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2010 JUL 15 AM 10:00

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WYOMING S.O

July 12, 2010

Mr. Don Simpson, State Director
Bureau of Land Management
5353 Yellowstone Road
P.O. Box 1828
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JUL 15 2010

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| SD | RP&M |
| ASD | M&LA |
| OC | DSS |
| EEO | CF |
| LAW | LEAD Resp. |

Re: Development of Master Leasing Plans

Dear Mr. Simpson:

We write to provide you with our thoughts regarding the need for development of Master Leasing Plans (MLP) as required by BLM’s new Oil and Gas Leasing Reform Instruction Memorandum (IM 2010-117). Under the terms of the IM the BLM Wyoming State Office is to develop an implementation plan, including a timeline for accomplishing the tasks outlined in the IM, submitting this plan to the BLM Washington, D.C. office by not later than August 16, 2010. Under the terms of the IM, the implementation plan is to identify, among other things, “a process for identifying areas currently meeting the criteria for initiation of the MLP process” and identify MLPs that have been initiated or which may be appropriate to initiate “in the near term and any plans for initiating MLPs.”

The IM provides that an MLP is “required” if four criteria are met. These criteria are, generally: (1) that a substantial portion of the area is not currently leased; (2) there is a majority Federal mineral interest in the area; (3) that the oil and gas industry has expressed interest in leasing the area and there is a moderate to high potential for oil and gas occurrence as confirmed by the discovery of oil and gas “in the general area”; and (4) that there is a need for additional analysis or information to address resource or cumulative impacts due to oil and gas development in areas that have multiple use or natural/cultural resource conflicts, impacts to air quality, impacts to lands administered by other Federal agencies such as the National Park Service, or impacts “on other specially designated areas.”

Since the BLM Wyoming State Office is required to begin identifying areas where MLPs are required, we offer the following comments regarding areas we feel require MLPs. As you can see, it is our view that various areas in the Kemmerer, Pinedale, Rock Springs, Cody, Worland, Lander, Rawlins, Buffalo, and Casper Field Offices meet the requirements for MLP development, and thus, in our view, MLPs are “required” for these areas.

Kemmerer Field Office

Rock Creek, Tunp, Bear River Divide and Raymond Mountain Areas

In the Kemmerer Field Office an MLP should be developed for the Rock Creek/Tunp area and for the adjoining Bear River Divide area, as well as the contiguous Raymond Mountain area of critical environmental concern (ACEC) and wilderness study area (WSA). These areas form a nearly contiguous block of land in the western part of the Field Office that is largely undeveloped sagebrush steppe and mountain shrub habitat. Map 21 in the Kemmerer Resource Management Plan (RMP) record of decision (ROD) shows that all of these areas receive special management recognition and protective management under the Kemmerer RMP. In addition, as shown by Map 20 in the Kemmerer RMP ROD, a number of historic trails also traverse this area, and they too receive protective management under the RMP. Moreover, Map 16 in the Kemmerer RMP ROD shows that the Dempsey Ridge and Pine Creek Special Recreation Management Areas are found in this area, or perhaps just to the east of it, and Map 19 shows that the majority of this area is Visual Resource Management (VRM) Class II, which demands heightened protection of the visual resource.

We believe there is little doubt this area meets the criteria specified in the IM for development of an MLP. As shown in Map 19 that accompanies the Kemmerer RMP final environmental impact statement (FEIS), most of this area is unleased or has only intermittent leased blocks. And as shown in Maps 2 and 3 in the Kemmerer RMP FEIS, this area is overwhelmingly characterized by a Federal interest in the mineral estate. There also can be no doubt the fourth criteria specified in the IM is met.

There are significant multiple use or potential natural/cultural resource conflicts in this area, and there are issues related to specially designated areas. As shown in Map 7 of the Kemmerer RMP ROD, there are large areas of crucial big game winter ranges in the proposed MLP. The Kemmerer RMP ROD specifies that there will be no more than a 12.5 percent net loss of crucial habitat acres. Kemmerer RMP ROD at 2-30 to -31. As shown in Map 8 of the Kemmerer RMP ROD, much of this area is to be managed for contiguous blocks of shrub habitat, and on page 2-34 of the Kemmerer RMP ROD (Decision 4015), provision is made to "Maintain connections between these community types by managing projects to minimize construction disturbance to the smallest acreage possible" Map 9 in the Kemmerer RMP ROD shows that special status plant populations occupy parts of this area, and a number of special provisions are made for their protection. Map 10 in the Kemmerer RMP ROD shows there are a large number of sage-grouse leks in this area, as well as raptor nests. And as mentioned above, many high quality segments of the national historic trails traverse this area and the Dempsey Ridge and Pine Creek Special Recreation Management Areas are found here. Again, this area is predominantly a VRM Class II area, which means that any development could inherently create conflict with this management direction and other management challenges. And since the Kemmerer Field Office is adjacent to the Pinedale area where there have been problems with ozone pollution, this area is one where "impacts to air quality" are of concern; portions of

Lincoln County are in the State of Wyoming's recommended ozone nonattainment area.¹ Accordingly, this area meets criterion four that is specified for MLP development in the IM. There are a number of important resources issues in this area and conflict could attend any proposed oil and gas leasing and development in this area.

That leaves the question of whether the oil and gas industry has expressed interest in leasing this area and whether there is a moderate or high potential for oil and gas occurrence. In the past several years the BLM has offered for sale a number of lease parcels in the vicinity of Fossil Butte National Monument, and many of these parcels have been in the area proposed for this MLP. We draw your attention to the February 5, 2008 lease sale which included many lease parcels in this area. And in BLM's upcoming August 3, 2010 lease sale, parcel WY-1008-077 is in this area, so apparently industry is showing interest by nominating parcels in this area. We note that there have been lease protests filed by the Wyoming Outdoor Council and others regarding lease parcel offerings in the Fossil Butte National Monument area, so conflict could attend leasing in this area.

