



January 26, 2016

Kimberlee Foster
Field Manager
Bureau of Land Management
Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901

RE: Proposal for Inclusion in BLM's Preferred Alternative in Rock Springs BLM Draft Resource Management Plan Revision

Dear Ms. Foster,

The Greater Little Mountain Coalition (Coalition) is pleased to submit the following proposal to be considered in the Bureau of Land Management's (BLM) development of alternatives in the Rock Springs BLM Draft Resource Management Plan Revision (DRMP). This proposal is specific to the Greater Little Mountain Area (GLMA).

The Coalition is proposing the following resource management prescriptions:

- Implementation of a Master Leasing Plan (MLP) for the GLMA;
- Creation of additional no surface occupancy (NSO)/right of way avoidance (ROW) areas in the specific management areas of Sugarloaf Basin, Sage Creek and Pine Mountain to protect fish and wildlife habitat and recreational opportunities;
- Maintain existing management in Currant Creek and Red Creek management areas;
- Controlled surface use stipulations (CSU); and
- Management for responsible energy development.

Background

The Coalition is an assembly of sportsmen and women organizations, union members and more than 2,500 concerned hunters, anglers, and recreationists who want to see the GLMA's valuable multiple-use landscape continue to support abundant fish and wildlife populations, protect federal and state recognized sensitive species and provide ample recreation opportunities. The Coalition partners include: Bowhunters of Wyoming, Muley Fanatic Foundation, Southwest Labor Council, Steelworkers Union 13214, Theodore Roosevelt Conservation Partnership, Trout Unlimited and Wyoming Wildlife Federation.

Proposal Discussion

Master Leasing Plan. As one of Sweetwater County's and Wyoming's most popular hunting, fishing, recreation and wildlife viewing areas, the GLMA is a perfect place to showcase the Master Leasing Plan (MLP) process and how it meets the MLP criteria set forth by Department of Interior's Instruction

Memorandum (IM) No. 2010-117.¹ IM 2010-117 and subsequent requirements in the BLM's Planning for Fluid Mineral Resources Handbook (H-1624-1, Chapter V) provide the BLM guidance for developing MLPs. In short, the concept is to take a proactive, focused look at oil and gas leasing decisions, displacing the traditional broad planning area-wide leasing decisions that accompany RMPs. In doing so, it effectively provides a specific fluid minerals leasing decision for a defined portion of the planning area that is tiered to the broader RMP.

To be successful, a MLP should include objectives, allowable uses and management actions for a defined portion of the planning area. The MLP components should be compatible with overall planning area goals for the Rock Springs resource area, but they must be distinct and applicable to a defined location, such as the GLMA.

The data provided by the BLM's Reservoir Management Group has identified the GLMA within the Rock Springs Planning Area as very low to low in terms of conventional oil and gas potential for the period 2012-2031² (see Map A). This creates a more favorable setting for establishing an MLP within the GLMA. Thus, the BLM should first catalogue and analyze resources and uses that may be impacted by oil and gas development in the Affected Environment Chapter of the DRMP in order to effectively avoid and mitigate impacts to resource values within an MLP area. Then, the BLM should establish resource condition objectives and develop resource protection measures as detailed in H-1624-1, Chapter V.

These elements are critical for a successful MLP for the GLMA. We hope that our suggestions assist the BLM to 1) ensure that an adequate level of analysis is undertaken to support MLP development, 2) help the public understand the MLP process, rationale and decision, and 3) provide certainty for both industry and conservation interests.

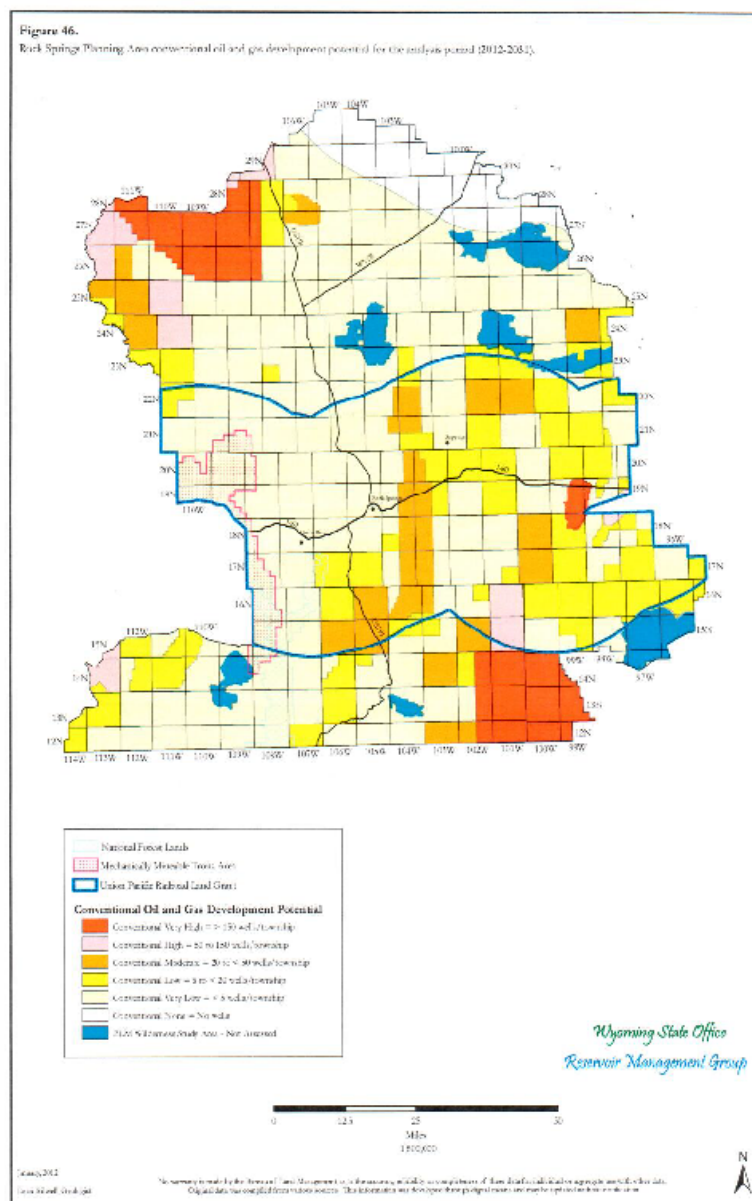
As noted in our 2010 and 2011 letters (attached) to the BLM,³ the Coalition believes the GLMA is the ideal place to showcase the MLP process. The MLP concept will serve as a proactive solution to create balanced multiple-use management, reduce stakeholder conflict over time and protect fish and wildlife species.

While the Coalition is concerned about potential direct and indirect long-term impacts from leasing proposals, simultaneously, we are proactive in advocating for responsible energy development in the GLMA. This approach ensures that critical habitat areas have limited surface use from energy development while other areas are open for development using specialized management prescriptions protecting high value ecological resources, recreational opportunities and quality fishing and hunting activities for future generations. We continue to encourage the BLM to consider retiring leases that are due to expire and are located within GLMA resource areas that contain crucial habitat for fish and wildlife. Such actions are supported in the IM 2010-117 and similar actions are recommended in the current GRRMP.

¹ BLM. 2010. Instruction Memorandum No. 2010-117. Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews. Section II: Master Leasing Plans.

² BLM. January 2012. Wyoming State Office Reservoir Management Group – Description of Oil and Gas Potential Analysis in the BLM Rock Springs Resource Planning Area's "Reasonable Foreseeable Development Report for the Rock Springs BLM Resource Management Plan. 2013". Figure 46.

³ Greater Little Mountain Coalition. 2010. Letter to Don Simpson, Wyoming State Director, BLM regarding *Master Leasing Plan Proposal for Greater Little Mountain Area in Southwest Wyoming*. Dated July 15, 2010. Copy to Lance Porter, Wyoming BLM Rock Springs Field Manager and John Ruhs, Wyoming BLM High Desert District Manager (among others).



