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The Leader In Wilderness Education

Fax Transmittal Cover

Date: 9/17/09 Number of pages with cover: 6

Transmit to: Wyo State BLM

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

Sender's name: Aaron Bannon

Sender's phone: (307) 335-2312

Sender's fax: _____

MESSAGE: Protest of lease parcels WY0910-56, -58,
-59, -60, -61, -62

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September 17, 2009

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

RE: Protest of Lease Parcels WY0910-056, WY0910-058, WY0910-059, WY0910-060, WY0910-061, and WY0910-062 to be offered at the October 2, 2009 Lease Sale.

Dear Mr. Simpson:

The National Outdoor Leadership School, the Lander Llama Company, and Blue Sky Sage Horseback Adventures, 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 October 2, 2009 competitive oil and gas lease sale.

We are protesting lease parcels WY-0910-056, WY-0910-058, WY-0910-059, WY-0910-060, WY-0910-061, and WY-0910-062 due to their proximity to existing commercial backcountry horsepacking and llama-supported operations, and due to 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 September 17, 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. It has 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, NOLS has taught horsepacking courses in the Red Desert based out of the Three Peaks Ranch on the west slope of the Wind River Mountains. The school's activity consists primarily of extended progressive travel on horseback through

Wilderness Study Areas (WSA) in and around the Jack Morrow Hills as well as other outstanding natural areas and historic trails, including the Seminole Cutoff of the Oregon and California National Historic Trails, Sweetwater Canyon WSA, Saint Mary's Peak, and the corridors that connect them. To our students and instructors, the Red Desert is a unique and valuable landscape 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 detrimental effect on these horsepacking courses.

Blue Sky Sage Horseback Adventures

Blue Sky Sage Horseback Adventures has offered a unique riding experience to its clients since 1988. A lifetime of outfitting experience has instilled 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 choose Blue Sky Sage 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 Blue Sky Sage 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. Blue Sky Sage 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. The permitted area for Blue Sky Sage ends at the Rock Springs BLM Field Office boundary, just four miles from the proposed lease sale. Development of the leases protested herein would indirectly impact the quality of current horseback adventure experiences by impacting the viewshed and nightscape of the route.

Lander Llama Company

The Lander Llama Company was founded by Scott and Therese Woodruff in 1985. The company has grown to be one of the most prominent and respected llama outfitters in the United States, gaining national recognition by several outdoor publications and land management agencies. The company places special value on the area's unique geography, flora and fauna. Guides and staff have been educated with a major emphasis on preserving the wilderness from the social and physical impacts caused by human visitation. Clients take llama-supported treks along the National Historic Trails within the Lander BLM Field Office jurisdiction, enjoying some of the best viewing opportunities of the trail and surrounding landscape available. The experience anticipated by Lander Llama Company clients would be directly impacted by oil and gas development in the proposed leasing parcels.

Statement of Reasons to Support the Protest

The National Outdoor Leadership School, the Lander Llama Company, and Blue Sky Sage represent a vital, sustainable, and growing business sector of the state. As Wyoming strives to diversify its economy to better weather the boom-bust cycle that comes with energy development, the travel and tourism sector will be an essential component of a long-term economic picture. The values associated with unique Wyoming landscapes should be preserved, and this growing economy should be nourished. This can only be done by guarding our most prized landscapes.

Our primary objections to the proposed leases include the following:

- NOLS horsepacking courses in the Red Desert travel and camp through the area occupied by proposed parcels WY0910-058 – WY0910-62 every year. As spring transitions to summer and the snowpack in this high desert recedes, NOLS courses travel from camp at Wilson Bar through the Sweetwater Canyon WSA or past St. Mary's Peak, to camp at Coyote Gulch. The courses will then move directly through the area occupied by several of these leases, access water at one of the sources along the North Fork of Sulphur Bar Creek, and camp at Circle Bar Lake just west of the block of leases. Good camps and reliable water sources are few and far between in the desert. Industrial development in this area will impact the water resource.

Additionally, the travel corridor will be directly affected. NOLS students seeking a wilderness horsepacking experience will be affected negatively by a complex of drilling rigs, wells, roads, powerlines, pipelines, and other infrastructure associated with oil and gas production. The sights, smells, light pollution, and associated industrial activity will adversely affect the students' experience. In order to avoid such development, we would be forced to decrease the size and scope of our operating area.