While some of this proposed MLP area may be administratively unavailable for oil and gas leasing under the terms of the new Kemmerer RMP, Kemmerer RMP ROD Map 3, much of the area remains available for leasing. According to Map 3-4 in the Final Reasonable Foreseeable Development Scenario for Oil and Gas for the Kemmerer RMP revision (RFD), this area has moderate oil and gas occurrence. RFD at 3-5. We also note that the BLM Kemmerer Field Office approved the Bear Canyon Exploratory Well Development Project in this area in 2008. See <http://www.blm.gov/wy/st/en/info/NEPA/kfodocs.html>. While data on the Wyoming Oil and Gas Conservation Commission website does not indicate there are oil and gas fields in this area, there are many just to the east of it—they are “in the general area.” There seems to be little doubt but that industry has expressed some interest in this area and that there is at least moderate potential for oil and gas occurrence, with actual drilling having been planned and approved in at least one case.

The Rock Creek/Tunp, Bear River Divide, Raymond Mountain area is substantially unleased, has a majority Federal mineral interest, has had industry expressions of interest in leasing and a moderate to high oil and gas potential, and has potential resource conflicts that require additional analysis or information. Thus, in our view, an MLP is required for this magnificent wildland area and the BLM Wyoming State Office should take steps toward developing one, and state that this will be the case in the leasing reform implementation plan it is preparing.

Area North of U.S. Highway 189

In addition to the Rock Creek/Tunp/Bear River Divide/Raymond Mountain areas (hereinafter Tunp area), we believe the BLM should strongly consider developing an MLP for

¹ And given EPA's likely adoption of a unique secondary standard for ozone so as to protect human welfare, in addition the primary standard set to protect the public health, by not later than August 31, 2010 pursuant to court order, these air quality issues must be viewed as implicating more than just the ozone primary standard. In addition, visibility issues and protection of Class I areas are an issue in western Wyoming.

the area north of U.S. Highway 189 on the stretch of that road that traverses the Field Office North of Kemmerer. This area is contiguous with the Tunp area, so a single MLP could be developed for this vast expanse of undeveloped sagebrush and mountain shrub habitat.

The reason we did not propose this area as part of the Tunp MLP area is that this part of the Field Office has a considerable amount of existing leasing. *See* Map 19 Kemmerer RMP FEIS. But there are nevertheless a number of unleased blocks in this area and if viewed in totality with the Tunp area, we feel that a credible argument can be made that a "substantial" portion of this area is unleased. Perhaps more importantly, from a practical and ecological perspective it would make a great deal of sense to develop one larger MLP that encompasses and guides management for this entire area which clearly has a great deal of ecological continuity and common resource issues and values. Essentially such an MLP could guide leasing in the large contiguous blocks of BLM that lie north of the railroad checkerboard, which we believe makes sense not only from an ecological perspective but also from a legal standpoint.

Other than the level of leasing, there is little doubt that this expanded area would meet the other three criteria. This area is essentially all Federally owned minerals. *See* Maps 2 and 3 Kemmerer RMP FEIS. This expanded area has resource values and concerns that are equal to those in the Tunp area. For example, the Kemmerer RMP ROD designates a significant part of this area as the Oregon Trail Special Recreation Management Area. *See also* Map 20 (presenting National Historic Trails). This area is VRM Class II or Class III, which again requires heightened management focus. *See* Kemmerer RMP ROD Map 19. And even if the Dempsey Ridge and Pine Creek Special Recreation Management Areas are not in the Tunp area, they are definitely located in this expanded area. The issues related to air quality are at least as great here as in the Tunp area further west, and probably even greater due to the immediate proximity to the Pinedale Field Office. The wildlife issues discussed above are at least as significant in this area as in the Tunp area.

As to industry interest, the level of leasing in this area shows that there is industry interest in the area; industry is apparently nominating lease parcels in the area. This entire area is administratively available for oil and gas leasing under the terms of the Kemmerer RMP ROD. Kemmerer RMP ROD at Map 3. According to Map 3-4 in the Final Reasonable Foreseeable Development Scenario for Oil and Gas for the Kemmerer RMP revision (RFD), this area has moderate oil and gas occurrence. RFD at 3-5. Data on the Wyoming Oil and Gas Conservation Commission website indicate there are a number of oil and gas fields in this area. The large Moxa Arch field is just to the south of this area. There seems to be little doubt but that industry has expressed some interest in this area and that there is at least moderate potential for oil and gas occurrence.

Given these considerations, we urge the BLM to strongly consider making the Area North of U.S. Highway 189 a component of the MLP for the Kemmerer Field Office, which would also include the Tunp area.

Pinedale Field Office

The Miller Mountain Area

In the Pinedale Field Office the BLM should pursue an MLP that seeks to provide further leasing guidance for the Miller Mountain area.

The Miller Mountain area as we define it here would include the Miller Mountain Management Area defined in the Pinedale RMP ROD, but also the adjacent Rock Creek and Beaver Creek ACECs and Lake Mountain WSA. As shown in Map 1-3 in the Pinedale RMP ROD, considerable portions of the Miller Mountain area are not currently leased. *See also* Map 2-9. Thus, this area meets the first criterion for developing an MLP specified in the IM. The Federal government owns the vast majority of the mineral estate in the Pinedale Field Office area, including in the Miller Mountain area. Pinedale RMP ROD Map 1-3. Consequently the second criterion is met.

Miller Mountain has significant environmental values that indicate there could be resource impacts or conflicts that require additional analysis or information. A portion of the Lander Trail runs near to the Miller Mountain area as we are defining it here (this segment is just north of the Beaver Creek ACEC). Pinedale RMP ROD Map 3-1. Big game crucial winter ranges are prevalent. Pinedale RMP ROD Map 3-20. Considerable portions of the Federal lands in the Miller Mountain area are designated VRM Class I or II. Pinedale RMP ROD Map 2-30. There are significant elk parturition areas in this area. Pinedale RMP FEIS Map 3-21. Mule deer, elk, and pronghorn migration corridors are found in the area. Pinedale RMP FEIS Map 3-16. There are Colorado cutthroat trout populations or historical occurrences in this area. Pinedale RMP FEIS Map 3-23. *See also* Pinedale RMP ROD at 2-54 to -56 (Rock Creek and Beaver Creek ACECs created partially due to important native fish concerns in these areas). Air quality of course is a very significant issue throughout the Pinedale area given the high ozone levels that have occurred and the likely designation of this area in nonattainment with the National Ambient Air Quality Standard for ozone.² And of course the presence of the Beaver Creek and Rock Creek ACECs, and the Lake Mountain WSA in the Miller Mountain area means that there could be “impacts on other specially designated areas” if leasing were to occur, and the Miller Mountain Management Area is a “specially designated” area as well. *See* Pinedale RMP ROD at 2-56 to -57 (designating the Miller Mountain Management Area and providing management prescriptions for it). The management objective for the Miller Mountain Management Area is to “Maintain open space, natural landscapes, and crucial big game winter ranges.” Pinedale RMP ROD at 2-56. Given all of these attributes, we feel there is no doubt that the fourth criterion that the IM requires for MLP development is present in the Miller Mountain area in the Pinedale Field Office.

