

**OIL AND GAS LEASING REFORM
IMPLEMENTATION PLAN**

**UTAH STATE OFFICE
SEPTEMBER 2010**

I. Introduction and Background

General

BLM Utah's Leasing Reform Implementation Plan proposes a process for ensuring orderly, effective and timely implementation of the BLM's Oil and Gas Leasing Reform, to comply with Washington Office (WO) Instruction Memorandum (IM) 2010-117. This plan process conforms with law and regulation requiring four lease sales per year if lands are available, while also providing for a clear, consistent leasing process designed to protect multiple resource values. Utah is currently in transition and will fully implement its Leasing Reform Implementation Plan starting with the oil and gas lease sale tentatively scheduled for May 2011. In the interim period, Utah will be unable to complete analyses required to offer lease parcels at quarterly auctions for November 2010 and February 2011, and is providing notification that these scheduled lease sales will be formally cancelled.

BLM Utah manages approximately 23 million surface acres and 32 million acres of Federal mineral estate within four Districts (Canyon Country, Color Country, Green River, and West Desert) and the Grand Staircase-Escalante National Monument.

Utah's Congressional, industrial, county and state government, and environmental community interests are very active in all planning and activity level projects within Utah. Public involvement throughout this process is expected and may affect projected timelines. BLM Utah contacted neighboring BLM states and anticipates additional coordination with offices in those states.

The Stiles Report

On October 7, 2009, the "Final BLM Review of 77 Oil and Gas Lease Parcels Offered in BLM-Utah's December 2008 Lease Sale" (Stiles Report) was released. This report was prepared in response to the "Report to Secretary Ken Salazar Regarding the Potential Leasing of 77 Parcels in Utah" submitted by Deputy Secretary of the Interior David J. Hayes on June 11, 2009.

The Stiles Report was completed by an eleven-person, multi-disciplinary review team that evaluated the 77 parcels (the Stiles parcels) from the December 2008 lease sale that were withdrawn by Secretary Salazar in February 2009. After its review process, the team made one of three recommendations for each of the Stiles parcels: lease (open), defer, or remove from further consideration for leasing (close). Along with leasing recommendation, the team addressed issues, concerns, and/or rationale for their recommendations, which have been considered here and will help when directing analysis in the future.

II. Land Use Plans and Stipulation Consistency

Status of Land Use Plans

Land Use Plans (LUP) are subject to a continual process of monitoring and review for effectiveness of decisions as new policies are implemented and as new information or changed circumstances arise. As a result, plan maintenance, amendments or revisions are undertaken routinely as needs are identified.

BLM Utah completed Resource Management Plans (RMPs) for six field offices in 2008 (Kanab, Moab, Monticello, Price, Richfield and Vernal). The four remaining field offices (Cedar City, Fillmore, St. George and Salt Lake) are currently utilizing older plans which include RMPs and Management Framework Plans (MFPs). Additional NEPA analyses were also prepared in conjunction with the plans, but are also dated.

Two plan revisions have been started and are in the initial stages currently. Cedar City has just begun a plan revision, which will provide an updated basis for oil and gas decisions when completed. St. George is also proposing a land use plan amendment in response to the enactment of the Washington County Land Use Bill (March 2009) that designated wilderness areas, wild and scenic rivers and two National Conservation Areas—all of which are withdrawn from mineral leasing. During this plan amendment process, St. George is reviewing all areas that could be potential ACECs, which could result in new mineral restrictions. Development of county-wide travel management plan will also be included as part of this effort.

Due to funding constraints, the remaining field offices with older LUPs, Fillmore and Salt Lake, are not currently revising their plans.

Stipulation Review

Pursuant to IM 2010-117, a list of current statewide stipulations has been forwarded to the BLM WO. Further work on stipulation consistency efforts will be undertaken after national-level feedback on consistency and edge-matching is developed.

The existing Utah Energy Support Team has and will continue to function as the Interdisciplinary Consistency Review Team (IDCR) identified in IM 2010-117. The Utah IDCR has undertaken a review of the existing stipulations in the six new RMPs in Utah and begun a process to achieve consistency throughout the eastern portion of the state. Stipulations for the western portion of Utah were also compiled.

Following issuance of the WO stipulation format guidance, a review process will be initiated for each LUP in order to define and recommend appropriate changes. After the initial drafting by the IDCR, field office review and input will ensure stipulations provide the needed protection for the resource(s). Recommendations will also be made as to whether plan amendments are necessary or if plan maintenance actions are sufficient to adopt the new stipulations. Throughout this process BLM Utah will be coordinating with the local, state and federal agencies, as appropriate, to ensure that the stipulation modifications provide the proper level and/or area of protection.

After stipulations are drafted, a review will be requested from the Office of the Regional Solicitor to ensure stipulation enforceability. Once the language is agreed upon, plan

maintenance or amendments (as needed) will be completed to formally incorporate the modified stipulations.

New Land Use Plan Stipulation Development

As stipulations are developed for new RMP revisions (Cedar City and St. George), they will also be reviewed to ensure they are edge-matched across BLM administrative boundaries. Coordination will be between district/field offices and across the Utah state line (Nevada and Arizona) to ensure consistency. Each resource specialist will be responsible for the stipulations affecting their particular resource. Issues that cannot be resolved between BLM states will be referred to WO for resolution. The Salt Lake and Fillmore FOs have seven governing LUP documents, and they are being considered for revision, but are not yet scheduled by the WO. Stipulations will be developed in the same manner as explained above, as they are revised.

