



DUCHEсне COUNTY COMMISSION

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December 3, 2018

Mr. Kent Hoffman
Deputy State Director, Lands & Minerals
Bureau of Land Management
440 West 200 South, Suite 500
Salt Lake City, UT 84101

RE: March 2019 Oil & Gas Lease Sale

Dear Mr. Hoffman:

We are pleased to hear that, pursuant to the Trump Administration's goal of strengthening America's energy independence, the BLM is evaluating whether to offer 4,240 acres of BLM land in Duchesne County for oil and gas leasing. Those lands are the subject of our comments below.

The BLM is bound by FLPMA to make decisions that are consistent, to the greatest degree possible, with state and county plans. The parcels being considered for leasing in Duchesne County are located within the Uintah Basin Energy Zone, which was designated under Section 63J-8-105.5 of the Utah Code and is recognized in both the Utah State Resource Management Plan and the Duchesne County Resource Management Plan (see Map #10 of the Duchesne County RMP enclosed).

The Duchesne County RMP states as follows:

"Uintah Basin Energy Zone

There is established, pursuant to Utah Code, the Uintah Basin Energy Zone in Duchesne County for the purpose of maximizing efficient and responsible development of energy and mineral resources. The land area and boundaries of the Uintah Basin Energy Zone in Duchesne County consist of federal lands within the Townships and Ranges described below and as depicted on Map #10.

Uintah Special Base and Meridian: Township 3N, Range 1W; Township 3N, Range 2W; Township 3N, Range 3W; Township 3N, Range 4W; Township 2N, Range 1W; Township 2N, Range 2W; Township 2N, Range 3W; Township 2N, Range 4W; Township 2N, Range 5W; Township 2N, Range 6W; Township 1N, Range 6W; Township 1N, Range 7W; Township 1N, Range 8W; Township 1N, Range 9W, Township 5S, Range 8W, Township 5S, Range 9W; Township 6S, Range 3W; Township 6S, Range 4W; Township 6S, Range 5W; Township 6S, Range 6W; Township 6S, Range 7W; Township 6S, Range 8W; Township 6S, Range 9W; Township 7S, Range 4W; Township 7S, Range 5W; Township 7S, Range 6W; Township 7S, Range 7W; Township 7S, Range 8W; Township 7S, Range 9W.

Salt Lake Meridian: Township 8S, Range 15E; Township 8S Range 16E; Township 8S, Range

17E; Township 9S, Range 15E; Township 9S, Range 16E; Township 9S, Range 17E; Township 10S, Range 14E, Township 10S, Range 15E; Township 10S, Range 16E; Township 10S, Range 17E; Township 11S, Range 10E; Township 11S, Range 11E; Township 11S, Range 12E; Township 11S, Range 13E; Township 11S, Range 14E; Township 11S, Range 15E; Township 11S, Range 16E; and Township 11S, Range 17E.

The county finds, based on the 2002 Mineral Potential Report for the BLM Vernal Planning Area, that the lands comprising the Uintah Basin Energy Zone contain abundant, world-class deposits of energy and mineral resources, including oil, natural gas, oil shale, oil sands, gilsonite, coal, phosphate, gold, uranium, copper, sand/gravel, dimension/building stone, as well as areas with high wind and solar energy potential.

The highest management priority for all lands within the Uintah Basin Energy Zone is responsible management and development of existing energy and mineral resources in order to provide long-term domestic energy and supplies for Utah and the United States.

Policies: Duchesne County supports:

- 1. Efficient and responsible full development of all existing energy and mineral resources located within the Uintah Basin Energy Zone, including oil, oil shale, natural gas, oil sands, gilsonite, phosphate, gold, uranium, copper, solar, and wind resources; and*
- 2. A cooperative management approach among federal agencies, state, and local governments to achieve broadly supported management plans for the full development of all energy and mineral resources within the Uintah Basin Energy Zone.*

The county calls upon the federal agencies who administer lands within the Uintah Basin Energy Zone to:

- 1. Fully cooperate and coordinate with the county to develop, amend, and implement land and resource management plans and to implement management decisions that are consistent with the purposes, goals, and policies described in this section to the maximum extent allowed under federal law;*
- 2. Expedite the processing, granting, and streamlining of mineral and energy leases and applications to drill, extract, and otherwise develop all existing energy and mineral resources located within the Uintah Basin Energy Zone, including oil, natural gas, oil shale, oil sands, gilsonite, phosphate, gold, uranium, copper, solar, and wind resources;*
- 3. Allow continued maintenance and increased development of roads, power lines, pipeline infrastructure, and other utilities necessary to achieve the goals, purposes, and policies described in this section;*
- 4. Refrain from any planning decisions and management actions that will undermine,*

restrict, or diminish the goals, purposes, and policies for the Uintah Basin Energy Zone as stated in this Resolution; and

- 5. Refrain from implementing a policy that is contrary to the goals and purposes described within this Resolution.*

The county calls upon Congress to establish an intergovernmental standing commission among federal, state, and local governments to guide and control planning decisions and management actions in the Uintah Basin Energy Zone in order to achieve and maintain the goals, purposes, and policies described in this Resolution.”

