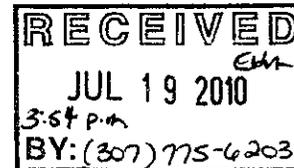


SPORTSMEN'S
Responsible Energy Development

Via Fax 307-775-6203 and Mail

Don Simpson, State Director
Bureau of Land Management (BLM)
Wyoming State Office
5353 Yellowstone Road
Cheyenne, Wyoming 82003-1828



July 19, 2010

RE: Protest of August 3, 2010 Wyoming BLM Competitive Oil & Gas Lease Sale—Specific Protest to Parcel Numbers Parcels WY-1008-029, WY-1008-030, WY-1008-031, WY-1008-032, WY-1008-033, WY-1008-034, WY-1008-035, WY-1008-036, WY-1008-037, WY-1008-038, WY-1008-039, WY-1008-040, WY-1008-044, WY-1008-045, WY-1008-047 - 049, WY-1008-054, WY-1008-065- 071, WY-1008-074 - 077, WY-1008-079, and WY-1008-080

Dear Director Simpson,

Sportsmen for Responsible Energy Development (SFRED) is a coalition of more than 500 businesses, organizations and individuals dedicated to conserving irreplaceable habitats so future generations can hunt and fish on public lands. The coalition is led by Trout Unlimited, the Theodore Roosevelt Conservation Partnership and the National Wildlife Federation and these three groups are all parties to this protest. Western public lands host an incredible diversity of fish and wildlife habitats and hunting and fishing opportunities. More than half of the nation's blue-ribbon fisheries flow across national forests, and more than 80 percent of important elk habitat is found on public lands in the West. From the last remaining native cutthroat streams to important habitat for sage grouse and big-game migration corridors that stretch for hundreds of miles, public lands in the West have provided unparalleled opportunities for generations of hunters and anglers—a way of life that continues to this day.

We believe that the above-listed lease parcels do not contain protections necessary to ensure that values important to sportsmen, including mule deer, elk, pronghorn antelope, greater sage-grouse, and Colorado River cutthroat and Bonneville cutthroat trout fisheries will be adequately protected should these leases be sold and development take place under the lease terms for which the lease is being offered.

Specifically, we protest these leases for the following reasons:

- 1) Demand for wildlife recreation is increasing and wildlife populations in areas of energy development, particularly Greater sage-grouse and mule deer, are declining;
- 2) Inadequate environmental review and setback stipulations for parcels located in sensitive coldwater fisheries require that the BLM remove these parcels from the sale pending a more up-to-date analysis. The BLM is a partner in Conservation Agreements for Colorado River cutthroat trout and Bonneville cutthroat trout, both Agreements containing specific language for protecting, enhancing and managing trout habitat for their long-term survival.
- 3) Existing BLM land use plans and proposed lease stipulations and notices are inadequate to address substantial new information and direction regarding Greater sage-grouse conservation, including the September 2007 recommendations identified by the Wyoming statewide Sage-Grouse Implementation Team and the recent decision by the United States Fish and Wildlife Service that the Greater sage grouse is warranted for protection under the Endangered Species Act, but it precluded the listing.
- 4) BLM has received substantial, new material information regarding sage-grouse populations and habitat conditions, the effects of oil and gas development on sage-grouse and mule deer, and best management practices for minimizing the effects of development on wildlife. Existing NEPA documents currently undergoing revision, include the Green River RMP and the Bighorn Basin RMP, do not take into account any of this material new information, and are an inadequate basis for new non-NSO leasing. Further, the BLM is in the midst of seeking additional RMP amendments for sage grouse management to all the BLM Field Offices and leasing parcels containing sage grouse habitat should be halted until further analysis is completed.
- 5) Analysis for new air quality emission standards must be included in any environmental analysis of these lease parcels. Air quality issues that are occurring in already developed oil and gas fields have to be evaluated prior to selling new lease parcels in heavily developed gas fields.
- 6) As revealed in the "Report to Secretary Ken Salazar Regarding the Potential Leasing of 77 Parcels in Utah," released June 11, 2009 (commonly referred to as the "Hayes Report"), and in "Final BLM Review of 77 Oil and Gas Lease Parcels Offered in BLM-Utah's December 2008 Lease Sale," released on October 7, 2009 (commonly referred to as the "Stiles Report"), the manner in which public parcels offered in the Utah lease sale were nominated and reviewed by BLM for inclusion in the sale was seriously flawed. It is our belief that the problems with this process are not limited to 77 leases in Utah, but reflect fundamental flaws with nearly every step in the leasing process used by BLM and that the wildlife and fish habitat leases in the upcoming Wyoming BLM lease sale are a product of this

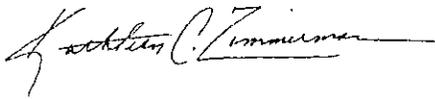
broken system. As a result, the agency's ability to manage public lands in a manner that benefits multiple use, and sustains the nation's fish, wildlife and water resources, has been seriously compromised. We believe that the contested parcels should be deferred until there is an opportunity to conduct upfront planning that fits within the protocol of the leasing reforms proposed by Secretary Salazar.

We would like to assure you that SFRED, our partners in the coalition, and the sportsmen and women we represent support energy development. However, we believe that oil and gas development can, and needs to be, developed in a manner that will protect the irreplaceable fish, wildlife and hunting and angling values that we cherish.

When dealing with fish and wildlife resources as important as those found in the greater Little Mountain Area it is imperative that BLM act on the side of caution and consult with all stakeholders before making the decision to offer a lease for auction. These leases should be deferred from the August 2010 oil and gas lease sale so that threats from oil and gas development to this unique resource can be fully evaluated and effective stipulations developed or a decision not to lease these lands can be made.

The issues inherent with these leases are indicative of the need for oil and gas leasing reforms proposed by Secretary Salazar that allow for collaboration and conflict resolution before leases are included in oil and gas lease sale notices. To that end, our organizations are prepared to assist BLM in Wyoming and elsewhere with implementing oil and gas leasing reforms to ensure that we are able to both develop our domestic energy resources and sustain our public lands fish, wildlife and hunting and angling heritage.

Thank you for the consideration of our concerns.



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