III. Master Leasing Plans

Summary of Process Undertaken

Master Leasing Plans (MLPs) will be recommended utilizing the four criteria in WO IM 2010-117 to identify areas that may require MLP preparation. The four criteria are:

- 1 A substantial portion of the area to be analyzed in the MLP is not currently leased.
- 2 There is a majority Federal mineral interest.
- 3 The oil and gas industry has expressed a specific interest in leasing, and there is a moderate or high potential for oil and gas confirmed by the discovery of oil and gas in the general area.
- 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:
 - o multiple-use or natural/cultural resource conflicts;
 - o impacts to air quality;
 - o impacts on the resources or values of any unit of the National Park System, national wildlife refuge, or National Forest wilderness area, as determined after consultation or coordination with the NPS, the FWS, or the FS; or
 - o impacts to other specially designated areas.

Preliminary reviews have been conducted to review and consider which areas would meet the four criteria and which areas would likely be appropriate for preparation of a parcel-specific NEPA documents. As part of the review, interactive GIS-generated maps were developed, which included existing leases, wells (active and plugged-and-abandoned), land ownership, deferred parcels, unissued leases with pending protests, leases which are under suspension due to court decisions, and expressions of interest (EOI) - all overlaid with resource data. District managers, field office managers and

resource specialists from each office were consulted on areas that they felt merited further consideration.

External Proposals

Organizations outside of the government have taken an interest in the MLP concept and have submitted seven recommendations for MLPs. Attachment 1 includes a summary of the proposals, a table identifying issues and factors considered when evaluating the proposals, and a set of maps depicting the proposed MLP areas. Each recommendation was evaluated against the criteria listed earlier to determine if MLP preparation is warranted. The information provided in the proposals will also be taken into consideration as areas are evaluated in the future. Additional recommendations are expected to be submitted in the future.

MLP Recommendations

The “Central Moab Area” has been identified as meeting the criteria for a Master Leasing Plan. As shown on Map 1 in Attachment 2, large portions of the area are unleased. The unleased areas run throughout the Central Moab Area, and the entire area has a high percentage of federal mineral interest. Specific interest has been expressed by the oil and gas industry, and the RMP identified the area as having a high potential for oil and gas development which is confirmed by scattered producing oil wells in the proposed MLP analysis area.

Twenty of the parcels included in the Stiles Report lie within the proposed MLP area. The Stiles review team recommended that five of these parcels not be leased, and the other 15 should be deferred until further NEPA analysis could re-examine some leasing decisions. Some of the resource values the team suggested BLM Utah look at when re-evaluating leasing in these areas were: value of scenery, recreation, travel and tourism and consider a localized air quality model, night skies and broad scale visual resource analysis.

This area is also an area of high industry interest for potash exploration. Potash in this area occurs in deep beds, which are only conducive to solution mining via deep boreholes. BLM Utah proposes to include potash in the MLP analysis because the exploration and development of potash would have impacts similar to oil and gas. In fact, the Moab RMP already combines stipulations for potash and oil and gas.

Future Analysis

Analysis of potential MLP areas will be an ongoing process. As additional MLP proposals are submitted, BLM Utah will perform the same process, and as other needs are identified, internally or externally, proposals will be generated and analyzed. The Utah State Office will conduct an initial review of leases, wells, land ownership, deferred parcels, suspended leases, and EOs – and consider this information in the context of other resource values. If an area is identified as possibly needing a MLP, then it will be sent to the field office for further evaluation.

IV. Lease Parcel Review Process and Field Office Rotation Schedule

Where MLPs are considered and determined to not be necessary at this time, parcel-specific NEPA analysis will be undertaken to consider EOs and other proposals to lease (see Attachment 3). Protested leases (Sold but not Issued - SNI) and suspended leases in the vicinity of the EOs will also be addressed in the site-specific NEPA document. The issues that were of concern in the protest or that caused the suspension of the lease will be taken into consideration in the NEPA analysis. After the NEPA analysis is completed, the appropriate action for each parcel can be determined.

Utah State Office Interdisciplinary Energy Team

BLM Utah formed an Interdisciplinary Energy Support Team in 2006 to address the increased demand for oil and gas leasing and development in Utah. This team handles the leasing process from EOs/nominations through lease issuance, and provides assistance, review, oversight, and consistency for NEPA processes and consultation efforts. The team consists of the section chief, environmental coordinator, natural resource specialist, archaeologist, biologist, and land law examiner. Additional program coordination also includes planning, reservoir management, coal, water, air and paleontology.

Formation of Interdisciplinary Parcel Review Teams:

BLM Utah has been using an interdisciplinary process similar to the Interdisciplinary Parcel Review Team (IDPR) to examine lease parcels and prepare documents for the lease sales for the past several years. However, the challenge at this time is that implementation of IM 2010-117 will significantly increase the workload on the IDPR and field office interdisciplinary staff. With the present staff and budget, it is anticipated that field offices will not be able to complete their normal workload in addition to the added workload of leasing analysis required by leasing reform.

Rotational Parcel Review:

EOI cutoffs would occur for each district office once a year. The cutoffs would occur in the following order on the dates shown:

1. Color Country District Office (Jan. 4)
2. West Desert District Office (April 2)
3. Green River District Office (July 2)
4. Canyon Country District Office (Oct. 2)

EOIs would be accepted for all offices throughout the year. However review process for EOIs for the specific district offices would begin based on the dates listed above. The EOIs that have accumulated throughout the year within those district offices would be evaluated as to what level of analysis is appropriate (EA or MLP). The four criteria for MLPs will be considered, and if warranted, MLP preparation will be considered and undertaken.

BLM Utah plans to implement this IM as soon as possible and prepare to offer leases under this new guidance by May 2011. Until that time, BLM Utah will not have any lands available to lease that comply with the NEPA requirement under the new leasing reform policy. The quarterly lease sale schedule from May 2011 forward will be dependent upon the availability of lease parcels with appropriate NEPA analysis.