² And again, given EPA’s likely adoption of a unique secondary standard for ozone so as to the public welfare, in addition to the primary standard established to protect the public health, by not later than August 31, 2010 pursuant to court order, these air quality issues must be viewed as implicating more than just the ozone primary standard. In addition, visibility issues and protection of Class I areas are an issue in western Wyoming.

So again the remaining question that must be answered is whether the oil and gas industry has expressed interest in leasing in this area and there is a moderate to high potential for oil and gas occurrence as confirmed by discoveries “in the general area.” In the Miller Mountain area, five lease parcels located in this area were offered for sale in the just-completed May 2010 lease sale, and all of these parcels were sold to successful bidders. We would also note that this area is near to, and some of it is located in, the Big Piney/LaBarge and Riley Ridge oil and gas fields. Pinedale RMP FEIS Map 3-5. And according to data on the Wyoming Oil and Gas Conservation Commission website, the following oil and gas fields are located in the range of Townships 24-29 North and Ranges 112-115 West: Abo Ditch, Big Piney, Big Piney P Sand Unit, Big Piney Shallow Unit, Bird Canyon, Dry Piney, Fogarty Creek, Fontenelle, LaBarge, Long Island, McDonald Draw, Names Hill, Saddle Ridge, and Tip Top. At a minimum these oil and gas fields are “in the general area” of this proposed MLP.

The Oil and Gas Reasonable Foreseeable Development (RFD) Scenario report and the Mineral Occurrence and Development Potential Report available on the Pinedale Field Office website confirm the potential for oil and gas development in the Miller Mountain area. *See* <http://www.blm.gov/wy/st/en/programs/Planning/rmps/pinedale.html> (*See, e.g.*, Figure 11 in the Oil & Gas Reasonable Foreseeable Development (RFD) Scenario showing that there is a “high” potential for oil and gas occurrence in the Miller Mountain area).

Overall it seems clear that the Miller Mountain area meets all four criteria specified in the IM for when an MLP is “required.” Thus, an MLP should be prepared for the Pinedale Field Office that addresses this area, and the leasing reform implementation plan the BLM Wyoming State Office is preparing for its national office should provide for this. This area represents highly significant sagebrush steppe habitat and important wildlife habitats that should have further planning applied to them before oil and gas leasing occurs. The potential for conflict is significant without further planning. Most of the Miller Mountain area is designated a “traditional leasing area” under the Pinedale RMP, and thus development of an MLP is appropriate. *See* Pinedale RMP ROD at Maps 2-4 and 2-9 (presenting the oil and gas leasing categories and oil and gas management area designation for this area). The Pinedale RMP essentially seeks to direct oil and gas development toward “intensively developed fields” (Jonah, Pinedale Anticline, Big Piney/LaBarge) while protecting other areas of the Field Office, so development of an MLP for this area would compliment and facilitate implementation of the management direction set in the Pinedale RMP.

Rock Springs Field Office

In the Rock Springs Field Office three areas should be made subject to an MLP. These are the Little Mountain, Jack Morrow Hills, and Adobe Town areas. These three areas are some of the most iconic landscapes in all of Wyoming.

Little Mountain

The Little Mountain area is shown on the enclosed map. It essentially includes BLM lands south of the checkerboard between Wyoming Route 430 and Flaming Gorge Reservoir, down to the Colorado Border, although some checkerboard lands administered by the BLM (private lands are not included in the area) are also included. As BLM of course knows, this area has become of great concern to the public, especially the hunting and fishing public.

We feel there is no doubt the Little Mountain area meets the four criteria which make development of an MLP "required." Based on data that appears on BLM's GeoCommunicator website, it appears that no more than about 50 percent of this area is leased, and there is a large block of unleased land in the south-central part of the area, near the Colorado border. This unleased area appears to represent at least 30 percent of this important area, and perhaps more. According to Map B that was part of the Green River Resource Area RMP FEIS, essentially all of the mineral interests in this area are Federally owned. And there can be no doubt this area has resource or cumulative impacts that require additional analysis due to the significant values and potential conflicts in this area, as well as a number of specially designated areas.

The greater Little Mountain region is a vast, relatively pristine area that supports a diversity of habitat types along an elevation gradient that begins at the shores of Flaming Gorge Reservoir and climbs to the summits of Little, Pine, Richards and Miller mountains. According to Governor Freudenthal, many consider the Little Mountain area to be the crown jewel for wildlife and recreation in Wyoming. Indeed, Sportsmen for Responsible Energy Development, <http://www.sportsmen4responsibleenergy.org/>, has ranked the area in its list of the ten most important fish and wildlife habitats on American public lands that are at risk from energy development. The greater Little Mountain area is famed among sportsmen for its world-class trophy elk and mule deer hunting opportunities. It is considered by many to be one of the best hunting destinations in Wyoming and one of its mule deer hunt areas is recognized nationally as one of the West's top mule deer hunting spots. The area's sizable pronghorn herds also attract wildlife viewers and sportsmen. The area contains crucial seasonal ranges for all three ungulate species as well as habitat for moose. *See* ROD and Green River RMP at Map 15. There are many sage-grouse seasonal restriction areas in this area. *Id.* at Map 16. Numerous raptor nests are found in the area. *Id.* at Map 17. The greater Little Mountain area's highly-sensitive watersheds contain genetically pure Colorado River cutthroat trout.

The Wyoming Game and Fish Department has designated much of the greater Little Mountain area as a key nongame area because of the important habitat the area provides for a number of Wyoming's Species of Greatest Conservation Need (SGCN). Eight avian and sixteen mammalian SGCN occur in the greater Little Mountain area, including Colorado River cutthroat trout, greater sage-grouse, ferruginous hawk, pygmy rabbit, Wyoming pocket gopher, and midget faded rattlesnake. The greater Little Mountain area includes a significant portion of the rare midget faded rattlesnake's Wyoming range.