Given the above county policies and the provisions in Utah Code associated with the Uintah Basin Energy Zone, there is no valid reason to withhold any of the parcels in Duchesne County from the lease sale. It appears that the stipulations and lease notices for these parcels will be more than adequate to mitigate potential impacts to the environment. Further, it appears that habitat for the Greater Sage-grouse is being avoided and that the BLM has done the proper analysis associated with special status plant species and wildlife.

We note that the parcels in Duchesne County were previously on the December 2018 lease sale list, but were deferred to the March 2019 list due to objections received from a number of non-governmental obstructionist groups. We urge the BLM to move forward with the leases in spite of the tactics of these groups.

Thank you for the opportunity to comment.

DUCHESNE COUNTY COMMISSIONERS

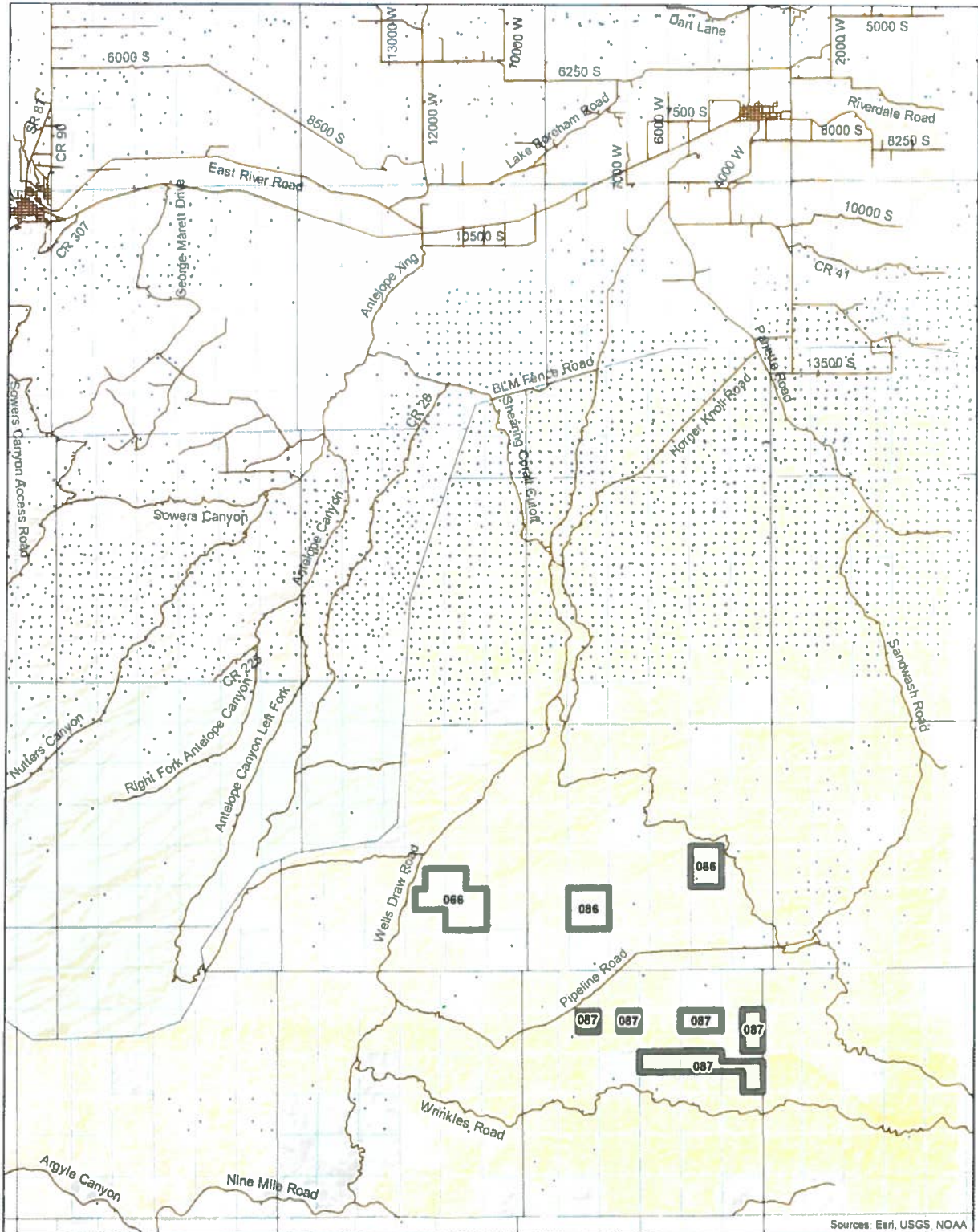
Ronald Whitton
Gregory Todd
Ken W. Brunel