This plan includes a schedule for NEPA compliance for 2011 sales. Including the mandatory 30-day public comment period, the EA process will take approximately 8-10 months, depending on the office and complexity of resource issues. The NEPA compliance schedule will be evaluated after the first year of implementation to determine if a modified schedule is necessary.

Each district office would only be responsible for one lease sale per year under this sale schedule. Conducting sales based on a district rotational schedule will be a change for BLM Utah and may have a significant impact on the length of time between an EOI filing, when the parcel is scheduled to be reviewed, and its potential sale. In some cases, it could take more than a year and a half to reach auction.

This schedule includes the required notification to surface owners of split estate parcels prior to the 30-day comment period (WO IM 2010-117) and again when the parcel is included in the Notice of Competitive Oil and Gas Lease Sale (WO IM 2009-184). Both notifications will be sent by BLM Utah.

When developing this schedule consideration was given to the need to avoid overlapping periods of intense workload. While the workload for the field offices is rotational, the workload for the Energy Support Team is continuous. Once full implementation has occurred, lease sales will be in various stages simultaneously at all times.

Steps, Criteria, and Timeframes to Address the Backlog of Deferred Parcels

The Utah State Office will provide public notice to inform that all lands nominated before April 2010 will need to be re-nominated for implementation of the new lease sale rotation EOI rotation schedule. The notice will be posted on BLM Utah's public internet site, made available in the Utah State Office Business Information Center (Public Room) and will be sent to current lessees. This notice will prevent unnecessary work where there is no longer an interest in the nomination.

In the future, if leasing is determined to not be in conformance with the respective LUP, the parcel would be recommended for deletion, rather than deferral. The nomination file will be closed and the nominator will be notified of the decision.

Workload and Funding

The workload associated with Oil and Gas Leasing Reform is anticipated to have an impact on a multitude of program areas. Until the entire process has been completed for several sales, it is difficult to evaluate the extent of the impacts. With much of the traditional 1310 budget being reduced (and 1311 increased) the ability to fund leasing workloads is very limited. The findings will not even be available for the post-implementation report due May 18, 2011. A modification to Utah's Oil and Gas Leasing Reform Implementation Plan based on these could occur in late 2011.

Attachment 1

Externally-Proposed MLPs

1. Summary of Proposals
2. Issues and Factors
Considered
3. Maps of Proposals

Attachment 1 – 1

Summary of Externally-Proposed Master Leasing Plans

Utah has received 7 proposals for Master Leasing Plan areas. Two proposals are in the West Desert District – one is within the Fillmore Field Office and the other spans both Salt Lake and Fillmore Field Offices. Two proposals are in the Vernal Field Office, one is in the Price Field Office, one is in the Moab Field Office, and the last is split among the Price, Richfield and Moab Field Offices.

Western Fillmore MLP Proposal: Trout Unlimited proposed an unspecified area in the Fillmore Field Office containing sage grouse habitat or historic Bonneville cutthroat trout habitat. An EA was prepared to analyze potential effects of oil and gas leasing in the Fillmore Field Office in 2009, and the resulting decision provided that oil and gas leasing would be deferred in areas containing sage grouse or historic Bonneville cutthroat trout habitat, until a plan amendment or revision was completed.

Dinosaur Lowlands MLP Proposal (NOTE – all statistics provided by The Wilderness Society, et al): A coalition of The Wilderness Society/Colorado Environmental Coalition/Center for Native Ecosystems/Southern Utah Wilderness Alliance proposed this MLP, which spans the Utah-Colorado state line and comprises almost 1 million acres within Colorado's White River and Little Snake Field Offices and Utah's Vernal Field Office. The area is 48% leased and 25% of the leased acreage is in production. It includes the Bull Canyon, Skull Creek and Pinyon Ridge Citizen Wilderness Proposals (CWPs) in Colorado and the Bourdette Draw and Bull Canyon CWPs in Utah. The proposal also describes the following Utah areas that were inventoried by BLM for wilderness characteristics, and may or may not have been found to contain them: Moonshine Draw, Beach Draw, Stuntz Draw, Vivas Cake Fill, Split Mountain Benches, Split Mountain Benches South, and Stone Bridge Draw. Additionally, Daniel's Canyon was also inventoried by BLM (and found to have wilderness characteristics) but was not mentioned in the MLP proposal. The MLP proposal also describes five white-tailed prairie dog complexes, black-footed ferret habitat and reintroduction areas, greater sage-grouse habitat, raptor habitat and Graham's penstemon occurrences, and along with other native species, nominated and designated ACECs and adjacency to Dinosaur National Monument as part of its rationale.

Eastern Book Cliffs/Piceance Basin Proposal (NOTE – all statistics provided by The Wilderness Society, et al): A coalition of The Wilderness Society/Colorado Environmental Coalition/Center for Native Ecosystems/Southern Utah Wilderness Alliance proposed this MLP, which spans the Utah-Colorado state line and comprises almost 850,000 acres within Colorado's White River Field Office and Utah's Vernal Field

Office. The area is 56% leased; the Colorado portion is largely developed and the Utah portion is mostly undeveloped. It includes the Cripple Cowboy, Sweet Water Canyon, Hells Hole Canyon, Seep Canyon, Sunday School Canyon, and Lower Bitter Creek in Utah; Big Ridge, Canyon Pintado and Oil Spring Mountain CWPs in Colorado; and the Bitter Creek and Dragon Canyon CWPs, split between Utah and Colorado. The MLP proposal also describes greater sage-grouse habitat, Graham's penstemon occurrences, raptor habitat, along with other native species, and nominated and designated ACECs as part of its rationale.

