lease sale processes. This new information regarding potential resource impacts from oil and gas development has primarily come through lease sale protests from a variety of public lands stakeholders, including the National Park Service, National Parks Conservation Association, Natural Resources Defense Council, National Trust for Historic Preservation, WildEarth Guardians, Grand Canyon Trust, Rocky Mountain Wild, Southern Utah Wilderness Alliance (SUWA), and Utah Rock Art Research Association. These stakeholders formally protested 44 parcels, and BLM-Utah deferred a total of 106,394 acres from the 2014 and 2015 quarterly lease sales after determining that additional analysis was necessary to address the issues described below (Maps 7 and 8).

The San Juan MLP will provide an ideal opportunity to determine whether possible direct, indirect, and cumulative resource impacts from potential fluid mineral development warrant

amending any oil and gas leasing decisions made in the 2008 Monticello Field Office Resource Management Plan (Map 9).

BLM-Utah, Canyon Country District		
Acreages of Oil and Gas Leasing Decisions on BLM-Administered Surface and Subsurface from the 2008 Monticello Field Office RMP within the San Juan MLP Planning Area		
Leasing Decisions	2015 MLP Planning Area Expansion	Total 2015 MLP Planning Area
Open with Standard Stipulations	161,741	279,385
Open with Timing Limitations	69,683	174,038
Open with Controlled Surface Use Limitations	7,769	7,778
Open with Timing and Controlled Surface Use Limitations	31,035	42,773
Open with No Surface Occupancy Limitations	4,409	37,914
Closed	0	25,672

Multiple-use or natural/cultural resource conflicts:

Cultural Resources: The planning area for the San Juan MLP is known to contain significant prehistoric archaeological resources. Not surprisingly, the potential impacts to these resources from fluid mineral development have been a focal point for several oil and gas lease sale protests of proposed lease parcels within the MLP. These protests have identified several cultural resource sites and landscapes within the MLP planning area that could be impacted by oil and gas development, including those located in or near Alkali Ridge, the Montezuma Creek watershed, and the San Juan River. During recent oil and gas lease sales, BLM-Utah has deferred several proposed lease parcels within the MLP boundary because of determinations that additional analysis was needed in order to assess and address the potential impacts of oil and gas leasing on cultural resources.

In light of the extraordinary cultural resources within the planning area for the San Juan MLP and the associated concerns that those resources could be adversely impacted by oil and gas development, as a part of a landscape-level cultural resources inventory and mitigation strategy, BLM-Utah will complete a “Class I” and “Class II” cultural resources inventories within the planning area for the San Juan MLP. BLM Utah plans to begin conducting these cultural resources inventories in the late summer or early fall of 2015. Once complete, these cultural resources inventories will help BLM to better understand and characterize the density and distribution of the cultural resources within the San Juan MLP planning area, which will assist the Bureau in making well-informed and timely oil and gas leasing decisions in the future.

The development of the San Juan MLP and its associated NEPA and NHPA public processes would seem to provide an ideal forum for resolving landscape-level cultural resource considerations with BLM-Utah’s tribal and archaeological stakeholders. The development of the MLP would also ensure that any potential NHPA issues associated with the three “Kimball suspension” lease parcels are adequately addressed.

Lands with Wilderness Characteristics: In October 2014, BLM received public comments on the 2015 oil and gas sale that included new wilderness characteristics inventory information for

two inventory units totaling 33,147 acres within the expanded planning area. The BLM-Utah has not yet considered this new inventory information in accordance with BLM Manual 6310 to determine whether wilderness characteristics exist. The development of the MLP would also ensure that NEPA and wilderness characteristics issues associated with the three “Kimball suspension” lease parcels are adequately addressed.

Impacts on the resources or values of a unit of the National Park System, national wildlife refuge, or National Forest wilderness area, as determined after consultation or coordination with the National Park Service (NPS), Fish and Wildlife Service (FWS), or Forest Service:

Hovenweep National Monument: Parcels near the National Park Service’s Hovenweep National Monument were protested and deferred in the 2015 Canyon Country District oil and gas lease sale due to potential impacts to night sky resources from fluid mineral development. In 2014, Hovenweep received International Dark Sky Park certification. Although the 2008 BLM Monticello Field Office Resource Management Plan discussed “nighttime lighting,” it did not adequately address this issue.

Impacts on other specially designated areas.

Areas of Critical Environmental Concern (ACEC): The Alkali Ridge and Hovenweep ACECs and a small portion of the San Juan River ACEC totaling 45,929 acres are all located within the expanded San Juan MLP planning area. These ACECs were designated in the 2008 Monticello Field Office RMP to protect relevant and important cultural, wildlife, scenic, ecological, and geologic resource values. The ACECs are all currently open to oil and gas leasing with either controlled surface use or no surface occupancy limitations. The development of the San Juan MLP would provide an opportunity to revisit leasing decisions and ensure associated limitations remain appropriate for the protection of the ACECs’ relevant and important values in light of additional Class I and II cultural resource inventories initiated this year. Many of the cultural resource impact issues identified by those protesting the Canyon Country District’s 2015 oil and gas lease sale were located outside of these ACEC boundaries.