Map A. BLM Reservoir Management Group's analysis of conventional oil and gas development for the Rock Springs resource planning area.

Proposed Resource Protection Areas. The GLMA contains a diverse and sensitive ecosystem. The current Green River Resource Management Plan (GRRMP) recognizes the unique qualities of the GLMA by providing specific management direction to protect this exceptional area. Over the years, Trout Unlimited, Muley Fanatic Foundation, Rocky Mountain Elk Foundation and the Wyoming Game and Fish Department have completed extensive habitat work within the GLMA that improves fish and wildlife habitat conditions. These partners and others have contributed more than \$3 million to the GLMA since 1990, working with BLM on habitat projects designed to conserve and enhance native cutthroat trout and big game habitat, improve grazing management and provide opportunities for hunting, angling and other outdoor recreation activities. These habitat improvements have increased angling and hunting activities translating to an impressive \$12.7 million in total hunter expenditures in the GLMA in the last

five years and \$48.4 million in angling activities expenditures over the last five years in the GLMA and surrounding Sweetwater County. The GLMA is not only valuable in terms of its habitat component but also in its outdoor recreational economic contributions.⁴

The Coalition appreciates the importance of energy development to the economies of Sweetwater County and the state. Our proposal recognizes current mineral leaseholders and does not affect their valid existing rights. Our proposed recommendations are for all new leasing activities.

Sugarloaf Basin Special Management Area—No Surface Occupancy

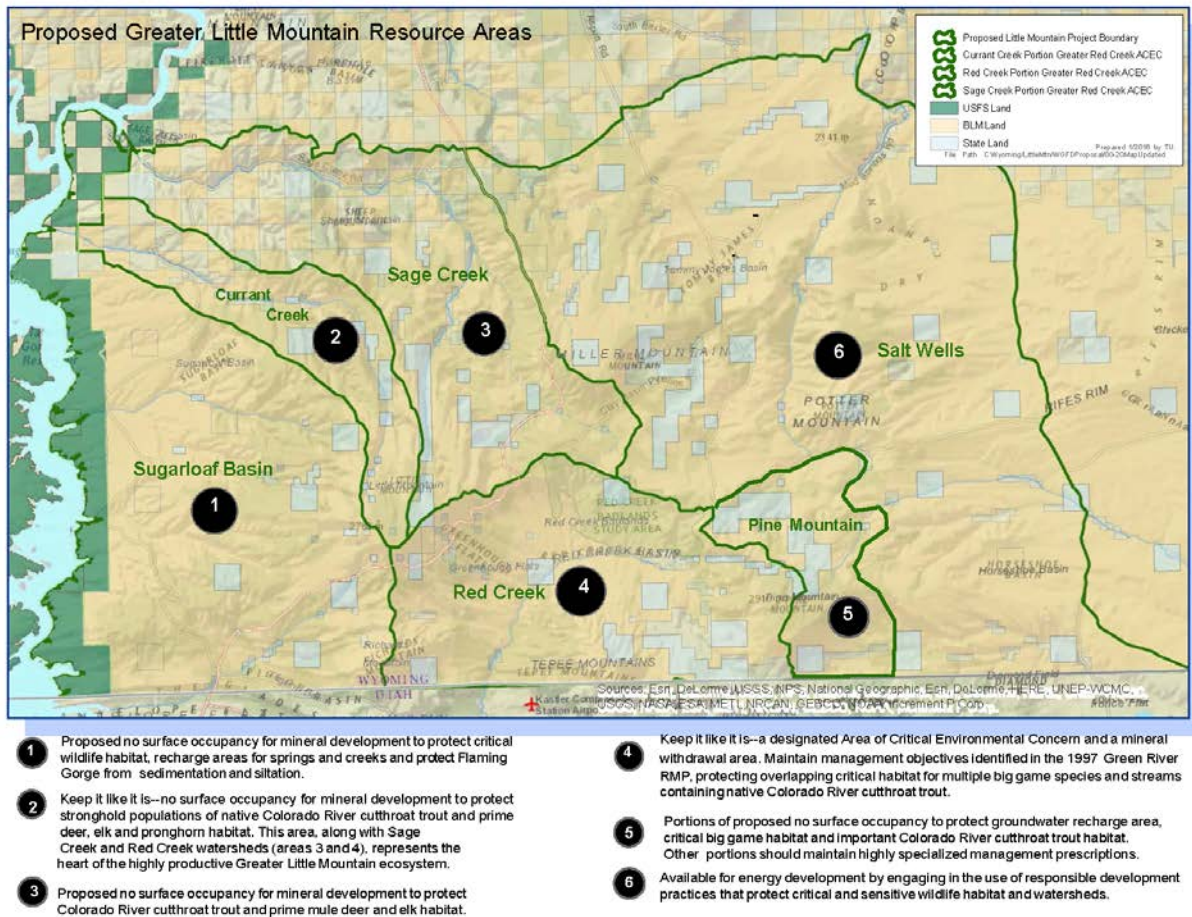
The importance of the Sugarloaf Basin Special Management Area (SMA) to trout and other fish has increased over the years due to sensitivity of the Marsh Creeks watershed to soil erosion. The Marsh Creeks flow directly to Flaming Gorge Reservoir, and could be a significant contributor to the increasing levels of siltation and sedimentation to the reservoir if surface impacts are not avoided. In addition, the SMA is a known groundwater recharge area, providing local aquifers important water supplies for plants, springs and streams in the area. The addition of roads (from energy development activities) can create hard surfaces that prevent rain and snow from soaking back into the ground and replenishing these valuable groundwater recharge zones.

The Marsh Creeks complex is a series of short, first order perennial streams that flow directly into Flaming Gorge Reservoir. We recommend NSO in the area to prevent surface disturbance (through roads, well pads, heavy vehicle use, etc.) that creates and thus conveys large amounts of sediment into Flaming Gorge. Incorporating more restrictive management options will minimize the amount of cumulative phosphorus loading and eutrophic conditions in the reservoir and help to protect the important and popular recreational fishery. In addition, the short distance each of the Marsh Creeks travel before entering the Gorge heightens the vulnerability of these watersheds, not just to sediment loading, but real significant threats of a petroleum spill escaping and reaching the reservoir before being noticed or contained. These potential issues could have direct impacts on the Gorge's salmonids and other sport fish populations.

The Sugarloaf Basin SMA also provides crucial winter-yearlong habitat for mule deer, elk and pronghorn antelope. In addition, a portion of the SMA is designated Greater sage-grouse core habitat while other portions contain habitat for midget-faded rattlesnakes, a sensitive species in Wyoming. Finally, the SMA provides a significant Utah juniper habitat complex, supporting an assemblage of juniper-obligate mammal and bird species.

Because of the important reasons described above, the Coalition is proposing NSO for mineral development in the SMA to protect critical wildlife habitat, groundwater recharge areas for springs and creeks and the Flaming Gorge Reservoir from sedimentation and siltation.

⁴ Economics and harvest data for the GLMA and Sweetwater County compiled by Trout Unlimited using BLM, Wyoming Game and Fish Department and Sweetwater County data.



Map B. Greater Little Mountain resource areas depicting proposed alternative for consideration in the Rock Springs BLM Draft Resource Management Plan.

Currant Creek Portion of the Red Creek ACEC – Maintain Existing Management

The Currant Creek watershed is currently managed as NSO under the current GRRMP and is part of the Greater Red Creek ACEC (Area of Critical Environmental Concern). The Coalition recommends this management objective (for mineral development) be maintained. Currant Creek is one of the numerous streams in the GLMA that provides an important stronghold for conservation populations of native Colorado River cutthroat trout (CRCT) as these populations are located in one of the driest regions of CRCT's historic range and are the only remaining population that still occupies this semi-arid zone⁵. Considerable habitat work has occurred in this watershed to improve and stabilize this sensitive stream. In addition, the area contains critical big game habitat for elk, mule deer and pronghorn antelope. Maintaining current management will result in the continued improvement of healthy fish and wildlife habitat.