Price River Proposal (NOTE – all statistics provided by SUWA): The Southern Utah Wilderness Alliance proposed this MLP, located in the Price Field Office in south-central Utah and comprising over one million acres. The area is 58% BLM lands, and approximately 56% of BLM land is under lease, with 27% of that acreage in production. The area includes the Price River, Lost Spring Wash, Mexican Mountain, Sids Mountain, and Desolation Canyon CWPs. The MLP proposal describes recreation resources and opportunities that should be considered in the context of energy development and also addresses the need to include climate considerations (dust melting snow and effects of global climate change).

Shadows of the Deep Creeks Proposal (Note – all statistics provided by SUWA): The Southern Utah Wilderness Alliance proposed this MLP, located in the Salt Lake and Fillmore Field Offices in western Utah and comprising approximately 900,000 acres. The area is 85% BLM land, with approximately 20% under lease. The area includes the Conger Mountain, Deep Creek Mountains, Disappointment Hills, Essex Canyon, Granite Mountain, Kern Mountains, Ledger Canyon, Ochre Mountain, Snake Valley and Wild Horse Pass CWPs. The MLP proposal describes wildlife habitat, recreation opportunities and climate change as other issues that should be considered.

Book Cliffs Divide-Grand Valley-Cisco Desert Proposal (Note – all statistics provided by SUWA): The Southern Utah Wilderness Alliance proposed this MLP, located in the Moab Field Office in eastern Utah and comprising approximately 400,000 acres. The area is 84% BLM land, with approximately 60% under lease. The area includes the Hideout Canyon, Mexico Point, and Westwater Creek CWPs, as well as the Flume Canyon, Coal Canyon and Diamond Canyon BLM reinventory areas. The MLP proposal also describes recreation opportunities and wildlife habitat.

San Rafael River Proposal (Note – all statistics provided by SUWA): The Southern Utah Wilderness Alliance proposed this MLP, located in the Moab and Price Field Offices in east-central Utah and comprising approximately 850,000 acres. The area is 83% BLM land, with approximately 30% under lease. The area includes Desolation Canyon, Dirty Devil, Duma Point, Flat Tops, Labyrinth Canyon, Lost Spring Wash, San Rafael River, Sweetwater Reef and Upper Horseshoe Canyon CWPs. The MLP

proposal describes cultural resources, endemic bee populations, recreation, wildlife habitat and climate change as other issues that should be considered.

Attachment 1 – 2

Issues and Factors Considered
Externally-Proposed Master Leasing Plans

DISTRICT Field Office	Areas Considered	Issues Taken Into Consideration to Determine Potential Level of Analysis
CANYON COUNTRY DISTRICT Moab Field Office	SUWA PROPOSAL: Book Cliffs Divide- Grand Valley- Cisco Desert MAP 1	<ul style="list-style-type: none"> • mostly leased • majority federal minerals • current industry interest in new leasing • northern portion contains many producing gas wells, southern portion has both gas and oil production • suspended and protested (SNI) leases due to wildlife issues • contains parcels that are addressed in the Stiles Report (Southern Uinta Basin group - suggesting to lease) • includes the Hideout Canyon, Mexico Point, and Diamond Canyon Citizen Wilderness Proposals (CWP). • includes Flume Canyon, Coal Canyon and Westwater Creek BLM reinventory areas • proposal also describes recreation opportunities and wildlife habitat
CANYON COUNTRY DISTRICT: Monticello Field Office	SUWA PROPOSAL: Glenn Canyon/San Juan River	<ul style="list-style-type: none"> • mostly unleased • majority federal interest • current industry interest in leasing within the eastern portion of the proposal • current discovery in the eastern portion of the proposal • includes Red Rock Plateau, Copper Point, Nokai Dome, White Canyon, Fort Knocker Canyon, Tuwa Canyon, Upper Red Canyon, The Needle, Arch Canyon, Allen Canyon, Hammond Canyon, Valley of the Gods, Lime Creek, The Tabernacle, San Juan River, Comb Ridge, Fish & Owl Creek Canyons, Road Canyon, Dark Canyon, Tin Cup Mesa, Cross Canyon, and Monument Canyon CWPs • proposal also describes climate considerations (dust melting snow, regional climate change, and global climate change), cultural resources (Hole in the Rock Trail and Alkali Ridge National Historic Landmark), big game, raptors, special status species, ACECs, and wild and scenic rivers
COLOR COUNTRTY DISTRICT: Kanab Field Office	SUWA PROPOSAL: Vermillion Cliffs/Zion	<ul style="list-style-type: none"> • unleased • majority federal interest in leasing • no industry interest • includes Upper Kanab Creek, Parunuweap Canyon, Orderville Canyon, Bunting Point, Moquith Mountain, Vermillion Cliffs, and Canaan Mountain CWPs • proposal also describes global climate change (effects of GHG contributions and soil disturbances), big game habitat, Mexican spotted owl critical habitat, sensitive species, ACECs, and wild and scenic rivers