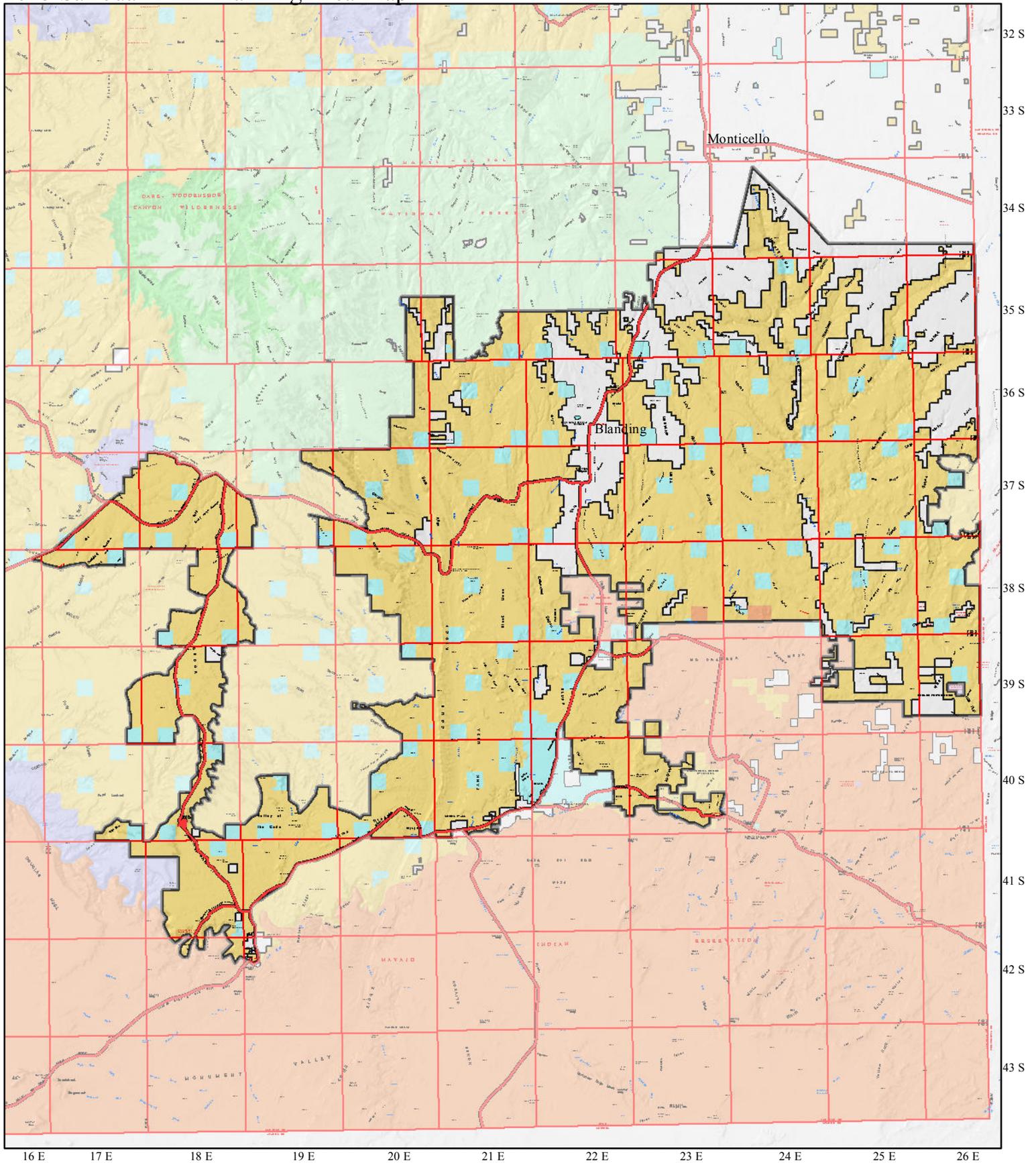
Alkali Ridge National Historic Landmark: This 2,146-acre National Historic Landmark was designated in 1964 and is located within the Alkali Ridge ACEC. The Landmark is currently open to oil and gas leasing with no surface occupancy limitations. The San Juan MLP would provide an opportunity to ensure that potential impacts to the Landmark’s broader cultural resource landscape are properly considered.

For the reasons described above, I have utilized the discretion provided to State Directors in the BLM’s Planning for Fluid Mineral Resources Manual (H – 1624-1) to revise the San Juan MLP planning area boundary. If you need additional information, please contact Kent Hoffman, BLM-Utah’s Deputy State Director for Lands and Minerals, at (801) 539-4080 or Pam Jarnecke, BLM-Utah’s Branch Chief, Planning and Environmental Coordination, at (801) 539-4066.

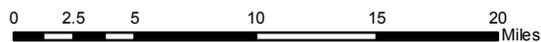
Attachments (9):

- Map 1 – 2015 San Juan MLP Planning Area
- Map 2 – 2011 San Juan MLP Planning Area
- Map 3 – 2013 San Juan MLP Planning Area
- Map 4 – Oil and Gas Leasing Status within the San Juan MLP Planning Area
- Map 5 – Expressions of Interest within the San Juan MLP Planning Area Since 2011
- Map 6 – Oil and Gas Potential within the San Juan MLP Planning Area
- Map 7 – Deferred Parcels within the San Juan MLP Planning Area
- Map 8 – Potential Resource Impacts within the San Juan MLP Planning Area
- Map 9 – 2008 Monticello RMP Oil and Gas Leasing Decisions within the San Juan MLP Planning Area