Sage Creek Portion of the Red Creek ACEC – No Surface Occupancy

The Sage Creek portion of the Greater Red Creek ACEC should be managed as NSO for mineral development in order to protect sensitive CRCT habitat and elk and mule deer crucial winter and parturition areas. Due to the highly erodible nature of the soils in this area, surface disturbing activities

⁵ Trout Unlimited. 2009. Internal white paper titled "Analysis of the Potential Impacts of BLM Proposed Oil and Gas Development Leases on Colorado River cutthroat trout in the Little Mountain Area of Wyoming." Amy L. Haak. January 2009.

will increase the sedimentation problem the drainage is currently experiencing. Under the Coalition's proposal, the Sage Creek management area would be strengthened from the current level of management objectives identified in the GRRMP by increasing protective measures for critical habitat for CRCT and big game species.

Red Creek ACEC—Maintain Existing Management

The Red Creek watershed and entire landscape is a designated ACEC and a mineral withdrawal area. The Coalition supports maintaining the continued management objectives for this unique place due to its importance of overlapping crucial habitat for multiple big game species and streams containing conservation populations of CRCT.

Pine Mountain Management Area—Part NSO-Part Special Management Guidelines

The Pine Mountain Management Area is a designated management area in the GRRMP because of its significant fish and wildlife habitat. The Coalition recommends that a portion of the Pine Mountain MA be designated NSO in order to protect groundwater recharge areas, crucial big game habitat and important CRCT habitat. Outside of the proposed NSO, the Coalition supports mineral leasing with specialized management prescriptions such as CSU stipulations, utilization of mandatory best management practices, potential implementation of a phased development scenario and mandatory reclamation standards prior to more development. Additional recommendations for mineral management include directional drilling from a minimal number of well pads and implementing the Wyoming Game and Fish Department's "Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat."⁶

Salt Wells Resource Area—Responsible Energy Development Practices

Engaging in the use of responsible development practices that protect crucial and sensitive wildlife habitat and watersheds should remain at the forefront of any current or proposed management actions and objectives. The Salt Wells Resource Area contains crucial wildlife ranges, steep erodible slopes and high recreational value for elk and mule deer hunting. The area is also important to existing and future oil and gas production in Sweetwater County. Based on a specific scientific review of the GLMA, the Coalition supports removing big game timing stipulations on development in the Salt Wells Resource Area so long as NSO management is implemented in Sage Creek, Sugarloaf Basin Special Management Area, and a portion of Pine Mountain, and the management prescriptions for Sage Creek and Red Creek remain the same.

Development proposals should be vetted through the Wyoming Game and Fish Department to determine best placement for well pads and associated structures. The BLM should highlight the need for industry to use gold book standards for reclamation and maintenance of native vegetation.

Summary

The GLMA continues to provide some of the best hunting and angling for residents and non-residents alike, offer abundant opportunities for outdoor recreation, is an important contributor for livestock operations, a significant economic engine for outdoor recreation in the County and provides energy development opportunities for a variety of energy resources. Like many landscapes in the West, research is proving that increased development of our valuable natural resources impacts fish and wildlife habitats. Much of the GLMA is leased and the Coalition believes development can be completed responsibly in identified areas using a Master Leasing Plan component. With the application of new technologies, impacts to our waters and landscapes can be minimized. However, there are places that should be

⁶ Wyoming Game and Fish Department. 2010. *Recommendations for Development of Oil and Gas Resources within Crucial and Important Wildlife Habitat*. Cheyenne, Wyoming.

conserved and protected that provide the life support essential for fish and wildlife. For these reasons, we ask that the BLM apply NSO stipulations to Sugarloaf Basin, Sage Creek and portions of Pine Mountain and maintain existing management in Red Creek and Currant Creek. To help strike a balance, we would then support relaxation of timing stipulations in the Salt Wells area.

The Coalition requests that our proposed recommendations be included in the proposed action and preferred alternative currently being formulated for the Draft RMP. We look forward to working with the BLM on this important resource document.

Sincerely,

Tasha Sorensen
Wyoming Field Representative
Trout Unlimited
409 Lincoln Street
Lander, WY 82520
307-256-3446
TSorensen@tu.org

Joy Bannon
Field Director
Wyoming Wildlife Federation
P.O. Box 1312
Lander, WY 82520
307-335-8633
joybannon@wyomingwildlife.org

Monte Morlock
United Steelworkers and Southwest Labor Council

Josh Coursey
Muley Fanatic Foundation

Steve Martin
Bowhunters of Wyoming

Nick Dobric
Theodore Roosevelt Conservation Partnership

Attached in pdf: GLM Coalition 2010 Letter to the BLM on MLPs in the Greater Little Mountain Area



June 10, 2011

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

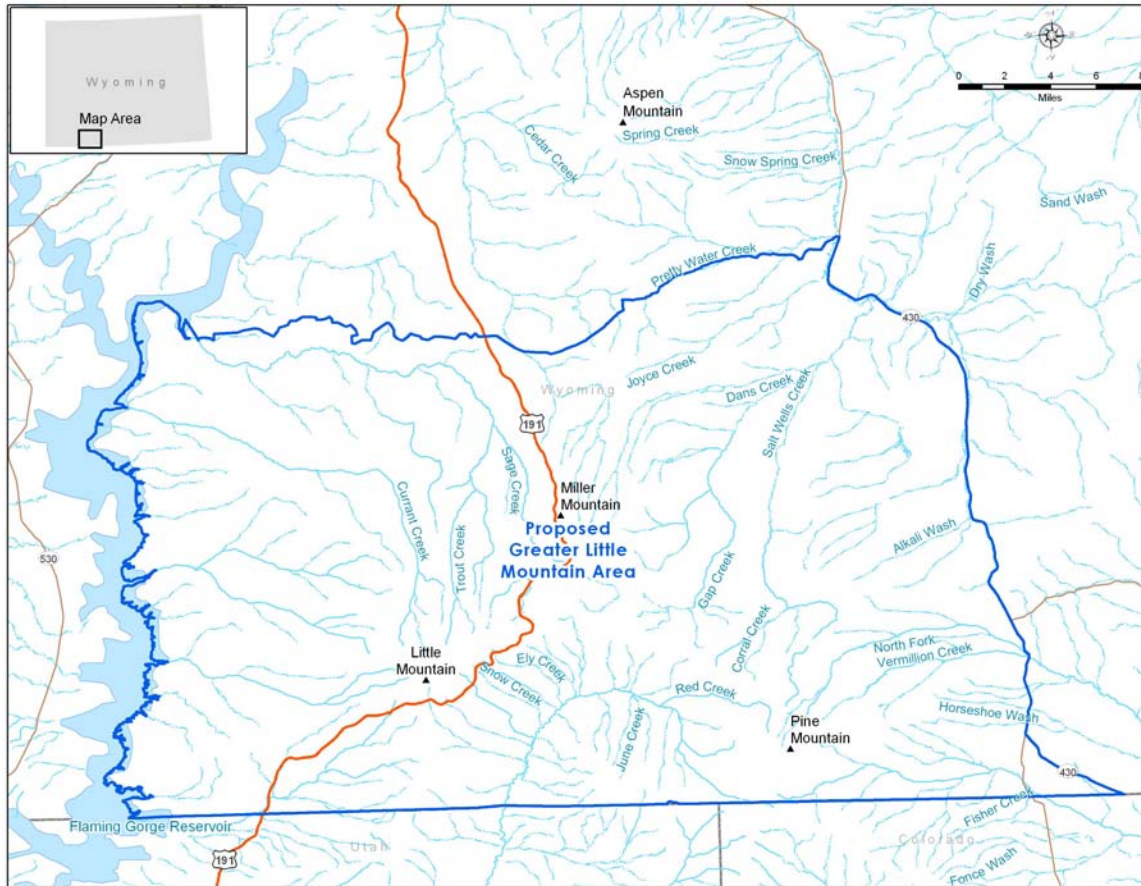
RE: April 1, 2011 response letter to MLP recommendations

Dear Mr. Simpson,

On behalf of the Greater Little Mountain Coalition we thank you and your staff for responding to our Master Leasing Plan Proposal for the Greater Little Mountain Area (GLMA). We appreciate the time and energy that was spent analyzing our proposal as well as others throughout the state. Based on your response letter and reading the Wyoming Oil and Gas Leasing Reform Implementation Plan we understand that you “expect” to incorporate MLP analysis of the Greater Little Mountain Area into the RMP revision process.