Mike Hyde

Mike Hyde, AICP
Community Development Director

Enclosure

Utah March 2019 Duchesne County Oil and Gas Lease Sale Parcels



- Oil and Gas Wells
- B Roads
- ▭ March 2019 Oil and Gas Leases
- ▭ Sections
- ▭ Townships
- ▭ City Boundaries

- Bureau of Land Management
- Bureau of Reclamation
- National Forest
- State Trust Lands
- State Wildlife Reserve/Management Area
- Tribal Lands
- Utah Mitigation Commission

Duchesne County GIS
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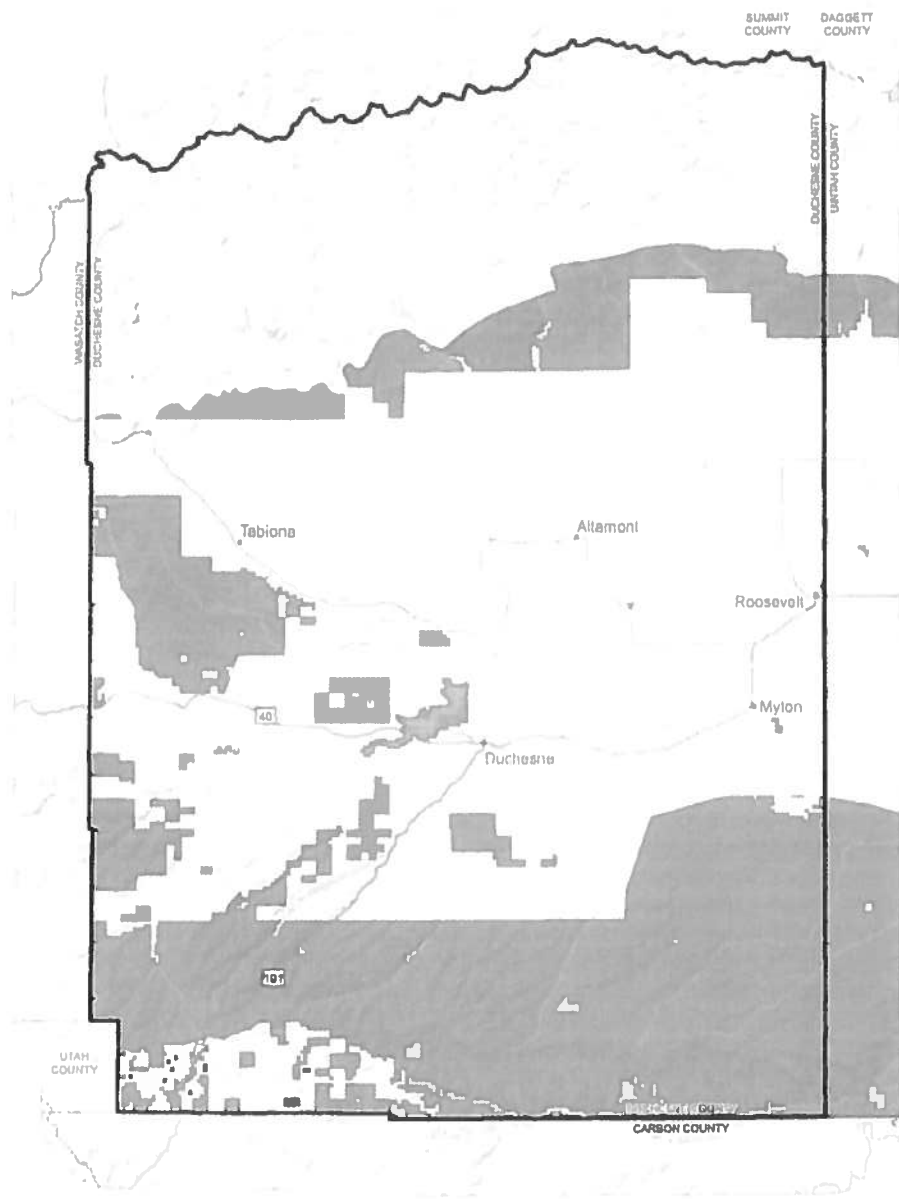
Map for reference purposes only



0 1 2 3 4
 Miles

Sources: Esri, USGS, NOAA

Map #10: Duchesne County portion of the Uintah Basin Energy Zone



-  Duchesne County Boundary
-  Uintah Basin Energy Zone
-  All Other Lands

Data Source: Duchesne County GIS 2013
 Download from ESRI ArcGIS Online
 World Terrain Base, accessed 11/16/2017
 Map Created: 11/16/2017