2015 San Juan MLP Planning Area Map



This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

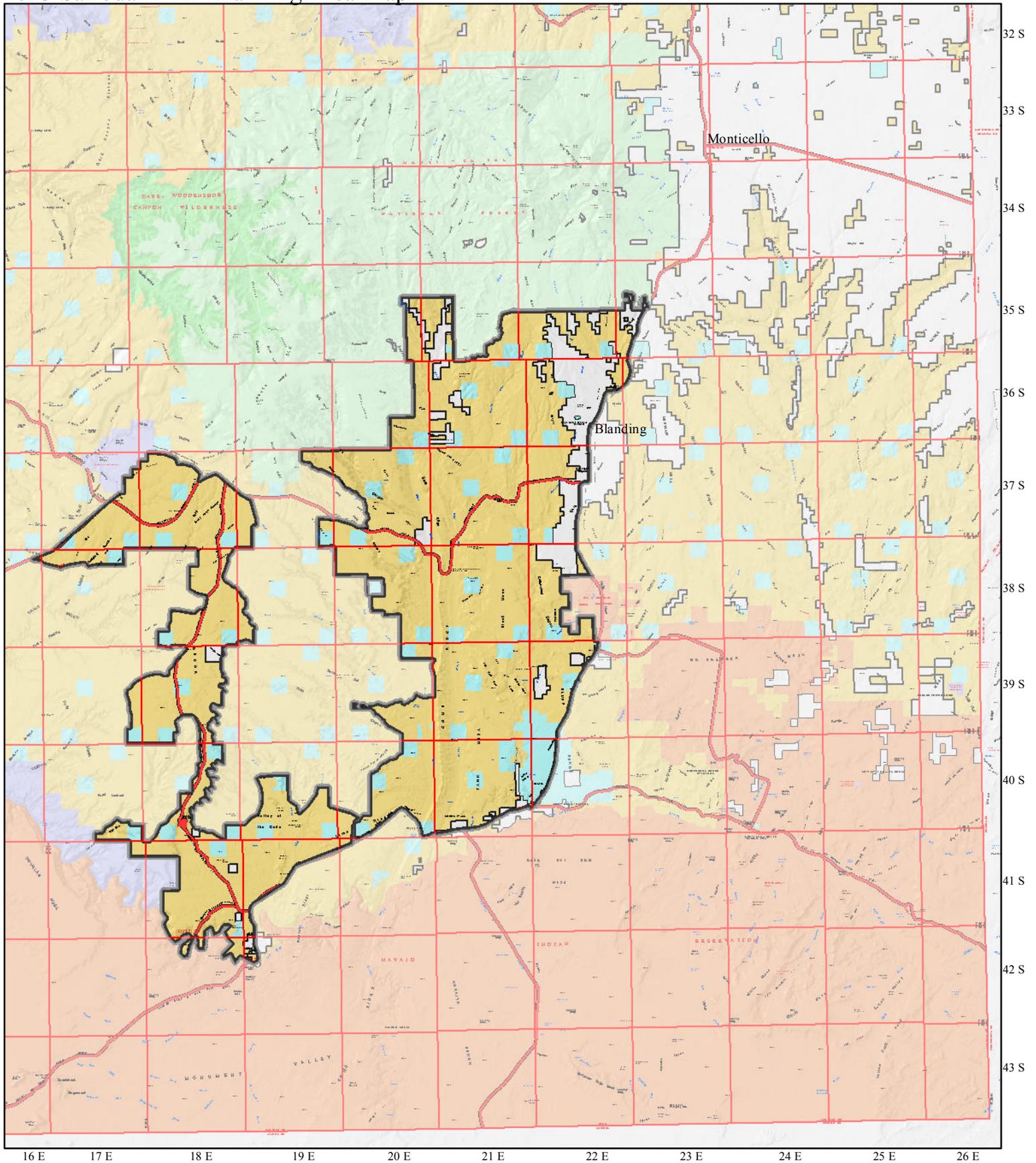


Legend

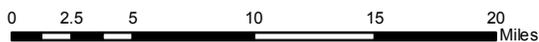
- State Highways
- PLS Township
- San Juan MLP 2015
- Bureau of Land Management (BLM)
- Indian Reservation (IR)
- National Park Service (NPS)
- Private
- State
- State Parks and Recreation
- US Forest Service (USFS)
- USFS Wilderness Area