We understand that this is a new process for all of us and wanted to take this opportunity to express our willingness to work collaboratively with the BLM, and other stakeholders, to ensure that this becomes a useful part of the land use planning process. Since the BLM first created the MLP concept we felt it could be an effective way to reduce stakeholder conflict and to manage the GLMA on a landscape scale for the benefit of all.

Since we are identified as the MLP proponents for the GLMA in the Leasing Reform Implementation Plan we wanted to make a couple of clarifications regarding our proposal and the implementation plan. Of greatest significance the implementation plan uses two different maps for the Greater Little Mountain boundary. The first map is contained in the executive summary under “Wyoming Category 2 Nominations” and this boundary is consistent with the boundary map submitted in our MLP proposal (Map A). The second map is figure 15 on page 42 of the implementation plan and is not the same map we submitted with our proposal. The difference in these two maps has the following ramifications.



A. MLP boundary proposed by Greater Little Mountain Coalition

The map on page 42 contains all of the checkerboard land south of I-80, to the border and between Flaming Gorge and Highway 430. The map submitted by the Greater Little Mountain Coalition uses the same West, East and Southern boundaries but uses the bottom of the checkerboard for the Northern boundary. The checkerboard area in question falls outside the area of focus for the Coalition. For this reason we would like to clarify that we are not proposing an MLP analysis for the portions of checkerboard contained within the map on page 42 of the Leasing Reform Implementation Plan.

Additionally, the map on page 42 was used in the Leasing Reform Plan for all of the analysis of the Greater Little Mountain MLP. This resulted in data that is drastically different than what was presented in our proposal and potentially how it has been considered. For example, when using the map on page 42, that includes the checkerboard, to determine if the GLMA meets the MLP criteria in IM 2010-117, you are correct in saying that only 24 percent of the acreage is unleased (Leasing Implementation Plan p.41). However, when you use the map we submitted and that you use in your executive summary, 47 percent of the area is unleased. These percentages paint a different picture of how the area fits within the criteria. While determining if the area meets the MLP criteria may be a mute point at this time we feel it is important to note that there are distinct differences in how each map relates to the criteria. It was our belief that when using the map on page 42 the area was not well suited to a MLP analysis, but that when the checkerboard is removed the area is well suited to a MLP analysis. As you move forward implementing MLP analysis for the GLMA we recommend that you clarify which boundary will be used.

We would also like to offer our support in developing a plan for implementing the MLP analysis for the GLMA and would appreciate if you would inform us of any plans for how this process might occur. For instance, timelines, communication strategies, how the MLP will be wrapped into the RMP process and how the public will be involved are examples of information that interest the Coalition. Through continued collaboration we hope to be a positive partner in implementing a MLP for the GLMA that will result in greater certainty for stakeholders and ensuring that the areas multiple resources are managed in a balanced manner.

Thank you for your time and consideration.

Respectfully representing the Greater Little Mountain Coalition,

Steven Brutger
Trout Unlimited
250 N 1st St
Lander, WY 82520
307-332-6700 Office
307-438-2596 Cell

Joy Bannon
Wyoming Wildlife Federation
P.O. Box 1312
Lander, WY 82520
307-335-8633 Office
307-287-0129Cell

Monte Morlock
United Steelworkers of America 13214
2904 Westridge Drive
Rock Springs, WY 82901
307-872-2136 Office
307-382-3815 Home

Josh Coursey
Mule Deer Foundation – Muley Fanatic
2695 Alamosa Circle
Green River, WY 82935
307-389-7495 Cell

Neil Thagard
Theodore Roosevelt Conservation Partnership
2401 Heights Avenue
Cody, WY 82414
208-861-8634 Cell

Steve Martin
Bowhunters of Wyoming
483 Quadrant Drive
Rock Springs, WY 82901
307-350-0486 Home

cc: Bob Abbey, BLM Director
Larry Claypool, Deputy State Director, Minerals and Lands
John Ruhs, Wyoming BLM High Desert District Manager
Lance Porter, Wyoming BLM Rock Springs Field Office Manager
Trisha Cartmell, Petroleum Engineer, Rock Springs BLM
Vera-Lynn Harrison, Project Manager, Rock Springs RMP



July 15, 2010

Mr. Don Simpson, Wyoming State Director
Bureau of Land Management
5353 Yellowstone Road
P.O. Box 1828
Cheyenne, Wyoming 82003

Re: Master Leasing Plan Proposal for Greater Little Mountain Area in southwest Wyoming

Dear Mr. Simpson:

The Greater Little Mountain Coalition applauds the recent energy policy revisions pertaining to the Onshore Oil and Gas Leasing Reforms (Instruction Memorandum No. 2010-117). These reforms bring some much needed balance back to our oil and gas leasing and development programs. As these reforms are implemented within each state office, it is imperative to ensure that these concepts are put into action.

With this in mind, the Greater Little Mountain Coalition (referred to as Coalition) would like to be an active participant in developing ideas to aid in the implementation of these leasing reforms. We are particularly interested in the Master Leasing Plan (MLP) concept as it is a strong mechanism that incorporates the needed balance by identifying areas that would benefit from further evaluation, scientific analysis, and updated management actions. Our letter to you today offers a proposal for consideration of a pilot project using the MLP concept.

