



The National Outdoor Leadership School

International Headquarters
284 Lincoln Street
Lander, Wyoming 82520-2848
Tel: 800-710-NOLS Fax: 307-332-8811
Website: www.nols.edu

The Leader In Wilderness Education

RECEIVED JAN 20 2009

Fax Transmittal Cover

Date: Jan 20 2009 Number of pages with cover: 5

Transmit to: Wyoming BLM

Fax number: (307) 775-6203 Telephone number: _____

Sender's name: Aaron Bannon

Sender's phone: (307) 335-2312

Sender's fax: (307) 332-8811

MESSAGE: _____

Protest of parcels

WY-0902-108, -109, -110, -111, -112

on behalf of NOLS and

Hugh, Wild & Lonesome, LLC

**National Outdoor Leadership School**

International Headquarters
284 Lincoln Street
Lander, Wyoming 82520-2848
Tel: 800-710-NOLS Fax: 307-332-8811
Website: www.nols.edu

The Leader In Wilderness Education



January 20, 2009

Bureau of Land Management
Wyoming State Office
5353 Yellowstone Road
P.O. Box 1828
Cheyenne, WY 82003-1828

RE: Protest of Lease Parcels WY-0902-108, WY-0902-109, WY-0902-110, WY-0902-111, and WY-0902-112 to be offered at the February 3, 2009 Lease Sale.

Dear Mr. Simpson:

The National Outdoor Leadership School and High Wild and Lonesome Horseback Adventures LLC, according to the guidelines laid out in the United States Department of the Interior Bureau of Land Management's Notice of Competitive Oil and Gas Lease Sale and under regulation 43 CFR 3120.1-3, hereby protest the sale of several leases being offered in the pending February 9, 2009 competitive oil and gas lease sale.

We protest lease parcels WY-0902-108, WY-0902-109, WY-0902-110, WY-0902-111, and WY-0902-112 due to their proximity to existing commercial backcountry horsepacking operations in the Jack Morrow Hills (JMH) and their potential detrimental effect on these activities.

As required by the Bureau of Land Management (BLM), this letter has been sent via fax prior to 4:00 p.m. local time on January 20, 2009, the 15th calendar day prior to the date of the sale. It has been sent, as required, to (307) 775-6203. A duplicate has been sent via traditional mail.

Interest of the Protesting Parties*National Outdoor Leadership School*

NOLS, the National Outdoor Leadership School, has been based in Lander since the school was founded in 1965. We have grown significantly in 44 years of operating to be one of Wyoming's most solid and successful non-profit organizations. For the last 20 years, we have taught horsepacking courses in the Jack Morrow Hills from our ranch in Boulder on the west side of the Wind River Mountains. Our activity consists primarily of extended progressive travel on horseback through Wilderness Study Areas and other outstanding natural areas

including Steamboat Mountain, Oregon Buttes, the Greater Sand Dunes, the Honeycomb Buttes, the Pinnacles, Bush Rim and the corridors that connect them. To our students and instructors, the Jack Morrow Hills are a unique and valuable area ideal for teaching students the skills necessary to travel and camp on self-reliant horsepacking trips. Development of the leases protested herein would have a direct and drastic effect on these horsepacking courses.

High Wild & Lonesome Horseback Adventures

High Wild & Lonesome Horseback Adventures has offered a unique riding experience to our clients since 1988. A lifetime of outfitting experience has instilled in us the value of teaching natural horsemanship philosophies and methods, which are practiced and taught throughout our trips, and the importance of sharing the knowledge, skills and experience of the wilderness with others around the country who trust us to take them out into this unique area. The instruction yields a confident, knowledgeable, and ethical horse handler by the conclusion of a horseback riding vacation. Clients ride with High Wild & Lonesome to access their public lands on horseback, in the midst of the wide-open spaces of Wyoming, with 100-mile vistas stretching between the horizons. The rides are conducted along the Continental Divide as it crosses the Red Desert and into the Honeycombs badlands wilderness of the Great Divide Basin. Clients come to experience the cool, high desert where wild horses, historic trails, and ancient Native American campsites are still a part of the landscape. High Wild & Lonesome actively and regularly runs horseback adventures within and between the Wilderness Study Areas in the Jack Morrow Hills, including the Honeycomb Buttes and surrounding lands, serving clients from all over the United States in accessing and enjoying these public lands. Development of the leases protested herein would directly impact the quality of current horseback adventure experiences.