2013 San Juan MLP Planning Area Map



This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

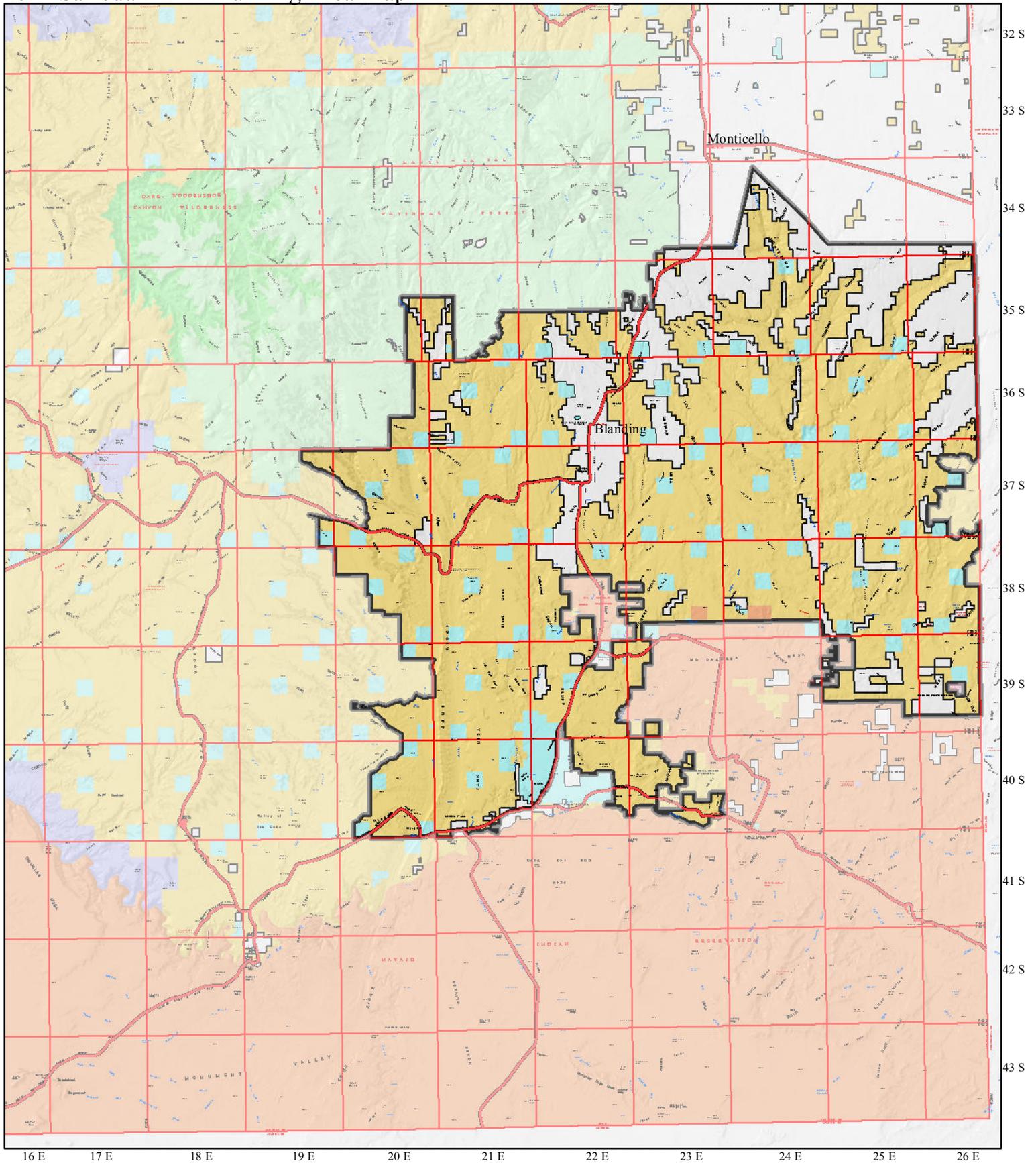


Legend

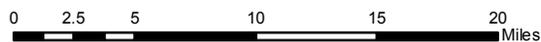
- PLSStownship
- San Juan MLP 2013
- StateHighways
- Bureau of Land Management (BLM)
- Indian Reservation (IR)
- National Park Service (NPS)
- Private
- State
- State Parks and Recreation
- US Forest Service (USFS)
- USFS Wilderness Area



2011 San Juan MLP Planning Area Map



This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

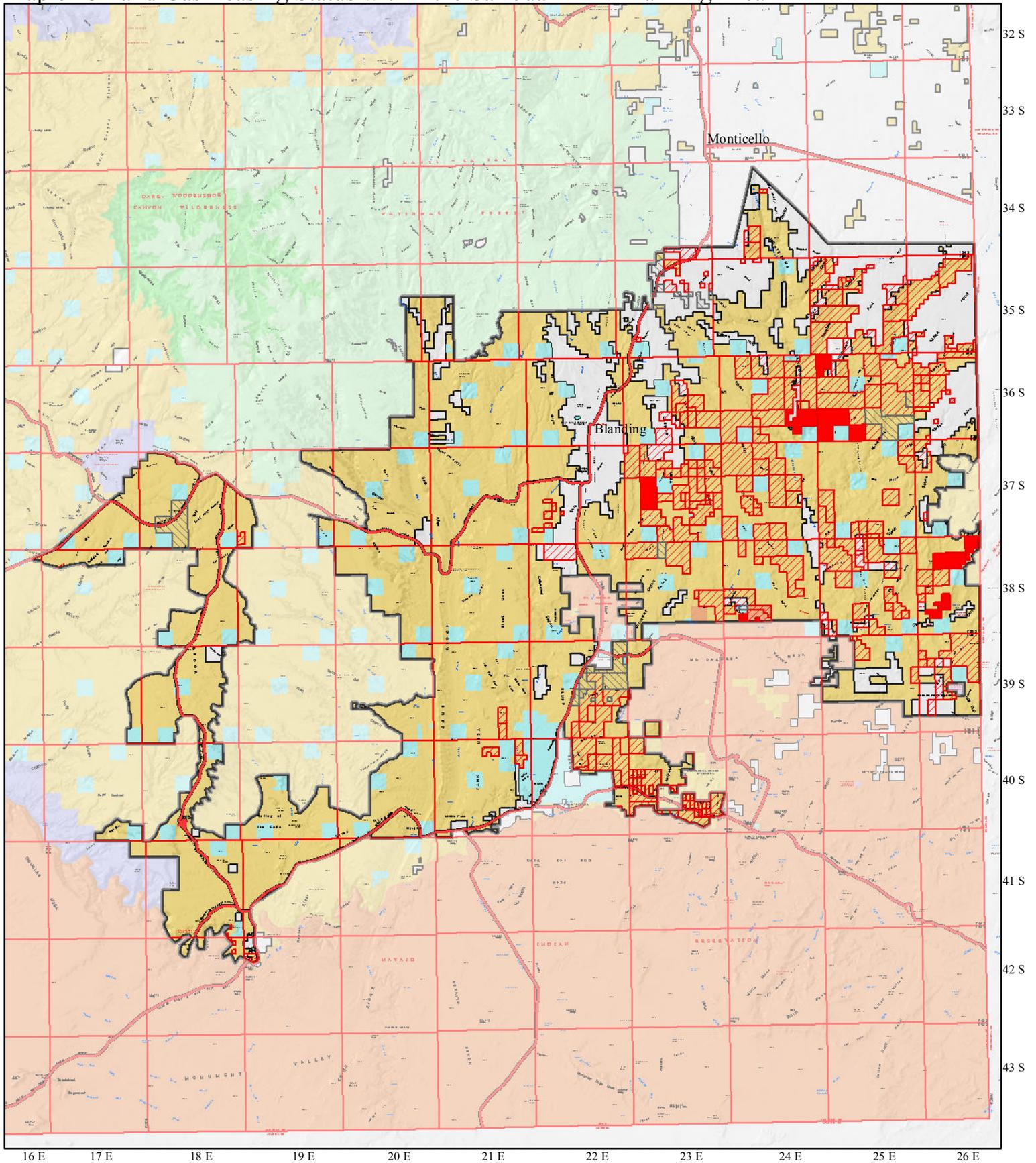


Legend

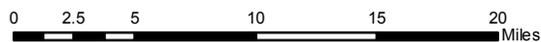
- State Highways
- PLS Township
- San Juan MLP 2011
- Bureau of Land Management (BLM)
- Indian Reservation (IR)
- National Park Service (NPS)
- Private
- State
- State Parks and Recreation
- US Forest Service (USFS)
- USFS Wilderness Area