The greater Little Mountain Area contains one WSA – Red Creek Badland – and one BLM ACEC – Greater Red Creek. In addition there is one proposed ACEC, Current Creek-Sage Creek, and two BLM special management areas, Pine Mountain and Sugarloaf Basin. Map A

Green River Resource Area RMP FEIS; *see also* ROD and Green River RMP at 25-43 (making special management provisions for these areas). The Little Mountain Recreational Use Area is located in this proposed MLP area. ROD and Green River RMP at Map 21. Much of this area is a VRM Class III area. *Id.* at Map 24. So there is little doubt criterion four listed in the IM is met in the Little Mountain area.

There is also no doubt that this area has had expressions of interest in leasing and that there is the potential for oil and gas development in this area. At the December 2, 2008 oil and gas lease sale BLM was prepared to offer approximately 14 lease parcels in the Little Mountain area. While many if not all of these lease parcels might have been withdrawn due to concerns expressed by Wyoming's Governor, industry clearly has an interest in this area. Moreover, at the June 2, 2009 lease sale the BLM offered a lease parcel in the Little Mountain area (parcel WY-0906-076). A number of parcels in BLM's upcoming August 3, 2010 lease sale are located in this area or at least nearby (parcels WY-1008-065, -066, -067, -068, -069, -070, and -071). Lease parcels offered for sale in the Little Mountain area have been subject to protests from the public, especially from hunting and fishing groups.

And based on data available at the Wyoming Oil and Gas Conservation Commission website regarding the locations of oil and gas fields, the following fields are located at least in the general area of the Little Mountain area: Baxter Basin, Brady, Buster Basin, Camel Rock, Canyon Creek, Chimney Rock, James Creek, Joyce Creek, Little Worm Creek, Massacre Hill, Middle Mountain, Potter Mountain, Pretty Water Creek, Salt Wells, and Vermillion Creek. The BLM Rock Springs Field Office has prepared an environmental assessment (EA) for the Devon Energy/Baxter Natural Gas Exploratory Proposal, which is located in this area. *See* http://www.blm.gov/wy/st/en/info/NEPA/rsfodocs/Devon_Energy.html. The BLM has prepared an EA for the North Dutch John 2D Seismic Project which is located in this area. *See* <http://www.blm.gov/wy/st/en/info/NEPA/rsfodocs/nodutchjohn2d.html>. In addition, the BLM is preparing an EIS for the Hiawatha project which is located just to the east of the Little Mountain area (some of the Hiawatha project areas is west of Route 430 and thus would be in the Little Mountain area), which could involve drilling as many as 4208 wells.

It seems clear Little Mountain meets all of the MLP criteria, and thus an MLP is required to be prepared for this spectacular and unique area, and provision for this should appear in the oil and gas leasing reform implementation plan the BLM Wyoming State Office is preparing. While limited portions of this area are "no lease" areas under the Green River RMP, or are no surface occupancy areas, much of this area is available for oil and gas development. *See* ROD and Green River RMP at Maps 13 and 14 (presenting no lease and no surface occupancy areas). Accordingly preparation of an MLP is advised.

Jack Morrow Hills

The Jack Morrow Hills is one of the most iconic areas in Wyoming, and the BLM has recognized its special values by preparing the Jack Morrow Hills Coordinated Activity Plan/Green River Resource Management Plan Amendment (JMH CAP), which was approved in 2006.

Based on the leasing information available at BLM's GeoCommunicator website, it appears that no more than about 50 percent of the Jack Morrow Hills area is currently leased. This is confirmed by Map 10 in the JMH CAP FEIS, which again shows that only roughly 50 percent of the area is leased. And from discussions we have had with personnel in the BLM's Rock Springs Field Office, we understand that many leases in this area are expiring because they are at the end of their terms and at the end of July, 2009 the BLM lifted the lease suspension that had been in place in this area, meaning leases are expiring if development is not pursued, which is apparently happening on a fairly widespread basis in this area.

Map B in the Green River Resource Area RMP FEIS makes it clear that virtually all minerals in this area are Federally owned. Map 3 in the JMH CAP ROD also makes this clear.

There is no doubt that this area demands additional analysis and information to address resource and cumulative impacts arising from multiple use and natural/cultural resource conflicts, and the presence of specially designated areas. The Jack Morrow Hills is a 620,000-acre area in the northern Red Desert that includes seven WSAs, five ACECs, and some of the most intact sections of the historic Oregon, California, Mormon, and Pony Express pioneer trails. Obviously there are issues related to "specially designated areas" here. In addition, the BLM has designated part of this area as part of the Red Desert Watershed Management Area, and one of the guiding management prescriptions for this area is "to provide large areas of unobstructed views for enjoyment of scenic qualities." Green River RMP ROD at 39. The JMH CAP makes many other special management prescriptions for this area.

In addition, this area has extremely important wildlife values and there are very important heritage values. *See* JMH CAP ROD at Map 5 (Heritage Resources—including White Mountain Petroglyphs, Boars Tusk, Tri-Territory Marker, Indian Gap, and Crookston Ranch), Map 6 (Sensitive Plant Resources), Map 8 (Sensitive Avian Resources), Map 9 (Greater Sage-Grouse Habitat), Map 10 (Sensitive Big Game Areas—including parturition areas, migration corridors and crucial winter range), Map 14 (Recreation Sites and Points of Interest—including White Mountain Petroglyphs, Boars Tusk, Tri-Territory Marker, and Indian Gap), and Map 16 (Visual Resource Management Classifications—much of the area is designated VRM Class I or II). So there is no doubt that IM criterion number three for preparation of an MLP is met here. If oil and gas development were to be proposed in this area there is no doubt it would be highly controversial and many resource and management issues would be implicated.

Industry has expressed interest in leasing in this area and there is a moderate to high potential for oil and gas occurrence. In the April 2008 lease sale BLM sought to sell two lease parcels in the Jack Morrow Hills. These parcels were later withdrawn—apparently because the successful bidder never paid the fees that were due—but the BLM turned around and offered these same two parcels again at the December, 2008 lease sale, where they were sold.³ And then in the February, 2009 lease sale the BLM sought to offer five more parcels in the Jack Morrow Hills. While BLM later withdrew these parcels from the sale due to objections from Governor Freudenthal, it is nevertheless apparent that industry has an interest in leasing in this area.

