



State of Utah

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Office of the Governor
PUBLIC LANDS POLICY COORDINATING OFFICE

KATHLEEN CLARKE
Director

December 13, 2018

Submitted via electronic mail: blm_ut_lease_sales@blm.gov

Kent Hoffman
Deputy State Director, Lands and Minerals
Attn: Sheri Wysong
Fluid Mineral Leasing Coordinator
Utah State Office
Bureau of Land Management
440 West 200 South, Ste. 500
Salt Lake City, UT 84101

Subject: March 2019 Competitive Oil and Gas Lease Sales

Dear Mr. Hoffman:

The State of Utah has reviewed the 156 parcels proposed for oil and gas leasing in the BLM's March 2019 Utah Oil and Gas Lease Sale, including parcels in the Vernal, Price, Monticello, and Salt Lake BLM Field Offices. The State appreciates the opportunity to provide comments and requests that these comments be incorporated into the BLM's final decision making for the March 2019 lease sale. Responsible oil and gas development in rural Utah is critically important to the state's economy and could bring greatly needed jobs to struggling rural communities. The successful lease sale of all 156 parcels included on these proposed lists would have a positive impact on the State's economy and lower administrative obstacles to sustainable energy development.

The State fully supports the inclusion of all 156 parcels proposed for the March 2018 lease sale, totaling nearly 217,519 acres. The lease sale of these parcels is consistent with the 2008 Resource Management Plans (RMPs) for the Vernal, Price, and Monticello Field Offices. The 2008 RMPs, which the State supported at their adoption, strike the appropriate balance between responsible energy development and the preservation of Utah's scenic and natural resources. The "Proposed Actions" in each Environmental Assessments for the

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lease sales appropriately utilize lease notices and stipulations as provided for in the respective RMPs. The State therefore requests that none of the 156 parcels be deferred from the March 2019 lease sale. Inclusion of all 156 parcels in the March 2019 lease sale will further the goal of President Trump's Administration to promote "American Energy Independence."¹

The lease sale of all 156 parcels is also consistent with the State of Utah's 2018 Resource Management Plan,² as well of the County Resource Management Plans³ of the respective Utah counties impacted by the March 2019 lease sale. Under the Federal Land Management and Policy Act ("FLPMA"), BLM land use planning is required to be consistent with the resource management plans of state and local governments to the maximum extent, consistent with FLPMA and federal law.⁴

Helper City and Price City Drinking Water Source Protections Zones

The State supports the lease sale of all parcels within the Price Field Office, but requests that the BLM exercise caution for parcels located within the Fish Creek Spring Drinking Water Source Protection Zone for Helper City, Utah, and the Upper Colton Spring Drinking Water Source Protection Zone for Price Municipal Corporation (please see Map #1 included below, provided by the Utah Department of Environmental Quality). Proposed parcels where future oil and gas development could have some impact on drinking water sources with these two Drinking Water Source Protection Zones include UT1218-001, UT1218-002, UT1218-003, UT1218-004, and UT1218-005. Nonetheless, the State supports the lease sale of these parcels in conjunction with responsible protection of drinking water sources.

Conclusion

The State appreciates the frequency and efficiency with which the BLM is currently holding its quarterly oil and gas lease sales and hopes that these lease sales may continue. The State applauds the BLM's new policy of holding statewide lease sales as opposed to the

¹ See "Presidential Executive Order on Promoting Energy Independence and Economic Growth," President Donald J. Trump, March 28, 2017 available at: <https://www.whitehouse.gov/presidential-actions/presidential-executive-order-promoting-energy-independence-economic-growth/>.

² State of Utah Resource Management Plan, January 2, 2018, available at: <https://publiclands.utah.gov/current-projects/rmp/>.

³ See County Resource Management Plans for Utah Counties, 2018, available at: <https://publiclands.utah.gov/current-projects/rmp/>.

⁴ 43 U.S.C. 1712(c)(9), available at: <https://www.blm.gov/or/regulations/files/FLPMA.pdf>.

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former policy of rotating lease sales between BLM districts. Utah residents will continue to benefit as the BLM fulfills its mission to promote the sustained yield and multiple use of Utah's public lands. Please direct any questions or comments to the number below.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Clarke', with a long horizontal flourish extending to the right.

Kathleen Clarke
Director