<p>COLOR COUNRTY DISTRICT: Richfield Field Office</p>	<p>SUWA PROPOSAL: Henry Mountains</p>	<ul style="list-style-type: none"> • mostly unleased • majority federal mineral interest • very little to no industry interest in leasing • includes Factory Butte, Red Desert, Mount Ellen, Mount Pennell, Long Canyon, Bullfrog Creek, Ragged Mountain, Bull Mountain, Dirty Devil, Fiddler Butte, Muddy Creek, Little Rockies, Cane Spring Desert, Mount Hillers, and Wild Horse Mesa CWPs • proposal also describes climate considerations (dust melting snow, regional climate change, and global climate change), sensitive flora and fauna, recreation, cultural resources, ACECs, and wild and scenic rivers
<p>GREEN RIVER DISTRICT Price Field Office</p>	<p>SUWA PROPOSAL: Price River Proposal MAP 2</p>	<ul style="list-style-type: none"> • over half the area is already under lease • majority federal minerals • no current industry interest in new leasing • the northwest part of the proposal area is fully developed and contains hundreds of producing gas wells (addressed in prior NEPA analysis) • includes the Price River, Lost Spring Wash, Mexican Mountain, Sids Mountain, Never Sweat Wash and Desolation Canyon CWPs • proposal also describes recreation resources and opportunities that should be considered in the context of energy development and also addresses the need to include climate considerations (dust melting snow and effects of global climate change).
	<p>SUWA PROPOSAL: San Rafael River MAP 3</p>	<ul style="list-style-type: none"> • mostly unleased (including protested-SNI leases) • majority federal minerals • no current industry interest in new leasing • several isolated oil wells in or near the area • includes Desolation Canyon, Dirty Devil, Duma Point, Flat Tops, Labyrinth Canyon, Lost Spring Wash, San Rafael River, Sweetwater Reef and Horseshoe Canyon (South) CWPs • proposal also describes cultural resources, endemic bee populations, recreation, wildlife habitat and climate change as other issues that should be considered
	<p>SUWA PROPOSAL: San Rafael Swell Proposal MLP</p>	<ul style="list-style-type: none"> • mostly unleased • majority federal interest • no industry interest • a few older wells in the northwestern portion of the proposal • Includes Cedar Mountain, Devil's Canyon, Eagle Canyon, Jones Bench, Limestone Cliffs, Mexican Mountain, Molen Reef, Muddy Creek, Mussentuchit Badlands, Rock Canyon, San Rafael Knob, San Rafael Reef, Sids Mountain, Upper Muddy Creek, and Wild Horse Mesa CWPs • proposal describes climate considerations (dust melting snow, regional climate change, and global climate change), sensitive flora and fauna, recreation, cultural resources, ACECs, and wild and scenic rivers
<p>GREEN RIVER DISTRICT</p>	<p>SUWA et al PROPOSAL: Dinosaur</p>	<ul style="list-style-type: none"> • about half leased, half unleased • majority federal minerals • no current industry interest in new leasing

<p>Vernal Field Office</p>	<p>Lowlands (also includes Colorado's White River and Little Snake Field Offices) MAP 4</p>	<ul style="list-style-type: none"> • significant production on the southern portion of the area, both gas and oil • suspended leases due to wildlife issues • may need to revisit planning decisions regarding greater sage-grouse • includes the Bourdette Draw and Bull Canyon CWP (and Bull Canyon, Skull Creek and Pinyon Ridge Citizen Wilderness Proposals in Colorado) • includes Moonshine Draw, Beach Draw, Stuntz Draw, Vivas Cake Fill, Split Mountain Benches, Split Mountain Benches South, and Stone Bridge Draw reinventory areas (also includes Daniel's Canyon reinventory area that was found to have wilderness character by BLM, but is not mentioned in SUWA's proposal) • proposal also describes five white-tailed prairie dog complexes, black-footed ferret habitat and reintroduction areas, greater sage-grouse habitat, raptor habitat and Graham's penstemon occurrences, and along with other native species, nominated and designated ACECs and adjacency to Dinosaur National Monument as part of its rationale.
	<p>SUWA et al PROPOSAL: Eastern Book Cliffs/Piceance Basin (also includes Colorado's White River Field Office) MAP 5</p>	<ul style="list-style-type: none"> • Utah portion is mostly unleased (while Colorado portion is mostly leased) • majority federal minerals • no current industry interest in new leasing • some gas wells within the Utah area, major gas production in the Colorado portion and the larger region • contains parcels that are addressed in the Stiles Report (Central Uinta Basin - suggesting some parcels should be deferred to consider wilderness character, sage-grouse habitat and access) • includes the Cripple Cowboy, Sweet Water Canyon, Hells Hole Canyon, Seep Canyon, Sunday School Canyon, Lower Bitter Creek CWPs (all in Utah) and Bitter Creek and Dragon Canyon CWPs (split between Utah and Colorado) • proposal also describes greater sage-grouse habitat, Graham's penstemon occurrences, raptor habitat, along with other native species, and nominated and designated ACECs as part of its rationale.
<p>WEST DESERT DISTRICT Fillmore Field Office</p>	<p>TROUT UNLIMITED PROPOSAL: Western Fillmore (NO MAP)</p>	<ul style="list-style-type: none"> • mostly unleased in the western Fillmore Field Office area • majority federal minerals • no current industry interest in new leasing • no production or discovery • programmatic EA was prepared to analyze potential effects of oil and gas leasing in the Fillmore Field Office in 2009, and the resulting decision provided that oil and gas leasing would be deferred in areas containing sage grouse or historic Bonneville cutthroat trout habitat, until a plan amendment or revision was completed • Note: Public Law 106-65 (section 2815) regarding planning may delay any plan amendment effort
<p>WEST</p>	<p>SUWA</p>	<ul style="list-style-type: none"> • mostly unleased

<p>DESERT DISTRICT</p> <p>Fillmore Field Office and Salt Lake Field Office</p>	<p>PROPOSAL: Shadows of the Deep Creeks MAP 6</p>	<ul style="list-style-type: none"> • majority federal minerals • no current industry interest in new leasing • no production or discovery • a few suspended leases due to wilderness character issues • programmatic EA was prepared to analyze potential effects of oil and gas leasing in the Fillmore Field Office in 2009, and the resulting decision provided that oil and gas leasing would be deferred in areas containing sage grouse or historic Bonneville cutthroat trout habitat, until a plan amendment or revision was completed • includes the Conger Mountain, Deep Creek Mountains, Disappointment Hills, Essex Canyon, Granite Mountain, Kern Mountains, Ledger Canyon, Ochre Mountain, Snake Valley and Wild Horse Pass CWPs • proposal also describes wildlife habitat, recreation opportunities and climate change as other issues that should be considered • Note: Public Law 106-65 (section 2815) regarding planning may delay any plan amendment effort
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Attachment 2