³ A protest of the sale of these two parcels filed by the Wyoming Outdoor Council and others remains pending.

And there is no doubt there is a moderate to high potential for oil and gas to occur in this area. First and foremost the rather large existing Nitchie Gulch field in the southwest portion of the JMH CAP area stands as a testament to this fact. *See also* Table 3-24 in the JMH CAP ROD (pages 3-84 to -87) (presenting approximately 160 wells that have been drilled in the Jack Morrow Hills area); *id.* at Map 69 (showing much of the Jack Morrow Hills has moderate to high oil and gas development potential). While the JMH CAP designates a considerable portion of this area as unavailable to future leasing (“Area 3”), much if it remains available for leasing (Areas 1 and 2).

To summarize, the Jack Morrow Hills is substantially unleased, the mineral interests are almost entirely Federally owned, the oil and gas industry has expressed an interest in leasing the area and there is a moderate to high potential for oil and gas occurrence, and there are significant resource issues and values that require additional analysis before oil and gas leasing should occur. Thus, an MLP is required for this iconic area and the BLM Wyoming State Office should so provide in the leasing reform implementation plan it submits to the Washington, D.C. office.

Moreover, we note the following which we believe indicates further that development of an MLP for the Jack Morrow Hills area is advised. Under the JMH CAP a “working group” is to be formed to help manage this area. JMH CAP ROD at A2-17. In addition the JMH CAP makes provisions for implementation, monitoring, and evaluation. JMH CAP ROD at Appendix 2. This appendix makes many significant provisions for how the JMH CAP should be implemented. And finally, the JMH CAP provides that an interdisciplinary monitoring plan will be used to implement the JMH CAP. JMH CAP ROD at 6. As best we can determine these implementation provisions have not been fully developed or put in place to date; Governor Freudenthal shares this perspective. Consequently development of an MLP could be a useful way to ensure these various implementation provisions are adhered to and in fact carried out in this BLM-recognized special management area.

Adobe Town

The Adobe Town area is also an iconic Wyoming landscape. It is recognized by the State of Wyoming as a Rare or Uncommon Area. As recognized by the Wyoming Environmental Quality Council (EQC), this area “is very unique and spectacular and should be protected as very rare or uncommon.” This area extends into the Rawlins Field Office as well as the Rock Springs Field Office, and for purposes of this discussion we will treat Adobe Town as including the full Rare or Uncommon area recognized by the State of Wyoming, which is 181,000 acres in extent. *See* EQC Findings of Fact, Conclusions of Law and Order; In the Matter of the Petition of Biodiversity Conservation Alliance for Designation of “Adobe Town” as Very Rare or Uncommon; EQC Docket No. 07-1101 for a full description and maps of this area.

This area perhaps cannot be said to be substantially unleased, except for the Adobe Town WSA which is almost or entirely unleased. But even though this area may not fit this criterion as well as most other areas discussed in this letter, we believe that BLM should nevertheless treat it as having a “substantial” portion that is unleased due to the large unleased area in the WSA. The WSA is approximately 86,000 acres, which represents 47.5 percent of the area. Given the iconic and State-recognized values of this landscape, we do not believe the BLM should be unduly technical or strict in interpreting the word “substantial” as it applies to this particular area.

Moreover, as shown on BLM's GeoCommunicator website, there are areas to the west and southwest of the WSA that are not leased, and there are also substantial unleased areas in the checkerboard to the north and northwest of the WSA. Thus, we believe this area can be treated as being substantially unleased for purposes of determining whether an MLP is required for the area.

As with Little Mountain and the Jack Morrow Hills, the Rock Springs portion of this area is almost entirely Federally owned minerals. Map B Green River Resource Area RMP FEIS. The same is true in the Rawlins Field Office, as shown by Map 1-3 in the ROD and Approved Rawlins RMP.

We will not belabor the natural and cultural values of this area which are indisputable. We direct BLM again to the EQC's Findings of Fact, Conclusions of Law, and Order for a review of these values. There are phenomenal biological, cultural, and geological values in this area. This area also contains "specially designated areas", as shown by the presence of the Adobe Town WSA. This is further evidenced by the designation of the Monument Valley Management Area in the Green River RMP with the special management that applies to it. See ROD and Green River RMP at 37. Furthermore, the designation of the Adobe Town Dispersed Recreation Use Area in the Rawlins RMP shows that this area is characterized by "specially designated areas." See ROD and Approved Rawlins RMP at Map 2-58 and pages A37-1 to -3. We believe it is clear this area requires additional analysis or information to address resource impacts or conflicts were oil and gas leasing or development to occur. And there is no doubt that oil and gas leasing and development in this area is highly controversial and of concern to the public, as evidenced by the numerous lease parcel protests BLM has received in this area as well as requests for State Director review of particular oil and gas development projects.

We want to point out that we recognize that a State of Wyoming Rare or Uncommon designation does not directly affect issues related to oil and gas development. We are not arguing that this State designation makes the area unavailable for oil and gas leasing—it does not. But while that is true this is also true: it is indisputable the State of Wyoming has recognized this entire area (not just the WSA) possesses *very* rare or uncommon values. These values exist whether oil and gas development is precluded or not. The State's recognition and designation of these special values are a legal fact relative to the attributes of this area, regardless of oil and gas leasing and development considerations. Consequently we feel the BLM should recognize the State's valuation of this area, and if that is done development of an MLP seems appropriate.

Per usual, the last issue that must be addressed is the question of industry interest in leasing the area and whether oil and gas might be found in the area. We will not present BLM will detailed information documenting that leasing is occurring in this area, as it is indisputable. BLM has offered probably several dozen lease parcels in this area at virtually every lease sale for at least the last two years, and probably longer. As for development occurring, that is also readily apparent. The Wyoming Oil and Gas Conservation Commission website shows that there are well over a dozen oil and gas fields in the townships making up and surrounding the Adobe Town area, so clearly there is oil and gas in the area. The BLM Rock Springs Field Office has prepared an EA for the Desolation Road Exploratory Gas Well drilling proposal in this area. See <http://www.blm.gov/wy/st/en/info/NEPA/rsfodocs/DesolationRoadGas.html>. According to Map 12 in the Rawlins Oil and Gas Reasonable Foreseeable Development (RFD) Scenario, the

Adobe Town area has a high potential for oil and gas occurrence. See http://www.blm.gov/wy/st/en/programs/Planning/rmps/rawlins/og_rfd.html. See also <http://www.blm.gov/wy/st/en/programs/Planning/rmps/rawlins/minerals.html> (Rawlins Mineral Occurrence and Development Potential Report). And there are large existing oil and gas fields in the general area, such as the Desolation Flats field and BLM is currently developing an EIS for the mammoth Continental Divide-Creston project just north of Adobe Town. There are at least 20-30 existing oil and gas wells on the east side of this area in the Barricade Unit.

