

November 15, 2008

Don Simpson, Acting State Director
Bureau of Land Management Wyoming State Office
5353 Yellowstone Road
Cheyenne, WY 82009

Re: Protest of Dec. 2, 2008 Competitive Oil and Gas Sale

Protest of 14 parcels. Specific parcels protested include: Parcels WY-0812-177, WY 0812-178, WY-0812-179, WY-0812-180, WY-0812-181, WY-0812-182, WY-0812-183, WY-0812-186, WY-0812-187, WY-0812-188, WY-0812-189, WY-0812-190, WY-0812-191 and WY-0812-192.

Dear Director Simpson:

I hereby protest the inclusion of the above referenced parcels in the lease sale advertised by the Bureau of Land Management on October 17, 2008. I request the above parcels be withdrawn from sale because of the negative impacts that energy development would have on this important area for wildlife and the damage it would do to the high quality of recreation the area currently has. The sale of these lease sales will lead to energy development, which will result in 1) direct loss of important wildlife habitat; 2) intensive human/industrial activity displacing mule deer, pronghorn, elk, and sage-grouse from habitats crucial to their survival; and 3) infrastructure development – such as roads in relatively minimally disturbed country.

I had the privilege of having a friend, after much persistence on his part, bring me to the Little Mountain area this summer. How glad I was! I was amazed at the beauty and the diverse landscape, all found within a surprisingly contiguous chunk of public land. What a wonderful place for people to recreate! And they do! And I want to continue to! In addition, I am trained in the wildlife management field and I am honestly concerned about the impacts to our wildlife populations in this area.

Not all stretches of Wyoming's landscape have the same value to wildlife – some areas are more important for survival. The proposed lease parcels overlap crucial ranges for antelope, elk, and mule deer and includes important riparian/watershed areas for Colorado River cutthroat trout (CRCT). The U.S. Fish & Wildlife Service has been petitioned three times to designate the CRCT as threatened or endangered under the Endangered Species Act. Partly because of habitat restoration efforts in these watersheds, which would be compromised by development activity, the USFWS has thus far declined to list the species. Extensive roads, pipelines, well pads, transmission corridors would cause increased sedimentation from runoff and erosion, altering habitat and reducing cover. The disposal of wastewater, runoff & pollution from infrastructure and spills would result in water flow variability, changes in stream temperature, elevated salt and sodium levels, pollution, and altered habitat and reduced cover. What would that mean? Down the road, we could anticipate reduction in fish abundance and productivity plus reduced growth and fitness. Director Simpson, please take a moment to consider the dramatically negative consequences that energy development will have on CRCT – which could lead to problems with the USFWS.

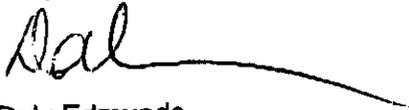
I only wish that I could be one of the 17 (6% chance) that would be so lucky to draw an elk tag in Hunt Area 31 or 1 in 11 (9% chance) to draw a deer tag in Hunt Area 102! But to even know that opportunity is out there for my neighbors to enjoy is important to me. Even more important to me is to know that it will be available for my children to enjoy. As our very own Governor has said, "People don't come to Wyoming for the opera!" Director Simpson, please take a moment to read the obituaries and see what people are saying about the importance of the outdoors. Being mandated to recognize multiple use, please consider withdrawing these lease parcels from public auction. The priceless recreational value is too high to the people of Wyoming. Energy development in this area would bring new roads, which would reduce cover security for wildlife, increase their vulnerability, and decrease trophy size big game like elk. Furthermore, the proposed well pads and construction of associated pipelines and roads, as well as the increase in noise, water and air pollution will independently and cumulatively impact a wide range of species. The increased human activity, from truck traffic to the presence of machinery and workers, will also likely result in wildlife conflicts – ranging from changing movement patterns to poaching.

Recent studies by U.S. Geological Survey in the Powder River Basin also indicate significant amounts of 'weeds' and nonnative invasive species along roads, pipelines, and drill pads have an impact on the native plant communities and associated wildlife.

And as a member of the public, we have backed up our interest in the Little Mountain area! Since 1990, over \$2 million has been spent on riparian habitat restoration projects funded by various private groups (Trout Unlimited, Bowhunters of Wyoming, Rocky Mountain Elk Foundation, boy scouts, etc.) and state and federal agencies. The sale of the above highlighted lease parcels would send a strong message – our sweat, our efforts, our values in this area do not mean anything.

The area is already heavily leased, do not lease more! Operators should focus on developing their existing leases responsibly, as is their legal right. Use good planning, include the Wyoming Game & Fish Department and members of the public in discussions, and use the best available technology to reduce impacts on this important landscape. And finally, update the Resource Management Plan. Working on one developed in 1997, which does not take into consideration our current energy landscape in southwest Wyoming, is not responsible. We need more upfront planning – so that we fully understand what the future holds for a given area. We need to move carefully because this particular piece of country is very valuable to not only me but also to many other Wyoming residents.

Respectfully,



Daly Edmunds
155 North 7th Street
Laramie, WY 82072