Internally-Generated Areas Considered for Analysis

1. Issues and Factors
Considered
2. Maps of Proposals

Attachment 2 – 1

Issues and Factors Considered
Internally-Generated Areas Considered for Analysis

DISTRICT Field Office	Areas Considered	Issues Taken Into Consideration to Determine Potential Level of Analysis
CANYON COUNTRY DISTRICT Moab Field Office	Central Moab MAP 1	<ul style="list-style-type: none"> • a substantial portion of this area is currently unleased • majority federal minerals • current industry interest in new leasing (Stiles parcels) • producing oil wells within the area, natural gas discovery adjacent to area • contains parcels that are addressed in the Stiles Report (West of Arches, East of Canyonlands, and East of Arches groups - suggests revisiting leasing decisions in some areas) • suspended and protested (Sold but not issued - SNI) leases due to wilderness character and National Historic Preservation Act (NHPA) issues • potash prospecting permit areas and expansion of the existing Known Potash Leasing Area (KPLA) is also under consideration in this area
	Greater Moab MAP 2 [Note – Map 2 includes the area identified in Map 1, plus expands the north and western boundaries of the area, along with some expansion to the south.]	<ul style="list-style-type: none"> • the area is mostly leased (by expanding the Central Moab area described above to include more areas to the north and west, significant acreage was included that is already leased, thus changing the determination of this area when compared to the Central Moab area) • majority federal minerals • current industry interest in new leasing (Stiles parcels) • producing oil and gas wells in the area, natural gas discovery adjacent to area • contains parcels that are addressed in the Stiles Report (Southeast of Green River, West of Arches, East of Canyonlands, most of the East of Green River and East of Arches groups - suggests revisiting leasing decisions in some areas) • suspended and protested (Sold but not issued - SNI) leases due to wilderness character and NHPA issues • potash prospecting permit areas and potential KPLA is also under consideration in this area
	Lisbon Valley MAP 3	<ul style="list-style-type: none"> • the area is mostly leased • majority federal minerals • no current industry interest in new leasing • existing production includes oil and gas • suspended and protested (SNI) leases due primarily to NHPA issues • active potash leases • potash prospecting permit areas and expansion of the existing KPLA is also under consideration in this area • active uranium and copper mining

	Cisco desert – northwest Grand Co. MAP 4	<ul style="list-style-type: none"> • mostly leased • majority federal minerals • current industry interest in new leasing • some existing oil and gas production within the area, with more development adjacent • contains parcels that are addressed in the Stiles Report (Southern Uinta Basin group - suggesting to lease some and remove one parcel from leasing) • suspended and protested (SNI) leases due to wildlife issues
CANYON COUNTRY DISTRICT Monticello Field Office	Monticello MAP 5	<ul style="list-style-type: none"> • mostly leased • majority federal minerals • no current industry interest in new leasing • existing production, both oil and gas, within the area • suspended and protested (SNI) leases due to wilderness character, NHPA, and the Alkali Ridge National Historic District issues • Monticello was not addressed in the Stiles Report but many of the same resources would be addressed in the analysis • potash prospecting permit areas and potential KPLA is also under consideration in this area
	Butler Wash MAP 6	<ul style="list-style-type: none"> • mostly unleased • majority federal minerals • current industry interest in new leasing • no new producing areas or discoveries nearby • suspended and protested (SNI) leases due to NHPA and visual resource issues
COLOR COUNTRY DISTRICT Cedar City Field Office		New planning effort has been initiated
COLOR COUNTRY DISTRICT Kanab Field Office		No current leasing interest in new leasing
COLOR COUNTRY DISTRICT Richfield Field Office	Sweetwater-Flat Tops MAP 7	<ul style="list-style-type: none"> • mostly unleased • majority federal minerals • no current industry interest in new leasing • no production or discovery nearby • suspended leases due to wilderness character issues

<p>COLOR COUNTRY DISTRICT</p> <p>St. George Field Office</p>	<p>Little Creek Mountain MAP 8</p>	<ul style="list-style-type: none"> • all unleased • majority federal minerals • new industry interest in the area • no production or discovery in this part of the state • analysis could be conducted on everything for the east side of the field office outside of the National Conservation Areas
<p>GREEN RIVER DISTRICT</p> <p>Price Field Office</p>	<p>Sweetwater-Flat Tops MAP 9</p>	<ul style="list-style-type: none"> • mostly unleased • majority federal minerals • no current industry interest in new leasing • no production or discovery in the area or nearby • protested (Sold but not issued – SNI) due to wilderness character issues
	<p>Southeast Emery County MAP 10</p>	<ul style="list-style-type: none"> • mostly unleased • majority federal minerals • current industry interest in new leasing • no production or discovery • contains parcels that are addressed in the Stiles Report (South of Green River group - suggests revisiting leasing decisions in some areas) • suspended and protested (Sold but not issued - SNI) leases due to wilderness character and NHPA issues • potash prospecting permit areas and potential KPLA is also under consideration in this area
<p>GREEN RIVER DISTRICT</p> <p>Price Field Office and Vernal Field Office</p>	<p>West Tavaputs Plateau MAP 11</p>	<ul style="list-style-type: none"> • the area is about half leased • majority federal minerals • current industry interest in new leasing • existing gas production in the area • contains parcels that are addressed in the Stiles Report (Desolation Canyon and Nine Mile groups - suggests removing some parcels and deferring leasing until supplemental analysis considers air quality, dust and cultural resources, and revisiting leasing decisions in some areas) • suspended and protested (SNI) leases due to wilderness character and NHPA issues • discussion should tier to the West Tavaputs EIS/ROD.
<p>GREEN RIVER DISTRICT</p> <p>Vernal Field Office</p>	<p>Vernal North MAP 12</p>	<ul style="list-style-type: none"> • mostly leased • majority federal minerals • no current industry interest in new leasing • some producing oil wells in or near the area, and a few producing gas wells adjacent to the area • contains parcels that are addressed in the Stiles Report (West Dinosaur - suggesting additional coordination with the NPS) • suspended and protested (SNI) leases due to wilderness character and wildlife issues and may need to revisit planning decisions regarding greater sage-grouse
	<p>McCook Ridge MAP 13</p>	<ul style="list-style-type: none"> • mostly unleased (included Protested-SNI parcels) • majority federal minerals • no industry interest in new leasing

