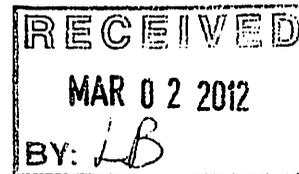




Ladder Livestock Company LLC
Box 159
Savery, WY 82332
March 2, 2012

BLM State Office
5353 Yellowstone Road
Cheyenne, WY 82009



Dear Staff,

I am writing to protest the proposed leasing of parcels WY-1205-008 and 009 for oil and gas activities.

In WY-1205-008, the sites in Section 012 and Section 013 are immediately contiguous to the headquarters of our ranching operation. While we are, in general, supportive of the production of oil and gas, and the benefits derived from them, we believe that this area is not appropriate for such activities.

The Battle Mountain area enjoys multiple uses on private, state, BLM and Forest Service lands. Oil and gas activity would negatively impact those current uses, which include wildlife habitat, recreation and grazing.

Our family is committed to practices which conserve, protect and enhance natural resources. With this in mind, we have placed Conservation Easements on 2800 acres of our mountain ranchlands, including all the private land adjoining these parcels to the east.

We have an ongoing project with the Department of Interior, U.S. Fish and Wildlife Service Partners for Fish and Wildlife program. In this project, we have enhanced about five miles of Battle Creek for the benefit of Colorado Cutthroat Trout. In cooperation with the Wyoming Game and Fish Department, we have planted Colorado Cutthroat Trout in Battle Creek, where they thrive. The proposed lease areas in Sections 12 and 13 lie about 1/2 to the west of Battle Creek itself, and run-off from those areas drains directly into Battle Creek.

In addition, the water for our household, livestock, and some irrigation originates in springs on the southeast side of Battle Mountain which are contiguous to the proposed lease areas. We are concerned with the effects drilling and its associated activities could have on our abundant and pristine water source.

I know that others have expressed concern about Greater Sage Grouse, Columbian Sharp-Tail Grouse and Bald Eagles, all of which occur in these two areas. We are participating in the USDA's Sage Grouse Initiative and have contributed considerable resources into maintaining the healthy habitat in the Battle Creek corridor that these birds enjoy. In addition, we are in the last stages of receiving Audubon Wyoming recognition as an

Important Bird Area. This BOA will be immediately contiguous to these proposed leases.

The lease documents did not recognize that T012N R033W 6PM Section 12 contains the northernmost occurrence of Gambel Oak. This is crucial to the wildlife habitat so prevalent in the region.

The Medicine Bow National Forest Battle Mountain Research Natural Area is contiguous to the parcel in Section 12 and close to the parcel in Section 13. The USDA defines such areas as:

- “ High quality examples of widespread ecosystems
- Unique ecosystems or ecological features
- Rare or sensitive species of plants and animals and their habitat
- These RNAs help protect biological diversity at the genetic, species, ecosystem and landscape scales. “

On that same piece just north of the proposed parcels, we are cooperators with a Wyoming Game & Fish Walk-In Area, along with other private landowners, the state of Wyoming and the USFS. Battle Mountain is one of the most popular big game hunting areas in the state, providing crucial winter range for deer and elk. I note that the window for drilling would be August 15th to November 15th, due to the stipulations in place for various species. This coincides with the big game hunting seasons. Oil and gas development activities are not compatible with this very popular use of the area by the public.

We are the grazing leasees on both of these parcels. We intersect with oil and gas activities on many parts of our ranching operations, which includes areas north and southeast of Wamsutter, and leases and private land near Powder Wash, Colorado. We have been concerned by the lack of reclamation, especially successful reclamation in these areas. That said, grazing and oil and gas activities can be compatible, if attention is paid to such things as weed control, erosion, limited road development and reclamation. We pay close attention to making sure our grazing practices benefit the wildlife and plant resources in our allotments. We do not want our stewardship of this landscape compromised.

As part of our ranching operation, and by working with USDA APHIS, we control the crows and ravens in the Battle Creek corridor which prey on baby lambs and calves, and the eggs of grouse and songbirds. They especially love garbage, and it has been our experience that they are particularly attracted to well sites, which sometimes have an abundance of garbage. I don't know if perches are in issue in these areas, as they have trees already on site.

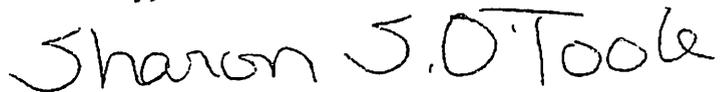
We have concern for air quality. The section 013 site lies about ¼ mile east of our house and our historic ranch headquarters. The prevailing wind is from the west, so we would be directly affected by any emissions.

We also are protesting the leases in WY-1205-009. While they are not in the Battle Creek drainage, they are in the Savery Creek and Little Snake drainage. One is on the Savery Stock Driveway, an historic trail that is used to this day by livestock.

I will not reiterate the concerns already expressed regarding WY-1205-008. With the exception of issues unique to the Battle Creek drainage, we have the same concerns regarding multiple use, wildlife habitat, conflict with recreational uses such as hunting, air quality and water quality.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Sharon S. O'Toole". The signature is written in a cursive, slightly slanted style.

Sharon S. O'Toole
Managing Member