Map of Oil and Gas Leasing Status within the San Juan MLP Planning Area



This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

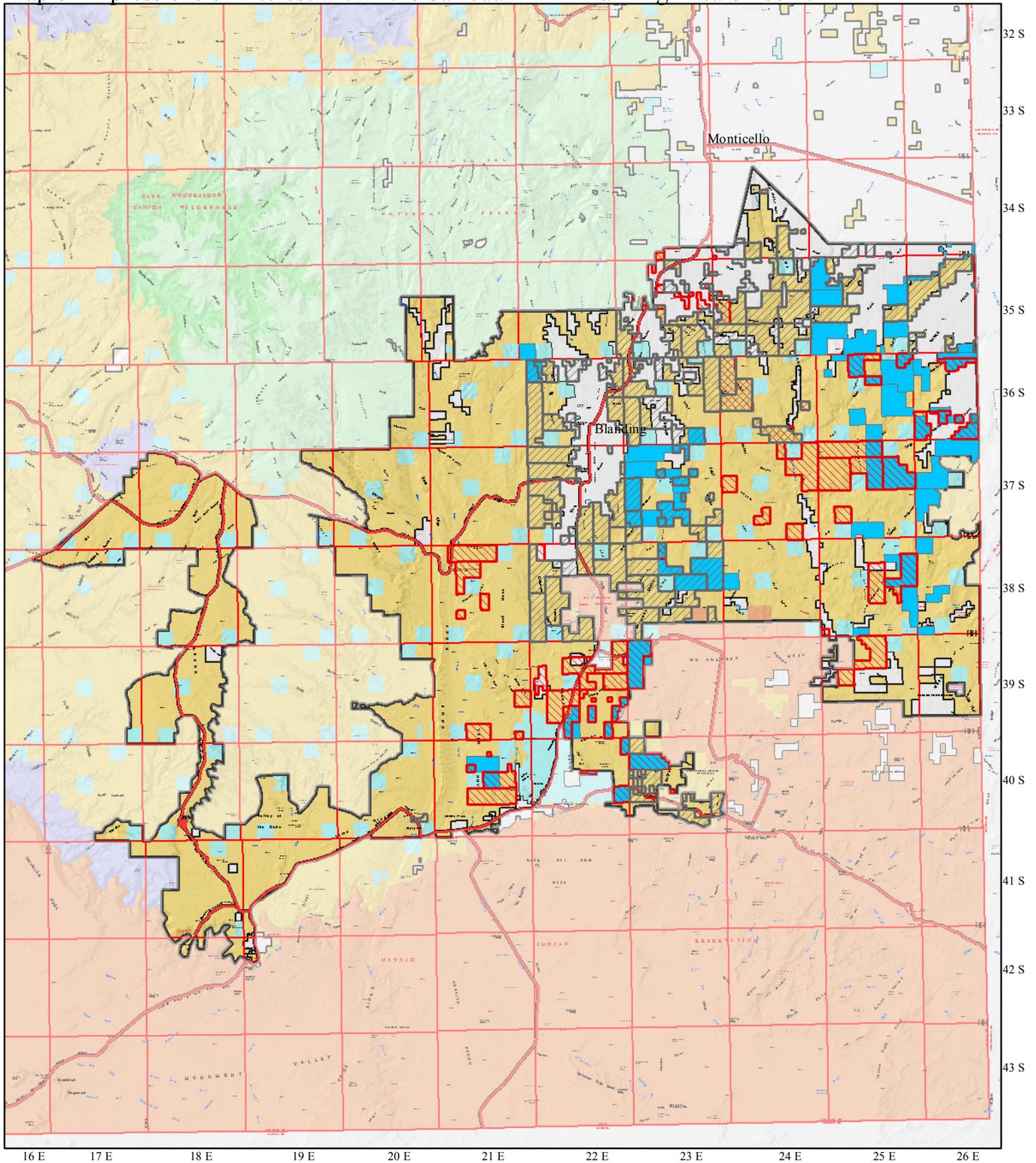


Legend

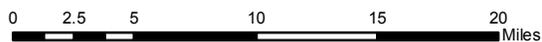
- | | |
|---------------------------------|-----------------------------|
| Authorized | Indian Reservation (IR) |
| Pending | National Park Service (NPS) |
| Suspended Leases | Private |
| State Highways | State Parks and Recreation |
| PLS Stowship | US Forest Service (USFS) |
| San Juan MLP 2015 | USFS Wilderness Area |
| Bureau of Land Management (BLM) | |