It seems clear that the Adobe Town area meets the four criteria specified in the oil and gas leasing reform IM, and thus an MLP is required for this area so as to ensure its “very rare or uncommon” values are fully protected in the face of what would be intense controversy were leasing or development to proceed. The implementation plan being prepared by the BLM Wyoming State Office should provide for development of an MLP in this area.

The Bighorn Basin (Cody and Worland Field Offices) and the Lander Field Office

The Wyoming Outdoor Council, Greater Yellowstone Coalition, and Powder River Basin Resource Council previously provided the BLM with a letter on June 26, 2010 where we asked BLM to prepare MLPs for the Bighorn Basin and the Lander Field Office as part of the RMP revisions that are taking place in those areas. In that letter we explained why certain places in those Field Offices met the requirements for an MLP. The areas we felt needed the direction provided by an MLP were the Absoraka-Beartooth Front, Fifteen Mile Area, and Bighorn Front in the Bighorn Basin. In the Lander Field Office we asked that an MLP be developed that addressed the Dubois, Sweetwater/South Pass, and Beaver Rim areas. We reiterate those requests here and have enclosed the previously submitted letter and ask that it be considered as a component of this letter. As we explained in the prior letter, we think it is clear MLPs are required for these areas whether the BLM chooses to develop them as part of the RMP revisions or outside of the RMP revisions processes, although we believe that making the MLPs part of the RMP revisions makes practical sense. The implementation plan the BLM Wyoming State Office is preparing for the national office should make provision for developing MLPs for these Field Offices that focus on the areas we have identified.

Rawlins Field Office

Shirley Basin

In the Rawlins Field Office the BLM should develop an MLP for the Shirley Basin, the large area of BLM lands that lies to the north of the town of Medicine Bow, some of it in the checkerboard, but much of it in a large contiguous expanse of public land. We believe this area meets the requirements for development of an MLP. It is a vast expanse of sagebrush habitat that is virtually undeveloped and is therefore very valuable for that reason. It is one of the most “wide open” places in the State of Wyoming.

The BLM’s GeoCommunicator tool shows that this area is virtually unleased. As shown on Map 1-3 in the ROD and Approved Rawlins RMP, this area has essentially all Federally owned minerals. The resource values of this area, and thus the potential for conflicts and the need for additional analysis and information, is also undeniable. This area is home to a black-footed ferret recovery area and oil and gas leasing in this area could be a threat to this highly

endangered and emblematic species. Much of this area is crucial winter or yearlong range for pronghorn, contains crucial winter range and parturition areas for elk, and contains a number of sage-grouse leks. See Maps 2-53, 2-56, and 3-13 in the ROD and Approved Rawlins RMP. This area is currently one of the most oil and gas development-free areas in the State of Wyoming. Thus, special planning to preserve the “wide open” character of these important undeveloped public lands is warranted.

At a minimum, in the December, 2008 lease sale the BLM offered at least 12 lease parcels for sale that were located in the southern part of the Shirley Basin in the vicinity of the town of Medicine Bow. Thus, there is at least some industry expression of interest in this general area. And Map 3-5 in the Proposed RMP and FEIS for the Rawlins Field Office shows that there are three oil and gas fields in the southern part of this area. Map 4-7 in the same document shows that a number of oil and gas wells have been drilled in this area between 1986 and 2008, and that there is an area of high to moderate oil and gas potential just to the west of the Shirley Basin in the Hanna area. According to Map 12 in the Rawlins Oil and Gas Reasonable Foreseeable Development (RFD) Scenario, much of the Shirley Basin has a high potential for oil and gas occurrence. See http://www.blm.gov/wy/st/en/programs/Planning/rmps/rawlins/og_rfd.html. See also <http://www.blm.gov/wy/st/en/programs/Planning/rmps/rawlins/minerals.html> (Rawlins Mineral Occurrence and Development Potential Report). Consequently, it seems apparent that there is at least moderate potential for oil and gas development in this area.

When the four criteria are considered, it is apparent that an MLP is “required” for the Shirley Basin area and provision for this should be incorporated into the leasing reform implementation plan that the BLM Wyoming State Office is preparing for the BLM’s national office.

In addition to the Shirley Basin, we feel called to direct BLM’s attention to the lands that extend from about 20 miles north of Interstate 80 south along the east side of Wyoming Route 789 to the Colorado Border. Under the Rawlins RMP the BLM makes a number of special management area designations in this area, including: Chain Lakes Wildlife Habitat Management Area (WHMA), Red Rim-Daley WHMA, Jep Canyon WHMA, Upper Muddy Creek/Grizzly WHMA, Cow Butte/Wild Cow WHMA, Stratton Sagebrush Steppe Research Area, and the Sand Hills/JO Ranch ACEC. There is at least one citizen proposed wilderness in this area—the Wild Cow Creek Citizens’ Proposed Wilderness. While the extensive level of current leasing in this area may preclude it from qualifying for an MLP, it is nevertheless clear this area deserves special management focus. At a minimum much of it is threatened and/or impacted by the large Atlantic Rim coalbed methane project that is occurring in this area. So while the BLM may not be “required” to develop an MLP for this area, the *general* leasing provisions that are established by IM 2010-117 and which apply to *all* leasing decisions certainly apply, and the BLM should ensure that they are carefully applied to this area of considerable biological value.