		<ul style="list-style-type: none"> • some scattered gas wells in the area, a lot of gas production to the northwest of the area • contains parcels that are addressed in the Stiles Report (Central Uinta Basin suggesting some parcels should be deferred to consider wilderness character, sage-grouse habitat and access) • suspended and protested (SNI) leases due to wilderness character and wildlife issues
WEST DESERT DISTRICT Fillmore Field Office	Garrison MAP 14	<ul style="list-style-type: none"> • mostly unleased • majority federal minerals • recent industry interest • no production or discovery • programmatic EA was prepared to analyze potential effects of oil and gas leasing in the Fillmore Field Office in 2009, and the resulting decision provided that oil and gas leasing would be deferred in areas containing sage grouse or historic Bonneville cutthroat trout habitat, until a plan amendment or revision was completed • Note: Public Law 106-65 (section 2815) regarding planning may delay any plan amendment effort
WEST DESERT DISTRICT Salt Lake Field Office	Five Mile Pass MAP 15	<ul style="list-style-type: none"> • mostly unleased • majority federal minerals • recent industry interest in new leasing • no production or discovery • sage-grouse analysis needed • Note: Public Law 106-65 (section 2815) regarding planning may delay any plan amendment effort.
	Rich County MAP 16	<ul style="list-style-type: none"> • mostly unleased • majority federal minerals • recent industry interest in leasing • no production or discovery • several suspended leases for NHPA issues • sage-grouse and Bonneville cutthroat trout analysis needed

NOTE – These were considered above and referenced, but not individually addressed.

STILES GROUP: West of Arches	12 lease parcels from Dec. 08; Stiles concluded the parcels should be deferred until MOU is established w/NPS and a collaborative reexamination could be utilized to further consider the value of scenery, recreation, travel and tourism and consider a localized air quality model, night skies and broad scale visual resource analysis.
STILES GROUP: Southeast of Green River	8 lease parcels from Dec. 08; Stiles concluded that 6 parcels could be leased. Two parcels were recommended for deferral/no leasing until such time that development progresses to areas much nearer to these parcels, in the interest of orderly development. At that time, potential conflicts with recreation management objectives and wilderness characteristics should be fully considered.

STILES GROUP: East of Green River (southern Book Cliffs)	4 lease parcels from Dec. 08; Stiles concluded that 3 parcels could be leased, after clarification, and one parcel should be deferred and reviewed using the soon to be released wilderness characteristics inventory manual.
STILES GROUP: East of Arches	1 lease parcel from Dec. 08; Stiles concluded that, although NSO should provide protection, there was little reason to lease the parcel from a minerals management perspective, and many social and natural resource reasons not to lease.
STILES GROUP: East of Canyonlands	7 lease parcels from Dec. 08; Stiles concluded the parcels should be deferred until MOU is established w/NPS and a collaborative reexamination could be utilized to further consider the value of scenery, recreation, travel and tourism and consider a localized air quality model, night skies and broad scale visual resource analysis.
STILES GROUP: Southern Uinta Basin	4 lease parcels from Dec. 08; Stiles concluded that 3 parcels could be leased, but one parcel should be removed from leasing because of apparent big game crucial winter range and corridor, is bounded by two WSAs and has no apparent well location due to steep slopes and floodplains, and even with use of NSO appears to have little reason for leasing given the pattern and level of development of existing leases in the vicinity.
STILES GROUP: South of Green River	4 lease parcels from Dec. 08; Stiles concluded that 2 parcels could be leased, and the other 2 should be deferred until wilderness character could be inventoried and verified, because there was no evidence of wilderness characteristic inventory although the area appeared to meet minimum size and was contiguous with a large ACEC with few roads.
STILES GROUP: Desolation Canyon	15 lease parcels from Dec. 08; Stiles concluded that 14 parcel should be deferred to reconsider impacts on documented wilderness characteristics, impacts from expanded leasing near Nine Mile Canyon, and until the West Tavaputs EIS can inform future leasing decisions on air quality issues and the NHPA consultation associated with the EIS is completed. 11 of the 14 parcels should not be considered for leasing at the present time to ensure orderly development of the area. One parcel is recommended to be removed from leasing because, in addition to the reasons listed above, portions of the parcel contain high quality sage grouse habitat.
STILES GROUP: Nine Mile Canyon	5 lease parcels (in Price and Vernal) from Dec. 08; Stiles concluded that no leasing may be preferable to leasing, but at a minimum, leasing should be deferred until supplemental environmental analysis fully considers impacts to air quality, cultural resources, big game habitat, the National Scenic Byway and visual resources, reflects ongoing NHPA consultation, and addresses methods of reducing dust associated with oil and gas traffic. This area contains parcels that are: addressed in the Stiles Report (suggests revisiting leasing decisions in some areas address resources such as Desolation Canyon and air quality), this effort could work toward the effort to better edge match the Vernal and Price RMP's, current industry interest, contain suspended and protested (SNI) leases due to wilderness character and NHPA issues. Discussion should tier to the West Tavaputs EIS/ROD.
STILES GROUP: White River	6 lease parcels from Dec. 08; Stiles concluded that 1 parcel could be leased and that the remaining five be deferred until NSO/cherry-stemmed roads could be clarified, and consideration is given to additional stipulations (VRM