Map of Expressions of Interest within the San Juan MLP Planning Area Since 2014



This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

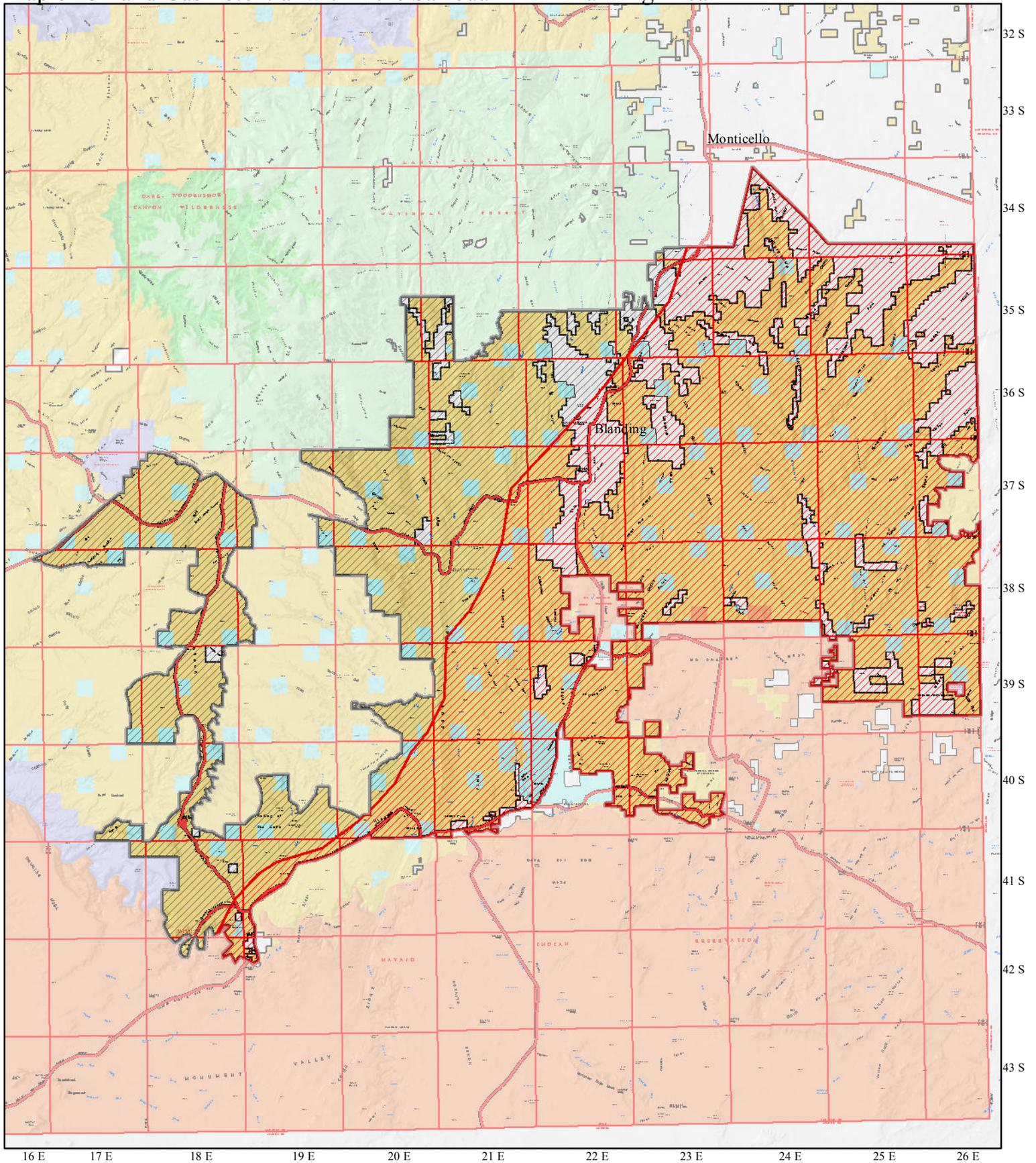


Legend

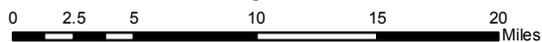
- | | | | |
|--|---------------------------------|--|-----------------------------|
| | 2014 Expressions of Interest | | Indian Reservation (IR) |
| | 2015 Expressions of Interest | | National Park Service (NPS) |
| | 2016 Expressions of Interest | | Private |
| | State Highways | | State |
| | PLS Stowship | | State Parks and Recreation |
| | San Juan MLP 2015 | | US Forest Service (USFS) |
| | Bureau of Land Management (BLM) | | USFS Wilderness Area |



Map of Oil and Gas Potential within the San Juan MLP Planning Area



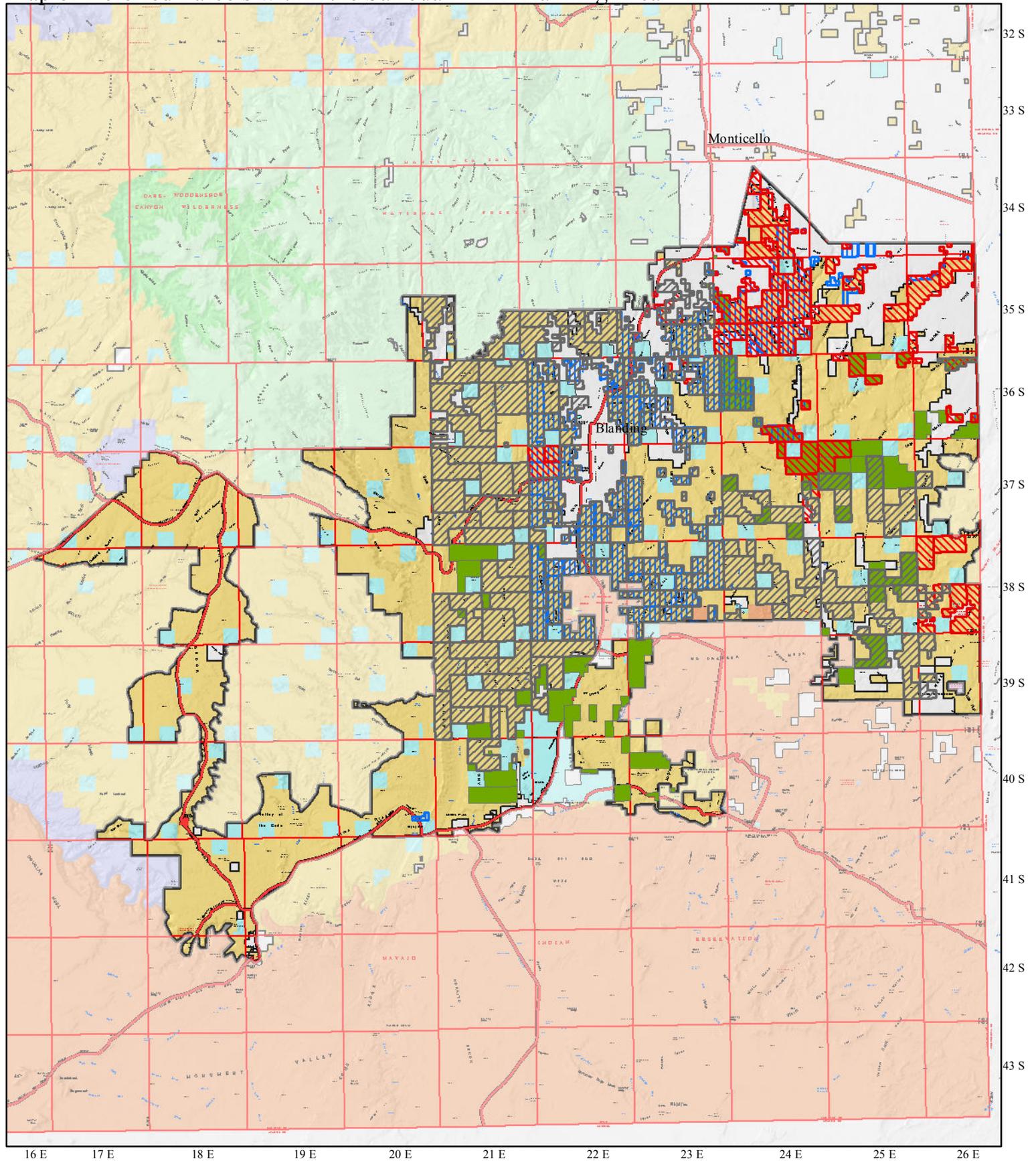
This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.