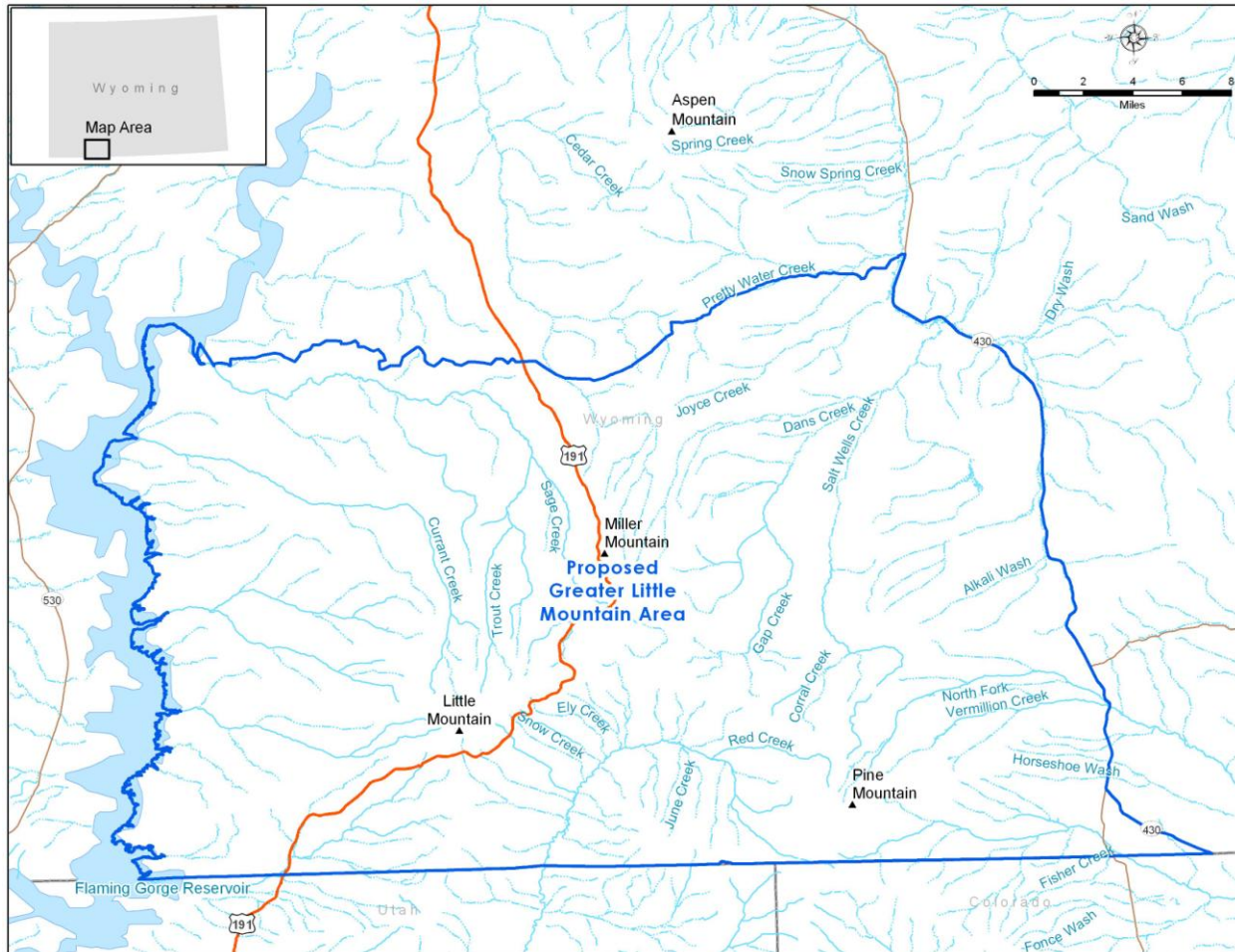
Our Coalition believes the Greater Little Mountain Area (GLMA) is a perfect place to showcase the MLP process. The GLMA is a unique landscape of BLM lands in southwest Wyoming that not only meets the criteria for an MLP, as described in the IM, it also has a number of other unique circumstances that make it a prime candidate for a MLP designation. This concept will serve as a proactive solution to create balanced multiple use management, reducing stakeholder conflict over time.

For the last three years, our Coalition of sportsmen groups, labor union members, local anglers and hunters, citizens and businesses have been working to advocate for responsible energy development in the GLMA. Additionally, the Governor of Wyoming, local, county and city government, industry and more traditional interests like livestock operators have all voiced a desire for a balanced multiple use solution in the GLMA. This combination of interests are coming together in a way which presents an opportunity for delineating areas where energy development is not appropriate, areas where specified stipulations dictate how development will occur, and areas that use responsible energy development practices.

It is clear that the existing Green River Resource Management Plan (GRRMP) for the Rock Springs BLM office is outdated, having been completed in 1997. However, the field office just received funding to revise the plan. A public notice is said to be released in November of 2010. If an MLP is initiated for the GLMA, it could be combined with the GRRMP revision rather than as an RMP amendment. Without comprehensive analysis that incorporates current resource science and management scenarios, along with a landscape scale look at this special area, we feel that the GLMA will be placed in jeopardy. It is our recommendation that the GLMA be considered for a Master Leasing Plan.

PURPOSE: The MLP concept represents a great opportunity to take a landscape scale approach to leasing and development of oil and gas resources in important natural resource areas prior to an area being leased. It is our belief that the GLMA in southwest Wyoming (Map A) meets the MLP criteria set forth by IM No. 2010-117 and would be a great place to showcase this concept.

The Coalition believes this mechanism could resolve or greatly reduce future public land management conflicts among the numerous stakeholders. A landscape scale review that accounts for cumulative impacts followed by a balanced multiple use strategy for the region will consider the multitude of energy activities that have the potential to impact this area. With natural gas drilling activities up by more than 900 rigs, compared to this time last year, it seems obvious that there is increased interest in developing natural gas. In addition, with increased interest in developing wind energy and other resources in the GLMA, a more proactive management scenario suggests that the MLP would be a prudent course of action. Increases in energy development in this area could potentially mimic the conflict among various stakeholders (i.e., ranchers, hunters, anglers, community, wildlife advocates, and businesses) within the Pinedale, Wyoming resource area, such as loss of wildlife habitat, loss of animal unit months (AUM) for ranchers, big game population declines, sage grouse impacts, and water and air quality concerns. By implementing a MLP in the GLMA prior to further development, stakeholders will have increased buy-in in the long-term management of the area, and hopefully avoid many of the conflicts we have seen in other areas of Wyoming.



Map A. Greater Little Mountain Area Boundary Map

CRITERIA: Below are the BLM’s four criteria for the preparation of a MLP and our supportive rationale for a MLP in the GLMA. In addition, the following information can aid the Wyoming BLM office in writing their Implementation Plan and timeline for accomplishing those tasks outlined in the IM and due August 16, 2010 to the Washington office.

Criteria 1: *A substantial portion of the area to be analyzed in the MLP is not currently leased.*

The GLMA includes lands north of the Colorado and Utah border, east of the Flaming Gorge Reservoir, west of highway 430 and south of the checkerboard (Map A). To be more specific, the GLMA encompasses 522,236 acres of federal and state lands of which 278,311 acres (53%) are leased and of that 74,585 acres (14%) are held in production. The IM does not define “substantial” and the Coalition would like to suggest that this first criterion be given some broad leeway. This terminology becomes more unclear when, under Criteria 2, the word "majority" is used to describe how much federal mineral interest is held in an area. Using the word “substantial” in Criteria 1 shows a clear intent to set a lower threshold for the standard used

when applied to the area leased. When compared to “majority” this means that a “substantial” threshold could be met with less than 50% of the area being un-leased.

As Director of this state’s BLM agency, you are very aware that a majority of BLM lands in Wyoming and most of the West have been leased during the last ten-year period. However, not all have been developed. In addition, a significant portion of the leased parcels within the GLMA have expired this spring or are due to expire over the next few years. These expiring leases will increase the percentage of un-leased lands over time. We understand that not all of these leases will necessarily expire. However, given that many leases in the area have expired in the past couple of years we feel it is an important statistic that adds to our case that a “substantial” portion of the area is un-leased. We are not advocating a particular outcome for these leased areas but simply providing reasoning for why the GLMA meets the MLP criteria. For clarification, a BLM primary lease term is 10 years and will continue beyond that primary term if oil and gas is produced in paying quantities. The following data in Table 1 represent leases projected to expire in the coming years within the GLMA. Note that many of these leased acreages lie within sensitive and critical fish and wildlife habitat, highlighting our interest in these particular leases.

Year	Projected Acres Expiring	Percent of Projected Acres Expiring based on GLMA total acreage	Percent of Projected Acres Leased within GLMA
2010	49,191 acres	9%	Leaving 44% of the GLMA leased
2011	40,387 acres	7%	Leaving 37% of the GLMA leased
2012	1,989 acres	0.3%	Leaving 37% of the GLMA leased
2013	46,204 acres	8.8%	Leaving 28.2% of the GLMA leased

Table 1. Oil and Gas Lease Parcels Projected to Expire

While there has been significant leasing in this area, there has been relatively little development. Since 2008, just one well has been drilled within the boundaries of the GLMA, creating a further need for a comprehensive leasing and development plan that the MLP concept would provide.