	ll and mule deer and elk)
STILES GROUP: Central Uinta Basin	10 lease parcels from Dec. 08; Stiles concluded that 2 parcels could be leased and the remaining 10 should be deferred to consider sage grouse habitat, only offered with NSO because of obvious access concerns and highly erodible soil, or should be reviewed using the soon to be released new Wilderness Characteristics Inventory manual.
STILES GROUP: West Dinosaur	1 lease parcel from Dec. 08; Stiles concluded the parcel should be deferred until BLM and NPS reevaluate the merits of offering the parcel because of park proximity, and if a lease is to be offered, a lease notice identifying the need for viewshed and soundscape analysis in relation to Dinosaur NM be added – parcel could also be reconfigured to allow the immediate leasing of the western portion of the parcel, which involves split estate.

Attachment 3

(Lease Parcel Review and Lease Issuance Process for
Non-MLP Level Environmental Assessment)

Leasing Reform
Lease Parcel Review and Lease Issuance Process for
A Non-MLP Level Environmental Assessment

Process Step	Leasing Reform Policy Process Requirements and Required Timeframes	State-Specific Process Requirements and Timeframes*
Expressions of Interest (EOI) are received in the State Office (SO)	SO establishes a cutoff date for incorporating EOIs into sale packages for individual Field Offices (FO).	January 4 – Color Country District April 2 – West Desert District July 2 – Green River District October 2 – Canyon Country District
	SO reviews EOIs	2 weeks
	SO sends preliminary parcel lists to designated field offices (on a rotational basis).	Allow 3 weeks for FO review and get back to SO to ensure that the parcels can be addressed in an EA.
Leasing Reform Process		
Field Office (FO) begins parcel review process	FO Interdisciplinary Parcel Review (IDPR) Team initiates parcel review through the NEPA process.	
	<ol style="list-style-type: none"> 1. Gather Existing Information 2. Review for Resource Management Plan (RMP) conformance and adequacy 3. Review for program-specific guidance requirements 4. Identify other considerations 5. Conduct parcel site visits with appropriate IDPR team members 6. Ensure internal and external coordination 7. Ensure public participation 8. Identify/address consultation needs 	12 weeks

Process Step	Leasing Reform Policy Process Requirements and Required Timeframes	State-Specific Process Requirements and Timeframes*
	NEPA Document (EA or DNA) <ol style="list-style-type: none"> 1. Optional Scoping 2. 30-day public comment period on the Environmental Assessment (EA) and unsigned Finding of No Significant Impact (FONSI) (or unsigned Determination of NEPA Adequacy (DNA)) 	4 weeks
	As necessary, update the EA and unsigned FONSI based on public comments.	6 weeks
	FO sends the EA and unsigned FONSI (or the unsigned DNA) along with the parcel recommendations to the SO or to the District office who in turn reviews and forwards to the SO.	Included in 6 weeks above
SO reviews FO parcel recommendations and NEPA documents	Coordinate with solicitor.	2 weeks
SO begins the Lease Sale process	SO posts the Sale Notice in the SO Public room and on the SO website at least 90 days prior to the lease sale date with a link to the EA and unsigned FONSI (or the unsigned DNA).	
	30-day protest period begins.	4 weeks
	60-day protest review period begins after the protest period ends.	8 weeks
	<p>Note: When possible, state offices should attempt to resolve protests before the sale of the protested parcels and publish the decisions on the SO website.</p> <p>As appropriate, update the EA and unsigned FONSI (or the unsigned DNA) based on the protest(s) or protest resolution.</p> <p>If <u>all</u> of the protests have been resolved prior to the lease sale, the authorized officer at the SO may sign the FONSI and then the decision record (or DNA) prior to holding the lease sale.</p>	

Process Step	Leasing Reform Policy Process Requirements and Required Timeframes	State-Specific Process Requirements and Timeframes*
	A 30-day Interior Board of Land Appeals appeal period begins for the protestant upon denial of their protest.	
Lease sale	Conduct the lease sale.	
Issue the Lease(s)	<p>Prior to issuing a lease for a parcel, the authorized officer at the SO must:</p> <ol style="list-style-type: none"> 1) resolve any protest on the parcel(s) that was not resolved before the lease sale and post the decision on the SO website; and, 2) sign the FONSI (or the DNA) and then the separate decision record (decision to issue or not to issue a lease(s); and, 3) post the updated and signed documents on the SO website and in the SO public room. 4) Issue the lease(s) <p>Note: Leases shall be issued in a timely manner (60 days or less) following payment by the successful bidder of the remainder of the bonus bid (bonus bid to be remitted within 10 working days after the sale). A decision not to lease should be issued within the same timeframe.</p>	
	A 30-day Interior Board of Land Appeals appeal period begins for the protestant upon denial of their protest.	
	<p>A 30-day Interior Board of Land Appeals appeal period begins upon issuance, or a decision not to issue, the lease(s).</p> <p>Note: To bring an appeal to IBLA, the appellant must have taken part in the process, either by making a comment or filing a protest. Otherwise the appellant does not have standing to bring an administrative appeal.</p>	
Total Time to Process EA		41 weeks

*Timeframes may be able to be reduced if additional staffing and funding is provided.

Note: Plan amendments and EISs will have additional requirements and therefore take additional time.