Statement of Reasons to Support the Protest

Our primary objections to the proposed leases include the following:

- Each NOLS course in the Red Desert spends close to three weeks traveling in and between the Oregon Buttes, the Greater Sand Dunes, Steamboat Mountain, the Pinnacles, the Honeycomb Buttes, and in the corridors that connect these areas. The corridors between these Wilderness Study Areas are as critical as the areas themselves, as the combined landscape allows us to sustain course routes that extend beyond short trips in an isolated area. Should these areas and corridors be developed by oil and gas interests without appropriate stipulations, NOLS' ability to sustain high-quality programs in the Red Desert will be severely impaired. One of our camps is within WY-0902-108, and this area holds important forage and water for our horses. Fresh water is a scarce resource in the Red Desert, and eliminating this campsite would severely limit the possible travel routes of a course. Our travel routes

take students through lands currently being offered in lease parcels -109 through -112.

These areas are of similar critical importance to High Wild & Lonesome. The unspoiled scenic vistas that link the impressive Wilderness Study Areas would be irrevocably harmed by the visual, aural, olfactory, and light pollution that invariably accompany the development of oil and/or gas wells. And, displacement of wildlife and especially, wild horses, by the inevitable construction of well pads, roads, etc. and continuing disruptive operations, would severely impact the overall quality of experience for clients of High Wild & Lonesome's current horseback operations. The wilderness values and experience would be irreparably de-valued and impaired.

- Section 302 [43 U.S.C. 1732] (a) of the Federal Land Policy and Management Act clearly states that, "The Secretary shall manage the public lands under principles of multiple use and sustained yield." Section 103 [43 U.S.C. 1702] (c) indicates that multiple use is defined as including the "harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." NOLS and High Wild and Lonesome contend that the principle of multiple use has not been adhered to in the offering of these lease parcels.

No consideration has been given to existing commercial horseback operations, a legitimate resource value. No consideration has been given to harmonious and coordinated management. Instead one resource, backcountry horse travel, has been sacrificed for another, oil and/or gas production. No clause in the Special Lease Stipulation for any of the five leases we are protesting contains any provisions to allow for historic horsepacking outfits and/or schools to continue operating. In fact, the existence of such operations is not even acknowledged.

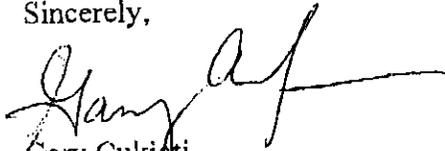
- Based on the JMH Record of Decision (ROD), a Coordinated Activity Plan (CAP) Working Group was to be formed, to be "involved in many facets of the management strategy, including data collection and analysis, development of management practices, and input on land use proposals." (JMH ROD, p. A2-18). Furthermore, the BLM is required to provide for "communication with [the] public, Working Group, [and] other agencies" prior to making a decision to sell lease parcels within the JMH. To our knowledge, no working group has been formed, or we would most certainly be in contact with it in order to communicate our interests in the Jack Morrow Hills. Communication with a working group is a prerequisite to offering leases, but communication with a non-existent working group is impossible. The BLM is violating its own CAP by ignoring the process it has set forth. The BLM should not sell the

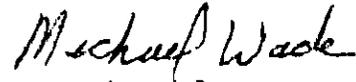
contested leases until a Working Group has been formed and included, along with the public, in communications on management decisions.

Conclusion

For the reasons stated above, NOLS and High Wild and Lonesome LLC request that the protested parcels not be offered for sale at the February 3, 2009 Competitive Oil and Gas Lease Sale.

Sincerely,


Gary Cukjati
NOLS Rocky Mountain Director




Michael & Bobbi Wade
High Wild & Lonesome LLC, Members