The following table (Table 2) illustrates the amount of acreage under lease within several of the highly sensitive fish and wildlife areas in the GLMA. These areas have been identified as special designated areas in the GRRMP of 1997. Our interest includes those acreages in the Sage Creek ACEC, the Currant Creek ACEC, the Red Creek ACEC, Pine Mountain SMA, and the Sugarloaf Basin SMA, which totals 275,820 of Federal GIS acres. Many lease parcels within the identified areas are currently under review by the BLM and according to the IM it is entirely appropriate to apply this new policy to such parcels.

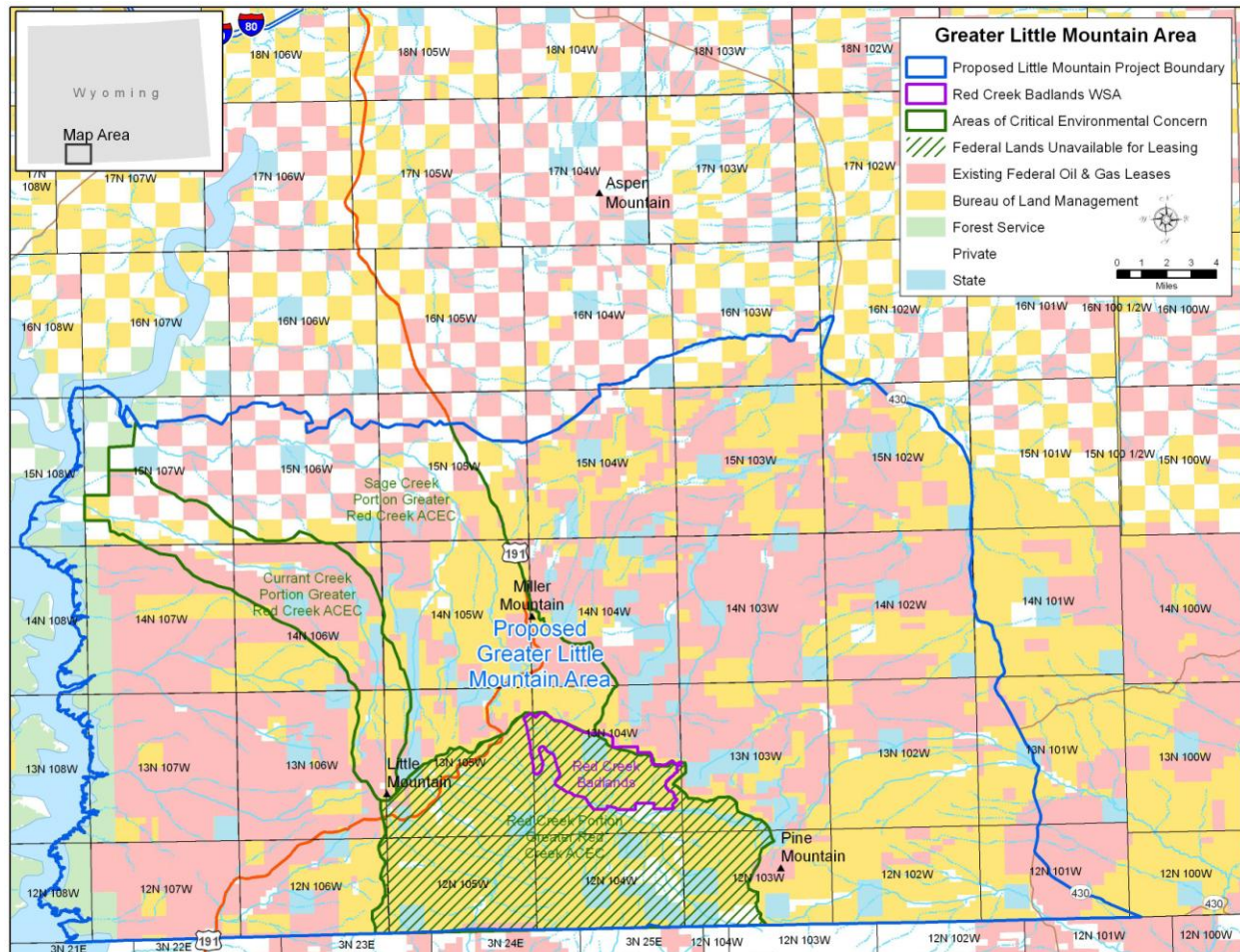
	Federal Acres (GIS)	GR RMP Acres (plats)	No O&G Leasing Areas	NSO Acres	CSU Acres	Acres Leased to Oil and Gas	% Acres Leased	Comments
Red Creek Wilderness Study Area	8,051	8,020	8,051	-	-	-	0	
Sage Creek Portion of the Greater Red Creek ACEC	52,199	52,270	-	-	52,199	31,698	61%	Northern Portion is within checkerboard
Current Creek Portion of the Greater Red Creek ACEC	25,924	23,740	-	25,924	-	17,171	66%	Northern Portion is within checkerboard
Red Creek Portion of the Greater Red Creek ACEC	47,696	55,880	46,226	-	-	1,470	3.10%	Leases pre-date WSA
Pine Mountain Special Management Area	62,758	64,200	-	-	62,758	56,007	89%	-
Sugarloaf Special Management Area	87,243	85,880	-	1,600	85,643	74,896	86%	-
Remaining BLM Lands within GLMA	150,601	144,482	-	-	-	97,069		
State and Private Lands within GLMA	87,764	87,764	-	-	-	-		
Total	522,236	522,236	54,277	27,524	200,600	278,311		

Table 2. Greater Little Mountain Area Acreage

**The acreages presented above are subject to slight variations due to differences in GIS layers.*

Criteria 2: *There is a majority Federal mineral interest.*

The BLM manages a majority of the GLMA (83%) and nearly all of the mineral interests in this area are federally owned. The GRRMP FEIS, Map B, shows this ownership. Our Coalition has also created a map (Map B) to view mineral interest designation.



Map B. GLMA Mineral Interest Designation

Criteria 3: *The oil and gas industry has expressed a specific interest in leasing, and there is a moderate or high potential for oil and gas confirmed by the discovery of oil and gas in the area.*

The GLMA encompasses 522,236 acres of federal and state lands of which 278,311 acres (53%) are leased by oil and gas companies and of that 74,585 acres (14%) are held in production. From January 2008 through January 2010, five BLM WY Oil and Gas Competitive Lease Sales have included parcels within the sensitive areas of the GLMA. Due to protests from sporting groups, conservation organizations, citizens and the Governor, parcels within the GLMA were deferred from issuance in three of those five sales until further environmental analysis could be completed. In addition, the upcoming lease sale on August 3, 2010 is offering four leases totaling

6,361 acres (of which 6,161 acres are within the GLMA boundary) near the Potter Mountain Elk Butte region of the GLMA. We request that the BLM reevaluate the adequacy and environmental analysis, including the new lease parcel review process and issuance of leases for this August 2010 lease sale. This would provide a case example for which you could include in your Implementation Plan to the Washington office.

Also since 2008, the BLM has approved Devon Energy's Baxter Natural Gas Drilling proposal (EA FONSI), the Rubicon 3D Seismic Survey proposal (also Devon's) (EA FONSI), the Horseshoe Basin 3D Seismic Survey proposal (EA FONSI), and is in the process of writing the final environmental assessment for the North Dutch John 2D Seismic Survey proposal (Azalea Oil Co.). All of these projects are located within the GLMA. Finally, Devon Energy had approval to drill two exploratory wells in their Baxter Natural Gas southern platform in late 2008. Devon drilled one well in 2008 with a result of both oil and gas deposits in significant quantities. Devon Energy has yet to drill the second well that was approved within the Trout Creek drainage.