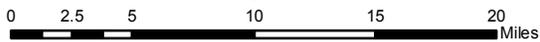
Legend

- High Development Potential for Oil and Gas
- Moderate Development Potential for Oil and Gas
- State Highways
- PLSStownship
- San Juan MLP 2015
- Bureau of Land Management (BLM)
- Indian Reservation (IR)
- National Park Service (NPS)
- Private
- State
- State Parks and Recreation
- US Forest Service (USFS)
- USFS Wilderness Area

Map of Deferred Parcels within the San Juan MLP Planning Area



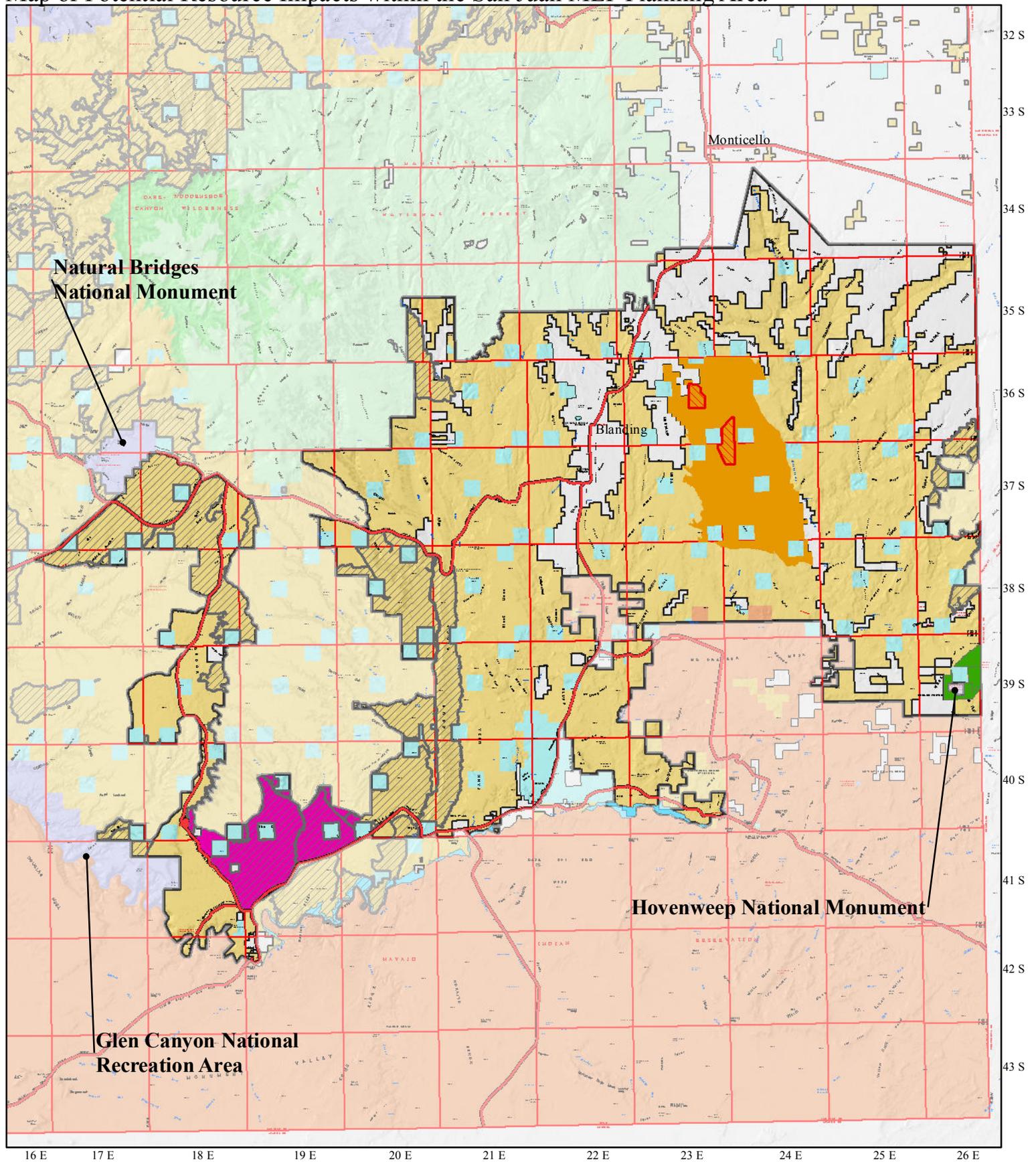
This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.