In addition, we also ask the BLM to consider whether an MLP should be developed for the Green Mountain/Ferris Mountains/Shirley Mountains/Seminole Mountains area in the northern part of the Field Office. This is a vast and wild area and much of it is undeveloped. Consequently development of an MLP could be appropriate. As BLM’s Geocommunicator

website shows, much of this area is only lightly leased. There is a majority Federal interest in the minerals in this area. The resource values, and thus potential for conflict, are also undeniable—at a minimum the Ferris Mountains WSA, Blowout Penstemon ACEC, Cave Creek ACEC, and Shirley Mountain Special Recreation Management Area occur in this area and there is considerable big game crucial range in this area, including for bighorn sheep. And there is at least some oil and gas development in this area in the vicinity of Bairoil and to the east of U.S. Highway 287 at the base of the Ferris Mountains. Consequently it appears this area may qualify for development of an MLP.

Casper Field Office

Bates Hole

In the Casper Field Office the Bates Hole Management Area should be managed pursuant to an MLP. This area is recognized for its great values, particularly for sage-grouse.

According to data available on BLM's GeoCommunicator website this area appears to be only lightly leased, certainly a substantial portion of it is unleased. According to Map 3 in the ROD and Approved Casper RMP, virtually all minerals in this area are Federally owned. And again, there would seem to be no doubt this area has resource issues and potential conflicts that require additional analysis or attention. This is especially true relative to sage-grouse; this area is recognized as very important sage-grouse habitat. Potential extensive new oil and gas development in important sage-grouse habitat is exactly the kind of situation that demands preparation of an MLP. We note that BLM is engaging in multiple RMP revisions in Wyoming to update the sage-grouse protections in these plans, including for the Casper RMP, which emphasizes the need for further analysis of the impacts of oil and gas leasing and development in this area. According to Map 6 in the ROD and Approved Casper RMP much of this area is crucial big game habitat and there are numerous raptor nests in the area. There is a significant amount of habitat for the threatened Ute Ladies'-tresses in this area (Map 7) and there are many sage-grouse leks as well as bald eagle roosting habitat in the area (Map 8). A considerable portion of this area is managed as VRM Class II (Map 10). The North Platte River Special Recreation Management Area occurs here and the National Historic Trails traverse at least some of this area (Maps 14 and 17). Clearly there are resources or cumulative impacts that require additional analysis or information due to the occurrence of multiple use or natural/cultural resource conflicts.

Reviewing BLM lease sales from just 2007 and 2008 indicates that in six of the lease sales approximately 13 parcels were offered for sale in the Bates Hole area (parcels WY-0702-130, WY-0704-060, WY-0804-215, WY-0806-040, -042, -043, -044, -045, WY-0808-081, -082, WY-0812-124, -130, -131). So industry has apparently nominated lease parcels in this area. And according to the Wyoming Oil and Gas Conservation Commission website there are eight oil and gas fields in the Bates Hole area (Bolton Creek, Canal, Government Bridge, Poison Spring Creek, Ritter, River Bend, Schrader Flats, and Spindletop North) and a number of other fields are in the vicinity. And according to Map 12 in the Casper Reasonable Foreseeable Development Scenario, essentially the whole Field Office, including Bates Hole, has a high potential for oil

and gas occurrence. See <http://www.blm.gov/wy/st/en/programs/Planning/rmps/casper.html>. See also *id.* (presenting the Casper Mineral Occurrence & Development Potential Report). Thus, the Bates Hole area is one where industry has expressed interest in leasing and there is at least a moderate to high potential for oil and gas occurrence “confirmed by the discovery of oil and gas in the general area.”

Given these lines of evidence it seems the Bates Hole area meets the four criteria specified in the IM, and accordingly an MLP is “required” for this important natural area and provision for such should be included in the leasing reform implementation plan that is being prepared.

Buffalo Field Office

Fortification Creek

The entire Fortification Creek Area, which is to say the *entire* elk yearlong range (See Map 1-2 in the Fortification Creek Area Draft RMP Amendment/EA), is of great importance to many Wyoming citizens, and there have been a number of controversies surrounding oil and gas development in this area recently. Consequently, it would be prudent to develop an MLP for this area.

Given the rather intensive level of existing natural gas development proposals in this area, it is clear that much of this area has been leased. BLM’s GeoCommunicator tool also shows this area is rather heavily leased. Nevertheless, as with the Adobe Town area we believe the BLM should not be extremely technical or strict in evaluating this criterion. We would note that the term “substantial” is not defined in the IM, so BLM has discretion as to how to interpret this term. Given the intense controversy that has surrounded development of natural gas PODs in this area and BLM’s ongoing effort to develop an RMP Amendment that would provide special management direction for this area (even absent an MLP), development of an MLP would seem advised. An MLP could be a compliment to, or a component of, the RMP Amendment.

Assuming the first criterion is deemed to be met there would seem to be no doubt the remaining criteria are met. This area is primarily Federally owned minerals. The intense level of interest industry is showing in developing this area—including for example the Augusta Unit Zeta, Michelena, Carr Draw III West, Carr Draw V, and Carr Draw IV PODs—shows that there is a moderate to high potential for oil and gas to occur in this area, which has been confirmed by natural gas discoveries in this area—there are numerous producing wells in the area. There also can be no doubt this area requires additional analysis or information to address issues related to natural or cultural resource conflicts as well as impacts to specially designated areas.

The WSA in this area is well known, and certainly constitutes “other specially designated areas.” This WSA stands out as something of a beacon in northeast Wyoming because it is so rare in this part of the State. In addition the BLM has recognized that a large portion of this area meets the requirements for ACEC designation. Probably most importantly the unique elk herd

that occupies this area demands special management attention. The BLM has recognized the special or unique attributes of this Plains-dwelling herd of elk. The BLM has managed the Fortification Creek area as a special or unique area since at least the 1980s and it is currently developing an RMP Amendment that would provide special management direction for this area. Thus, it seems clear this criterion is also met.

As with the Lander and Bighorn Basin areas, development of this MLP could be incorporated into the ongoing revision of the Buffalo RMP. Or, development of the MLP could be made part and parcel of the RMP Amendment that is being developed for the Fortification Creek area. Combining MLP development with these RMP efforts would allow for greater efficiency of staff resource allocation. And again, development of an MLP would allow for addressing in a productive way the many controversies that have attended natural gas development in this unique and important area. It would seem highly advised to attempt to address and reduce these controversies through development of more detailed leasing guidance for the area. And finally, again, we want to emphasize that in our view an MLP must address the *entire* elk yearlong range in this area, not the more circumscribed management area identified in the Fortification Creek Area Draft RMP Amendment/EA. We feel it is clear the concerns and controversies that have attended development in this area have centered on concerns about the *entire* elk yearlong range, not just the more limited area identified in the Draft RMP Amendment. Consequently the MLP for this Field Office should address the entire elk yearlong range in the Fortification Creek area.