Criteria 4: *Additional analysis or information is needed to address likely resource or cumulative impacts if oil and gas development were to occur where there are the following:*

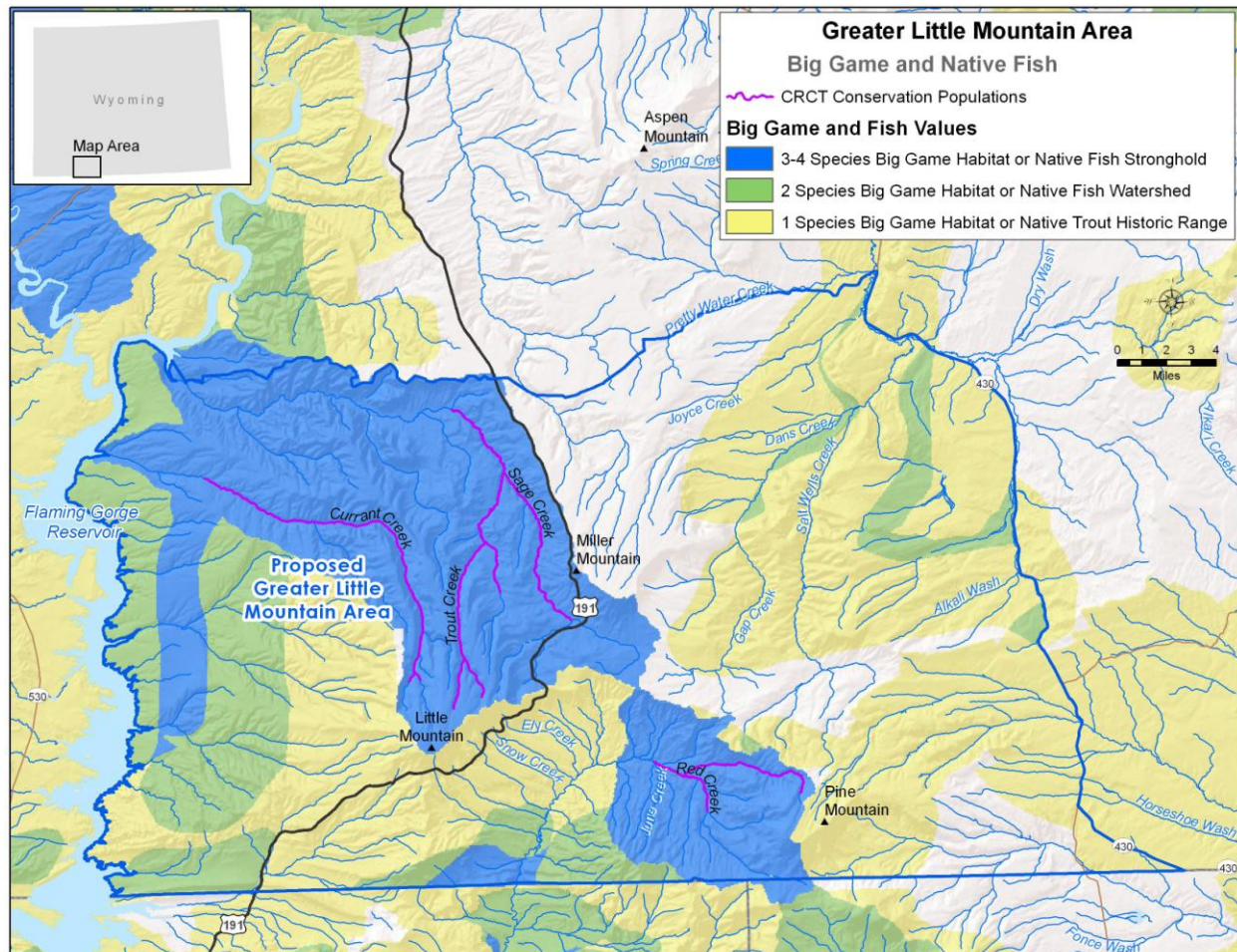
- ***Multiple-use or natural/cultural resource conflicts***

Both the Wyoming Game and Fish Department and the Governor of Wyoming have been very vocal in their opposition to further lease sales and oil and gas projects in sensitive fish and wildlife habitats within the GLMA. Indeed, the BLM has long recognized the outstanding fish and wildlife resource values of this area as described in the GRRMP and evidenced by the over \$2 million worth of habitat improvement projects that have been initiated here since 1990. The BLM contributed the largest amount at \$1,652,814 and the Wyoming Game and Fish Department spent the second largest amount at \$341,174, while other contributors interested in protecting and improving this area included Trout Unlimited, Rocky Mountain Elk Foundation, National Fish and Wildlife Foundation, Bowhunters of Wyoming, local donors, and others.

The GRRMP of 1997 recognized the significance of the valuable resources in this area. Establishments of No Surface Occupancy (NSO) stipulations, Controlled Surface Use (CSU) areas, no lease areas, and rights-of-way exclusion and avoidance areas exist in the GRRMP for large portions of this landscape. As earlier described, the BLM designated several Areas of Critical Environmental Concern (ACEC) containing important watersheds and wildlife habitat (Currant Creek, Sage Creek and Red Creek ACEC's). Additionally, the Red Creek Badlands Wilderness Study Area (WSA), the Pine Mountain Special Management Area (SMA), and the Sugarloaf Basin Special Management Area also exist within the GLMA.

The GLMA is a biologically rich landscape with abundant and diverse terrestrial and aquatic species. Some of the species include: elk, mule deer, antelope, sage grouse, mountain lion, black bear, numerous raptors (such as the Bald Eagle and the Ferruginous Hawk), and waterfowl. Overlapping critical winter habitat for elk, mule deer, pronghorn, along with yearlong big game habitat, exist in significant quantities (Map C). Migration routes for big game crisscross the GLMA and important breeding and rearing habitat for sage grouse exist. Portions of the

landscape are within Wyoming's Sage Grouse Core Area designated by Governor Freudenthal's Sage Grouse Implementation Team. And the entire area is within the Rock Springs BLM Field Office that is involved in the National Environmental Policy Act (NEPA) process for Instruction Memorandum (IM) 2010-012 and 2010-013 to revise sage grouse and sagebrush management direction in their resource management plans.



Map C. GLMA Big Game and Native Fish Strongholds

Colorado River cutthroat trout (identified as a Sensitive Species and a Species of Greatest Concern by the State of Wyoming and the BLM) are located within Upper Sage Creek, Curren Creek, Trout Creek, Red Creek, Gooseberry Creek, and Little Red Creek within the GLMA. Map C illustrates the significance of the specific high value fish and wildlife areas in the GLMA. Highly fragile and sensitive soils, subject to erosion, sedimentation, and washouts from sudden event storms, natural or manmade fires, or from heavy road traffic occur in this area. Current and past sedimentation and erosion events have impacted both the streams and riparian areas in addition to Flaming Gorge itself. This directly impacts future population survival of Colorado River cutthroat trout. The hydrology in this area represents an important groundwater recharge

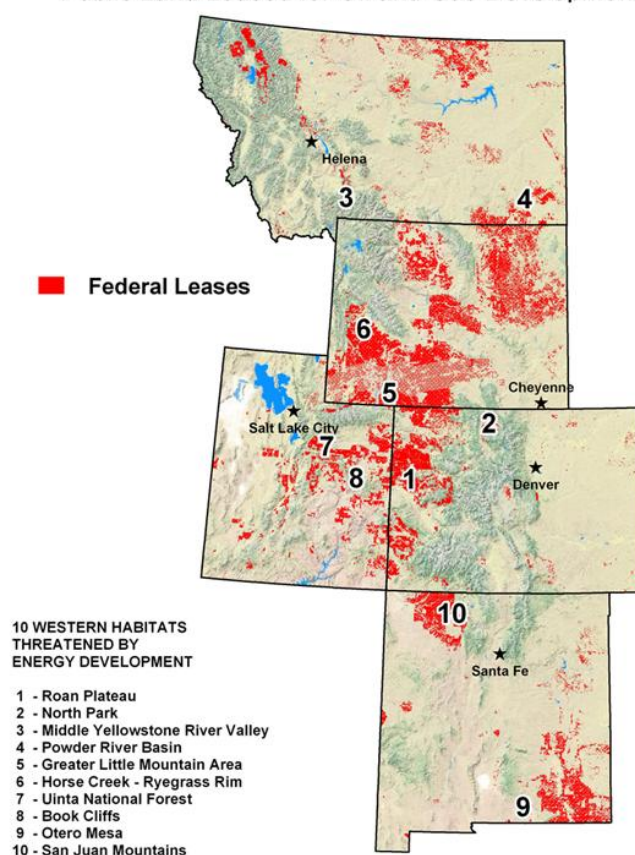
area for the numerous springs and coldwater streams in addition to providing the much needed water for wildlife in this high desert environment.