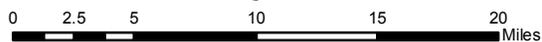
Legend

- deferred 2012
- deferred 2013
- deferred 2014
- deferred 2015
- State Highways
- PLSS township
- San Juan MLP 2015
- Bureau of Land Management (BLM)
- Indian Reservation (IR)
- National Park Service (NPS)
- Private
- State Parks and Recreation
- US Forest Service (USFS)
- USFS Wilderness Area

Map of Potential Resource Impacts within the San Juan MLP Planning Area

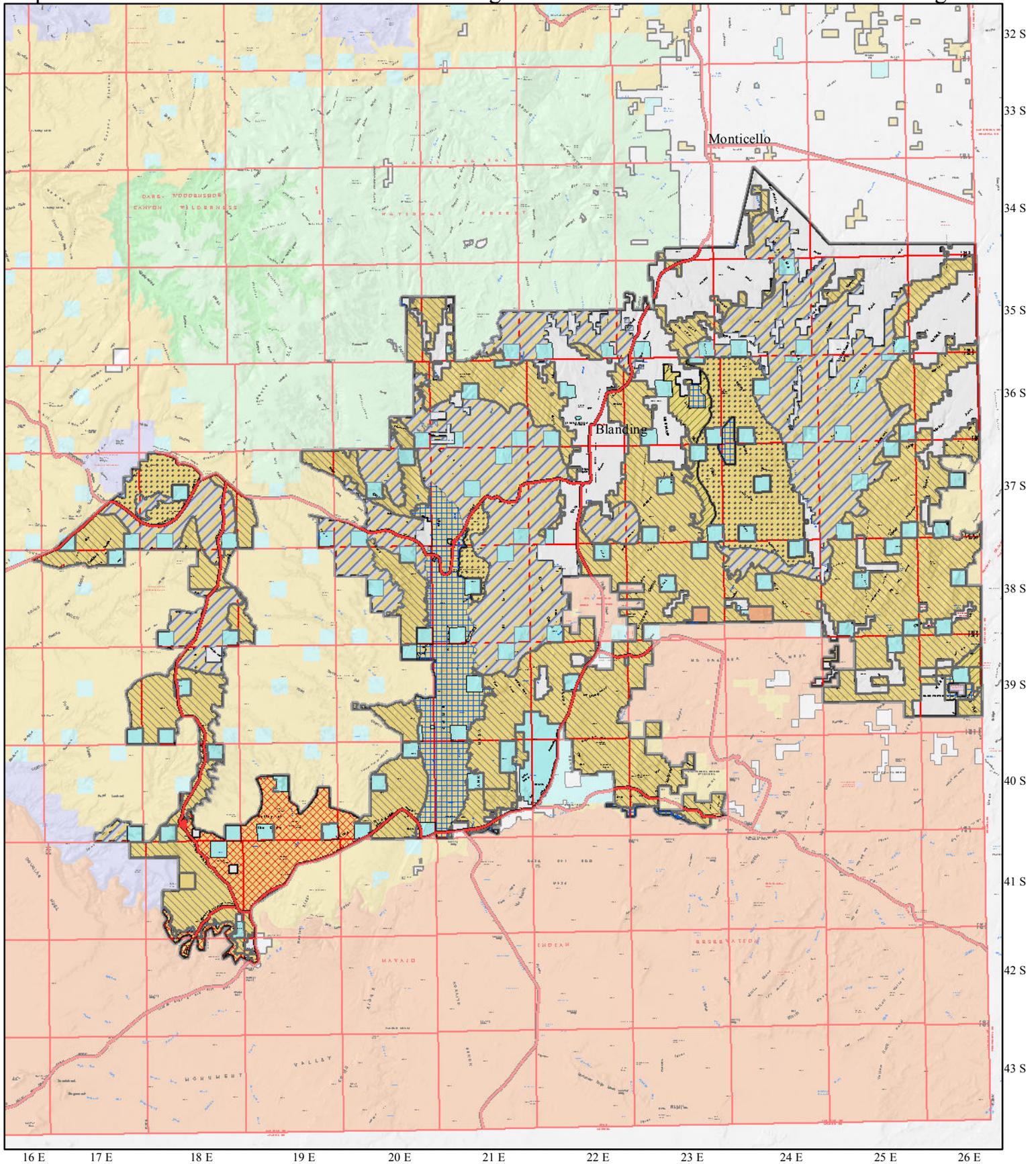


This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.

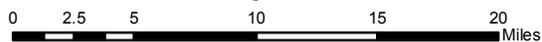


- | | |
|---------------------------------|-----------------------------|
| State Highways | Indian Reservation (IR) |
| Lands with Wilderness Character | National Park Service (NPS) |
| Alkali Ridge NHL | Private |
| Alkali Ridge ACEC | State |
| Hovenweep ACEC | State Parks and Recreation |
| San Juan River ACEC | US Forest Service (USFS) |
| Valley of the Gods ACEC | USFS Wilderness Area |
| PLS Stowship | |
| San Juan MLP 2015 | |
| Bureau of Land Management (BLM) | |

Map of 2008 Monticello RMP Oil and Gas Leasing Decisions within the San Juan MLP Planning Area



This product may not meet BLM standards for accuracy and content. Different data sources and input scales may cause some misalignment of data layers. No warranty is made by the Bureau of Land Management for the use of the data for purposes not intended by the BLM.



- | | |
|--|-----------------------------|
| State Highways | Indian Reservation (IR) |
| Open Standard Terms and Conditions | National Park Service (NPS) |
| Open Controlled Surface Use | Private |
| Open Timing Limitations | State |
| Open Controlled Surface Use and Timing Limitations | State Parks and Recreation |
| Open No Surface Occupancy | US Forest Service (USFS) |
| Closed to Leasing | USFS Wilderness Area |
| PLS Stowship | |
| San Juan MLP 2015 | |
| Bureau of Land Management (BLM) | |