General Considerations

We recognize that preparing eight MLPs would be a big job and that it is unlikely they can be prepared simultaneously or in short order. For that reason we believe it would be appropriate for BLM to prioritize areas where MLPs will be developed more immediately and other areas where it may take longer before they can be developed. We believe certain iconic landscapes that have widespread public support and/or concern as well as existing conflicts or potential conflicts should be given priority treatment, including for example Little Mountain, Adobe Town, and Fortification Creek. But while we recognize that BLM may have to prioritize development of MLPs and that they probably cannot all be prepared immediately, we nevertheless believe the areas we have identified in this letter meet the four criteria specified in the IM, and when that is the case, under the terms of the IM development of an MLP is "required." Consequently we believe the implementation plan the BLM Wyoming State Office is developing for the BLM Washington Office should recognize all of these areas as being areas where an MLP should be developed, and make plans to do so.

One way that the workload associated with developing these MLPs might be reduced would be to combine MLPs for some areas. For example, the Shirley Basin and Bates Hole areas are nearly contiguous, and thus it might be possible to prepare a single MLP for the Casper and Rawlins Field Offices.⁴ And the Tunp, U.S Highway 189, and Miller Mountain areas are

⁴ If the Ferris Mountains/Shirley Mountains/Seminole Mountains areas were subject to an MLP, they too could potentially be included in this single MLP.

also contiguous or nearly so, and therefore it might be possible to prepare a single MLP for the Kemmerer and Pinedale Field Offices. The Jack Morrow Hills area is contiguous with the South Pass/Sweetwater area in the Lander Field Office. We also note that the Jack Morrow Hills area is contiguous with the Wind River Front Special Recreation Management Area in the Rock Springs Field Office, which is contiguous with the Wind River Front Management Area in the Pinedale Field Office, meaning a vast landscape scale area of unique and protected landscapes can be provided for, especially if this was also combined with the South Pass/Sweetwater area in the Lander Field Office. There could be other ways in which to combine or merge MLPs, which might reduce the number that need to be developed, and the associated workload.

Other ongoing efforts by the BLM might also present opportunities to manage the workload for these MLPs. First, the BLM is in the process of preparing RMP Amendments for five Field Offices to incorporate more up-to-date guidance regarding sage-grouse management. It might be worth considering incorporating development of the MLPs that are in relevant Field Offices (Kemmerer, Rock Springs, Pinedale, Rawlins, and Casper) into the sage-grouse RMP Amendments. This might allow meeting two needs with one process. In many cases sage-grouse management will be a key component of any MLP. Second, the BLM is planning reviews of the VRM system guidance in the Rawlins and Rock Springs Field Offices. VRM classifications could be a key component of MLP considerations, and consequently it might be efficient to combine the two processes, at least somewhat. **In any event, we ask that these comments as they apply to the Rock Springs and Rawlins Field Office also be considered as comments on the inventory of visual resources that is being conducted in these Field Offices. The Shirley Basin and other areas we mentioned in the Rawlins Field Office and the Jack Morrow Hills, Adobe Town, and Little Mountain areas in the Rock Springs Field Office are "especially sensitive" geographic areas which BLM has asked to be identified by the public. Moreover, these comments identify the sensitivities of outdoor recreation uses in these areas, baseline values of the landscapes and scenery, and the types of development that could negatively affect the visual quality of these landscapes, which again are issues that BLM has asked for comment on. Thus, again, we ask that these comments also be considered as comments regarding the VRM analysis being conducted in the Rock Springs and Rawlins Field Offices, which the BLM has invited from the public.**

Furthermore, with respect to the areas that are identified for MLP development we believe that it is important to carefully manage oil and gas development in these areas in the interim before the MLPs are developed. This is especially important if there will be a significant period of time before an MLP is developed. At a minimum the BLM should ensure careful adherence to the "general" lease parcel review and lease issuance guidance identified in the IM (See IM 2010-117 at 7-13) in all areas it identifies for MLP development in the time period before the MLPs are developed. Any leasing in these areas should be carefully analyzed and regulated in the period of time before an MLP is developed. We draw your attention to the "other considerations" identified in the IM relative to general leasing management, including particularly the need to consider whether non-mineral resource values are greater than potential mineral values. See IM at 9-10. We feel that if the areas discussed in this letter are identified for MLP development it would be appropriate and likely required that there be no leasing in these

areas before an MLP is developed when consideration of the mineral versus non-mineral values is made.

That said, we recognize that an MLP is not necessarily a “no leasing” decision-making document and that leasing and development could occur in the areas we have identified pursuant to any MLP that is developed. Some leasing and development already occurs in at least some of these areas. Accordingly, the MLPs should carefully consider not only areas that must be closed to future leasing, or subject to no surface occupancy, but also provide for careful guidance and regulation for any leasing and development that is allowed to occur. The IM clearly contemplates this. IM at 5-6. Protecting the unique values of MLP areas should be the overarching goal in the plans, whether that is accomplished through closing the area to leasing or surface occupancy, or through less strict measures such as ensuring optimal lease parcel configurations and application of needed best management practices and conditions of approval.

Conclusion

We appreciate BLM’s consideration of these comments as it moves forward with the compliance and implementation requirements of IM 2010-117. We believe the information we have presented shows that MLPs are required in the Field Offices we have identified, addressing the unique areas that have been described. Consequently we urge the BLM Wyoming State Office to commit to developing MLPs for these areas and to make such a determination apparent in the August 16, 2010 leasing reform implementation plan that it will submit to the BLM Washington, D.C. office. Thank you.

Sincerely,



Bruce Pendery
Wyoming Outdoor Council

And on Behalf of:

Dan Heilig
Western Resource Advocates

Lloyd Dorsey
Greater Yellowstone Coalition

Steve Thomas
Wyoming Chapter of the Sierra Club

Linda Baker
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Powder River Basin Resource Council

Enclosures

cc: Bob Abbey, BLM Director
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Governor Dave Freudenthal
John Ruhs, BLM High Desert District Manager
Stephanie Conolly, BLM High Plains District Manager
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