The GLMA also includes unique habitat for other state and federally recognized sensitive and threatened or endangered wildlife species such as the Pygmy Rabbit and the Midget-faded rattlesnake. Because of the contrasting aspen mountain community, juniper woodland and high desert sagebrush steppes, several raptor species occupy the GLMA that are considered as special status species, which include the Ferruginous Hawk, Golden Eagle, and the Bald Eagle.

The GLMA is a significant source for hunting and fishing opportunities for the public and simultaneously provides a vital role in contributing to the economic diversity for communities within this region. Flaming Gorge borders the western portion of the GLMA and is one of the largest reservoirs in the state. Obtaining the highly prized limited quota big game licenses in this area is often a life-long pursuit by the residents of Sweetwater County and the state. In fact, the GLMA is one of three most popular elk hunting spots in the state, the most popular deer area for both non-resident and resident hunters, and is an outstanding outdoor and backcountry recreation area.

In 2009, Sportsmen for Responsible Energy Development (SFRED) designated the GLMA as one of their top 10 western habitats threatened by energy development (Map D). It was chosen because of the area's ecologically balanced components, world class wildlife (both aquatic and terrestrial) that inhabit the GLMA. Conversely, this area is also valuable from a minerals perspective and as earlier discussed, more than 50% of the area is leased to oil and gas companies that have the right to develop those parcels. This combination leads to a natural/cultural resource conflict and calls for a plan that will mitigate this conflict. To date, leasing and development in this area have taken a case-by-case approach and a large landscape scale analysis has not been performed to address the likely cumulative impacts.

Public Land Leased for Oil and Gas Development



Map D. Top 10 Western habitats on public lands threatened by oil and gas development (SFRED map 2009).

- ***Impacts to air quality.***

The GLMA is composed of Class II, III, and IV visual airsheds. None of the recently approved projects within the GLMA were thoroughly evaluated for future air or greenhouse gas emissions or climate change impacts. New NEPA guidance will require this evaluation and the establishment of environmental mitigation commitments will need to be implemented. For this region of Wyoming, significant air quality issues exist with airsheds being compromised. Quantification of cumulative emissions over the life of the projects proposed for this area need to be considered and completed.

- ***Impacts on the resources or values of any unit of the National Park System, national wildlife refuge, or National Forest wilderness area, as determined after consultation or coordination with the NPS, the FWS, or the FS; or Impacts another specially designated areas.***

As mentioned earlier, the GLMA contains three ACEC's, two SMA's and one WSA. Impacts to these special areas from oil and gas development and other cumulative impacts could be significant and would include air quality, water quality, and surface impacts.

OTHER CIRCUMSTANCES:

A. Identifying and Evaluating Potential Resource Conflicts in a MLP

The following provides a non-exhaustive list of potential resource conflicts that should be considered when developing an MLP. All of the items listed under Section A, page 2 of IM 2010-117 are of concern for the GLMA. We have attempted to illustrate many of those in the previous discussion above. Potential resource conflicts that are not mentioned, but should be, include alternate and renewable energy development within the area.

This section of Wyoming has been identified as a significant area for oil shale development. It is also being considered for carbon sequestration projects, a water pipeline project from the Green River to the Colorado's front range, and has significant wind development opportunities. These potentially conflicting resource development issues need to be addressed. The impacts from numerous energy development projects on the surface and subsurface areas significantly increase the potential impacts to fish and wildlife.

B. Potential MLP Decisions.

The following examples identified in Section B on page 2 of IM 2010-117 include other planning decisions that may be made through the MLP process with supporting NEPA analysis. The approach and outcomes described in the IM mirror the type of analysis and approach we have been advocating for in the GLMA. The IM calls for resource protections identified through the MLP to be addressed as new or modified plan decisions that may include lease stipulations for new leases and/or closing certain areas to leasing. The GLMA recognizes that the 1997 GRRMP has designated specific stipulations for much of the GLMA that include NSO, Timing Limitations, Controlled Surface Use, planned unitization, and the implementation of best management practices in certain cases. Despite these fairly restrictive stipulations in recognition of the high value of this area, leasing of the lands occurred in these sensitive areas anyway.

However, the GRRMP is outdated in its energy resource information, lacks detailed discussion for phased leasing and development, as well as any requirements for the capture or reduction of air emissions, liquid gathering systems, multiple well installation, or caps on new surface disturbances. These items all represent recent management efforts at mitigation on federal lands in the West. The Coalition feels that by implementing the MLP in the GLMA, these planning decisions can be incorporated.

SUMMARY: The GLMA is uniquely positioned to utilize the Master Leasing Plan concept. An MLP in this area will serve as a positive solution which can guide energy development in a balanced manner for years to come. By strengthening guidelines for development of areas where no leasing and/or surface occupancy is appropriate, areas where stipulations and best management practices are appropriate, and areas where responsible energy development practices are acceptable, we can cooperatively create a strategy that will manage the numerous valuable resources of the GLMA while allowing for responsible energy development.

We thank you for this opportunity to present our reasoning for implementing a Master Leasing Plan in the Greater Little Mountain Area. We are available for any further assistance or involvement.

Respectfully representing the Greater Little Mountain Coalition,

Joy Bannon
Wyoming Wildlife Federation
P.O. Box 1312
Lander, WY 82520
307-335-8633 Office
307-287-0129 Cell

Steven Brutger
Trout Unlimited
250 N 1st St
Lander, WY 82520
307-332-6700 Office
307-438-2596 Cell

Monte Morlock
United Steelworkers of America 13214
2904 Westridge Drive
Rock Springs, WY 82901
307-872-2136 Office
307-382-3815 Home

Josh Coursey
Mule Deer Foundation – Muley Fanatic
2695 Alamosa Circle
Green River, WY 82935
307-389-7495 Cell

Steve Belinda
Theodore Roosevelt Conservation Partnership
PO Box 295
Boulder, WY 82923
307-537-3135 Office
307-231-3128 Cell

Steve Martin
Bowhunters of Wyoming
483 Quadrant Drive
Rock Springs, WY 82901
307-350-0486 Home

Tony Herrera
Southwest Wyoming Labor Council
1005 Oak Way
Rock Springs, WY 82901
307-362-7592 Home

cc: Bob Abbey, BLM Director
Ned Farquhar, BLM Deputy Assistant Secretary for Land and Minerals Management
Mike Pool, BLM Deputy Director (Operations)
Marcilynn Burke, BLM Deputy Director (Programs and Policy)
John Ruhs, Wyoming BLM High Desert District Manager
Lance Porter, Wyoming BLM Rock Springs Field Office Manager
Wyoming Governor Dave Freudenthal
US Senator John Barrasso
US Senator Mike Enzi
US Representative Cynthia Lummis