



GREATERYELLOWSTONE.ORG  
LOCATIONS IN MONTANA, IDAHO & WYOMING

1285 Sheridan Avenue, Suite 245  
Cody Wyoming 82414  
307.527.6233

Via Fax

Chris Hite  
Chief, Branch of Fluid Minerals Adjudication  
Bureau of Land Management  
Wyoming State Office  
5353 Yellowstone Road  
Cheyenne, WY 82009

June 4, 2015

Dear Mr. Hite,

In accordance with 43 C.F.R § 3120.1-3, the Greater Yellowstone Coalition protests the sale of oil and gas lease sale parcel WY-1508-72 (formerly WY-1508-237) included in the August 2015 Competitive Oil and Gas Lease Sale Notice.

**PROTESTING PARTY**

The Greater Yellowstone Coalition envisions a healthy and intact Greater Yellowstone Ecosystem where critical lands and waters are adequately protected, wildlife is managed in a thoughtful, sustainable manner and a strong, diverse base of support is working to conserve this special place as part of a larger, connected Northern Rocky Mountain Region. Since 1983 we have been working to safeguard this rare intact ecosystem which is largely found in Wyoming, while also extending into Idaho and Montana. The Greater Yellowstone Coalition is made up of approximately 40,000 members and supporters from across the region and nation who have an interest in protecting special places like the Absaroka-Beartooth Front from industrial development.

**STATEMENT OF INTEREST**

The Sale Notice for Competitive Oil and Gas Lease Sales describes the manner in which protests will be considered. At page ix, the Sale Notice requires that "a protest must state the interest of the protesting party in the matter." We have an interest in preventing the adverse effects leasing parcel WY-1508-072 would have on the future of the Absaroka-Beartooth Front Master Leasing Plan (Bighorn Basin Draft RMP, Appendix Y). Additionally, there is significant potential to negatively affect on the wildlife and water resources along the Line Creek corridor.

Parcel WY 1508-072 is contained within the conservation community's proposed boundary for the Absaroka-Beartooth Front Master Leasing Plan. This parcel lies within

**AMERICA'S VOICE FOR A GREATER YELLOWSTONE**

a landscape important for wildlife. It is within greater sage-grouse general habitat and is within a four-mile buffer of an occupied lek. Additionally, it is significant for a variety of big game; it provides bighorn sheep, elk, moose, mule deer, and pronghorn antelope seasonal ranges. It is a split-estate parcel and is within a larger mosaic of split-estate lands in a community actively involved in—and devoted to—balancing oil and gas development and rural quality of life.

No formal public input has been sought on the boundary or management prescriptions for this MLP included in the RMP revision. We believe the BLM should defer this parcel as it is within a proposed master leasing plan area—just as BLM has for other parcels that fall within the Absaroka-Beartooth Front evaluation area (see Appendix Y in the Bighorn Basin draft RMP). Without the benefit of having full public participation to assist in analyzing the MLPs in this RMP revision, the BLM has deferred other lease parcels and we ask that it do so again.

Landowners adjacent to and near to this parcel were impacted by the Windsor Energy Group's 25-3 gas well blowout in 2006 and have endured negative effects since then to air and water quality, and human health. This is a prime location for the proactive leasing analysis done in the development of master leasing plans, which are designed for landscapes that have likely resource conflicts. Leasing WY 1508-072 ahead of the in-depth analysis done in a master leasing plan, and, importantly, ahead of any public involvement in the design of the master leasing plan is inappropriate. Parcel 1508-072 should be deferred until the public can engage and comment on the MLP, especially for a parcel with such significant wildlife values and amidst a community that is intimately involved with the impacts of oil and gas development.

**ADVERSE EFFECTS OF PROPOSED LEASING PARCEL WY-1508-072**

As stated above, there are compelling reasons why BLM should not offer parcel WY-1508-072 for oil and gas lease sale: the pending master leasing plan, potential impacts to wildlife habitat and water resources in the area and local opposition to additional energy development.

We appreciate the BLM's consideration of this protest. We ask that parcel WY-1508-072 is not offered at the August oil and gas lease sale.

Respectfully submitted,



Jennifer DeSarro  
Wyoming Conservation Associate  
Greater Yellowstone Coalition  
1285 Sheridan Avenue, suite 245  
Cody, Wyoming 82414  
(307)527-6233  
jdesarro@greateryellowstone.org