- Blue Sky Sage Horseback Adventures are permitted to operate in the Rock Springs BLM district. The edge of this district, marked by the boundary of the Honeycomb Buttes Wilderness Study Area (WSA), is a little over three miles from the block of leases WY0910-058 – WY0910-62. While horsepacking trips do not physically travel over the lease block, they would nevertheless be significantly affected by the sights, sounds, smells, and activity associated with industrial development, which do not observe BLM district boundaries. At high points in the Red Desert, especially within and around the Jack Morrow Hills WSA complex, the long, uninterrupted vistas spread out for miles. At night, this effect is intensified, as the dark landscape blends with the night sky. There is little open country left in the U.S. where such landscapes exist. Desert travelers cherish these sweeping views and our business depends on them.

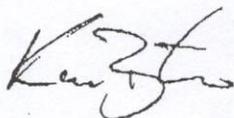
- The Lander Llama Company guides trips along the Continental Divide National Scenic Trail, the Seminoe Cutoff of the Oregon National Historic Trail and the California National Historic Trail. Lease WY0910-056 directly overlaps these trails, while the block of leases WY0910-058 - WY0910-62 is in the immediate vicinity. Clients of the Lander Llama Company will travel along these trail corridors for several days, hoping to emulate the experience of pioneers who took the same route 150 years ago. Much is the same, as the Wind River Range stretches out on the western horizon, and the wide-open landscape sweeps out in all directions. Oil and gas development just three or four miles from the trail would be a blight on the historic trail experience that visitors come to the state to enjoy.
- The Jack Morrow Hills holds several WSAs, separated by roads or by a lack of striking features. Isolating these islands of wilderness, however, does not constitute a practical management solution. The recreation economy that utilizes these areas must also move between them. It is very possible that, if the Sweetwater Canyon WSA were not separated from other nearby WSAs by an administrative boundary between the Rock Springs and Lander BLM field office jurisdiction, that it would have been included as part of the Jack Morrow Hills complex. As it lies outside this arbitrary administrative boundary, however, it does not enjoy the protections that nearby areas do. The corridors between these WSAs need to be acknowledged and managed appropriately.
- The backcountry outfitting industry and the energy extraction industry do not necessarily need to be in direct conflict. Our outfitting operations recognize the role oil and gas development plays as a major industrial driver in the state of Wyoming and we are proud of the contribution our state makes to the country's energy needs. To suggest that one economic value is more important than the other, and to indulge one resource at the expense of another, does not honor the spirit of multiple use. There are places where energy extraction carries with it too many liabilities. This is one of those places.
- The Lander BLM has been working for over two years on a Resource Management Plan (RMP), to replace the previous Lander RMP finalized in 1990. As there is an ongoing Environmental Impact Study being undertaken in the area that is currently proposed for leasing, it is appropriate for the Lander BLM to defer leasing decisions until the current process as dictated by the National Environmental Policy Act (NEPA) can be completed. Things have changed, and the NEPA analysis the BLM is relying on for this pending lease sale is outdated. The 1990 RMP did not anticipate the natural gas boom that has taken place in the Rocky Mountain west in the last 10 to 15 years. The 1990 RMP did not anticipate well densities such as those seen on the Jonah Field and Pinedale Anticline. The 1990 RMP did not acknowledge commercial operators such as ours, or the diminishing possibilities for backcountry travel. The 1990 RMP did not anticipate air quality and wildlife issues associated with aggressive

industrial development, which additional development would exacerbate. In short, the necessary NEPA analysis for these leases has not been completed.

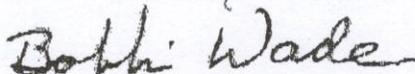
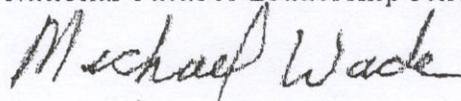
Conclusion

For the reasons stated above, NOLS, Blue Sky Sage Horseback Adventures, and the Lander Llama Company request that the protested parcels not be offered for sale at the October 2, 2009 Competitive Oil and Gas Lease Sale.

Sincerely,



Kevin Bergstrom
NOLS Rocky Mountain Assistant Director
National Outdoor Leadership School



Michael & Bobbi Wade, Members
High Wild and Lonesome LLC
Blue Sky Sage Horseback Adventures

Scott Woodruff, Owner
Lander Llama Company